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7<sup>th</sup> October 2026

Dear Executive Office

**Re: Northern Ireland's Draft Artificial Intelligence Strategy**

This response has been made by the Women's Regional Consortium (WRC). The WRC consists of seven established women's sector organisations<sup>1</sup> that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.

Due to pressure of time, workload and a lack of expertise in certain areas we are unable to complete a full response to The Executive Office consultation on Northern Ireland's Draft Artificial Intelligence (AI) Strategy.

While there is no doubt that Artificial Intelligence (AI) offers huge potential as a useful technology it also provides the potential for great harm. **We are very concerned about the overarching emphasis on AI developments in terms of economic growth and prosperity when it has the potential to adversely impact on equality, the environment, employment levels, quality of life, wellbeing and the potential to live life free from poverty and abuse. We believe it is critical that AI is effectively regulated to provide important protections for people, societies and the planet.** In particular, we believe that there is an urgent need to ensure that gendered harms are not perpetuated in the race to develop this technology.

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<sup>1</sup> The seven groups are Training for Women Network (TWN), Women's Resource and Development Agency (WRDA), Women's Support Network (WSN), Northern Ireland Rural Women's Network (NIRWN), Women's TEC, Women's Centre Derry and Foyle Women's Information Network (FWIN)

## **The need for regulation and governance of AI**

In recent weeks the media have widely reported comments by a senior employee at Anthropic who said that he believed there as a greater than 10% chance that Artificial Superintelligence (ASI) could “*kill all humans*” in the next decade. He also warned that his AI company did not have a plan to ensure that ASI did no harm.<sup>2</sup>

An AI breach in Australia highlights the potential for data breaches and serious harm without the necessary controls, governance and accountability mechanisms in place. In this case an OpenAI agent hacked into an Australian Government website (Australia’s Medicare Statistics reporting portal) and gained access to both public and non-public data.<sup>3</sup>

There are concerns about companies and countries being in a ‘race to get there first’ in relation to developments on AI which could result on less focus on the important areas of governance and regulation. As outlined by the Chief Scientist at Open AI “*International Coordination on future AI development needs to become a top priority for governments across the world.*”<sup>4</sup>

Labour MP Darren Jones has written a letter to the Prime Minister, the UN, OECD and G7/G20 calling for “*a new multinational treaty for the safe and regulated development of superintelligence*” and asking for a safety-first approach to the rapid development of this technology.<sup>5</sup>

There have been some positive moves by AI companies to address the safety concerns of the technology. OpenAI have recently announced scrapping the rollout of its latest AI model due to safety concerns. It said the model fell short in terms of “*staying within the scope and authorisation and how it communicates back to the user about the type of work it’s done.*”<sup>6</sup> While this is a positive example it is a rare instance of a major AI developer pulling a new release over safety concerns.

Professor Tony Cohn from the Alan Turing Institute said that “*safety should not be left purely in the hands of the developers; it should also be monitored and verified through independent government-approved regulators.*” It is clear that there is an urgent need for independent testing and monitoring of AI models as well as comprehensive laws in place to ensure that there are tighter controls and sufficient guardrails in place for the technology.

A UK Parliament Joint Committee report<sup>7</sup> has highlighted that “*there are many laws and regulations that may already apply to some AI systems, but overall the legal*

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<sup>2</sup> AI could kill all humans in next decade, warn experts: but how seriously should we take them? The Guardian, 9 September 2026

<https://www.theguardian.com/technology/2026/sep/09/ai-superintelligence-risks-warnings-scientists-politicians>

<sup>3</sup> <https://www.theguardian.com/technology/2026/sep/24/openai-agent-hacked-medicare-australia-what-we-know-so-far-ntwnfb>

<sup>4</sup> AI could kill all humans in next decade, warn experts: but how seriously should we take them? The Guardian, 9 September 2026

<https://www.theguardian.com/technology/2026/sep/09/ai-superintelligence-risks-warnings-scientists-politicians>

<sup>5</sup> <https://x.com/darrenpjones/status/2097605098411077991?s=20>

<sup>6</sup> <https://www.bbc.co.uk/news/articles/cm5y5nynl75ko>

<sup>7</sup> Human Rights and the Regulation of AI, Joint Committee on Human Rights, HC 160 / HL Paper 56, September 2026

*landscape is patchy and confused. There are many regulators who are charged with tackling some AI harms, but no single body co-ordinates regulation of AI. This leaves gaps which mean people will be affected by AI harms, but will not be able to get redress.”*

The report goes on to say that *“there is also far too much freedom for the large and powerful technology companies who develop AI systems to pass on liability to those who deploy them. These deployers are often less powerful, have less access to resources, and are not in the best position to identify risks or prevent harm occurring. The law does not target those who actually create and shape the systems. Responsibility to prevent harm should sit with those who are best able to do so.”*

This led the Joint Committee to call on the Government to take immediate action including bringing in a dedicated AI Bill and setting up a new Regulator to create tailored, effective protection for human rights in the UK. The Joint Committee called for the most dangerous uses of AI to be banned, and for others to *“be regulated in a principled and risk-based way, with strong sanctions for companies and organisations who damage human rights through their use of AI systems.”*

A Conference was held in September 2026 at Queen’s University, Belfast (QUB) with the theme of ‘Cyber Security in the AI Era.’ Professor Maire O’Neill from the Centre for Secure Information Technologies (CSIT) at QUB warned of the dangers of continuing to treat AI security as an *“afterthought”*. Professor O’Neill said that rather than continuing to reach to what AI can achieve with security measures, cyber-security needs to be embedded into the design and delivery of AI to protect society.<sup>8</sup>

There is important learning from these examples and research for Governments across the world including the NI Assembly. **Progress in terms of AI must not be at the detriment of people and their rights and this requires the timely development and implementation of the necessary safeguards and controls for AI technologies.**

### **The impact of AI on Gender Equality**

**We are concerned that the draft Strategy scarcely acknowledges the gendered impacts of AI and the potential for worsening gender inequality.** Gender inequality has been a longstanding problem across the world and as AI mirrors the gender bias that is present in society there are concerns about its impact on gender equality. UN Women have warned that the technology is reproducing old gender stereotypes, which amplify online abuse and leave women out of the decisions that will define the digital future.<sup>9</sup>

Due to the rapid advances in AI there is an urgent need to consider who is involved in creating AI and the biases which are or are not built into the AI data to understand how this can maintain, exacerbate or reduce gender equality gaps. Evidence suggests the problem is widespread. A study of 133 AI systems found that 44% demonstrated gender bias, while more than a quarter showed both gender and racial

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<https://publications.parliament.uk/pa/jt5902/jtselect/jtrights/160/report.html#heading-0>

<sup>8</sup> <https://www.belfasttelegraph.co.uk/news/we-live-in-profoundly-changing-times-ni-conference-examines-if-world-has-tools-to-prevent-ai-destroying-humanity/a/162356565.html>

<sup>9</sup> <https://news.un.org/en/story/2026/06/1167776>

bias.<sup>10</sup> Large language models have repeatedly associated women with the home, family and childcare, while linking men to business, leadership and career success. According to UN Women, when researchers asked large language models to simply complete a sentence that began with a person's gender, about one in five responses came back sexist or misogynistic.<sup>11</sup>

A study by the Harvard Business School shows *“that there is a large, persistent, and nearly universal gender gap in both the adoption and the intensity of generative AI use”*. The study found that women use generative AI less than men finding that men’s adoption is roughly 22% higher than women’s. The study concludes that *“without intervention, generative AI’s potential to drive economic growth and improve productivity will almost surely disproportionately benefit male users, with the potential to further entrench existing gender gaps.”*<sup>12</sup>

According to the latest Gender Snapshot 2026<sup>13</sup> women account for only around 22% of AI professionals globally and hold fewer than 14% of senior AI leadership positions. Women are also 20% less likely than men to use generative AI tools. Sarah Hendriks, Director of Policy, Programme and Intergovernmental Support at UN Women said:

*“The future of AI cannot be built by half the world’s talent. As artificial intelligence reshapes economies, societies and daily life, women’s equal participation is crucial to its design, governance and regulation. If women are excluded, the inequalities of today risk becoming embedded in the systems of tomorrow.”*<sup>14</sup>

UN Women is urging governments, companies and developers to ensure gender equality is built into the design, deployment and governance of AI systems.<sup>15</sup>

Of 138 countries assessed worldwide, only 24 referred to gender in their national AI strategies, and just 18 included substantive gender-responsive measures. **We note that the draft Strategy only mentions gender once and that is with reference to “gender-based gaps” in relation to educational provision.** We believe it is a serious omission not to consider AI and gender in the areas of equality, data, Violence Against Women and Girls, education, skills and employment.

### **AI and Violence Against Women and Girls (VAWG)**

**We are deeply disappointed that the draft Strategy does not sufficiently address the serious and growing impact of AI in relation to VAWG. This is despite the fact that The Executive Office is responsible for both the AI and the Ending Violence Against Women and Girls Strategies.**

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<sup>10</sup> Artificial Intelligence and gender equality, UN Women, June 2024

<https://www.unwomen.org/en/articles/explainer/artificial-intelligence-and-gender-equality>

<sup>11</sup> AI is getting women wrong as gender bias persists, data reveals, June 2026

<https://news.un.org/en/story/2026/06/1167776>

<sup>12</sup> Global Evidence on Gender Gaps and Generative AI Over Time, Harvard Business School, May 2026

[https://www.hbs.edu/ris/Publication%20Files/25-023\\_be8fb517-3dd5-40aa-97f9-4e42e1c8e6ff.pdf](https://www.hbs.edu/ris/Publication%20Files/25-023_be8fb517-3dd5-40aa-97f9-4e42e1c8e6ff.pdf)

<sup>13</sup> The Gender Snapshot 2026, UN Women

<https://www.unwomen.org/en/resources/gender-snapshot>

<sup>14</sup> AI is advancing fast. Women are being left behind in the workforce and leadership, UN Women, September 2026

<https://www.unwomen.org/en/news-stories/press-release/2026/09/ai-is-advancing-fast-women-are-being-left-behind-in-the-workforce-and-leadership>

<sup>15</sup> <https://news.un.org/en/story/2026/06/1167776>

AI is creating entirely new forms of abuse and dramatically amplifying existing ones. AI tools can drive and facilitate a range of harms affecting women and girls, including generating image-based sexual abuse material, initiating unwanted sexual communications, providing tailored advice on how to perpetrate gender-based violence and abuse, simulating abusive roleplays and scenarios, and normalising misogynistic attitudes through their immersive and human-like qualities.<sup>16</sup>

AI has made the tools that facilitate gendered violence and abuse user-friendly so that perpetrators do not need much technical expertise to create and publish deepfakes and once disseminated online these can be replicated multiple times, shared and stored on privately-owned devices making them difficult to find and remove.

A UN Report<sup>17</sup> has highlighted the concerns about AI and VAWG:

*“The recent growth in generative artificial intelligence (AI) is also having an impact on violence against women and girls by reinforcing and intensifying the misogynist norms that justify, excuse and normalize violence against women and girls and facilitating the proliferation of image-based abuse. There is evidence that such trends, in addition to having an impact on the perpetration of online violence, are linked to offline violence, including gender-related killings or femicides.”*

UN Women have highlighted how AI is increasing “the scale, speed, and severity” of technology-facilitated violence against women and girls.<sup>18</sup> Their research shows how AI-enabled violence—including deepfakes, manipulated sexual imagery/videos and other forms of image-based abuse—is intensifying existing patterns of harassment and constraining women’s participation in public life.<sup>19</sup>

Another UN Women study found that close to one in four surveyed women human rights defenders, activists and journalists have experienced AI-assisted online violence, such as deepfake imagery and manipulated content. Writers and public communicators, for example, social media content creators and influencers, who focus on human rights issues face the highest exposure, at 30%.<sup>20</sup>

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<sup>16</sup> Dangerous by Design Evidence for action on online violence against women and girls and the path to safer online spaces, Refuge and EVAW, September 2026  
<https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2026/09/Refuge-EVAW-Online-VAWG-Report-Sept-26.pdf>

<sup>17</sup> Intensification of efforts to eliminate all forms of violence against women and girls: technology-facilitated violence against women and girls, UN Report of the Secretary General A/79/500, October 2024

<https://www.unwomen.org/sites/default/files/2024-10/a-79-500-sg-report-ending-violence-against-women-and-girls-2024-en.pdf>

<sup>18</sup> <https://www.escudodigital.com/en/technology/artificial-intelligence/ai-workforce-still-overwhelmingly-male-women-hold-just-22-of-jobs.html>

<sup>19</sup> Tipping Point: Online Violence Impacts, Manifestations and Redress in the AI Age, UN Women, April 2026

<https://www.unwomen.org/sites/default/files/2026-04/tipping-point-online-violence-impacts-manifestations-and-redress-en.pdf>

<sup>20</sup> Tipping Point: The Chilling Escalation of Online Violence Against Women in the Public Sphere, UN Women, December 2025

<https://www.unwomen.org/sites/default/files/2025-12/tipping-point-the-chilling-escalation-of-violence-against-women-in-the-public-sphere-in-the-age-of-ai-en.pdf>

The research company Sensity AI has estimated that between 90% and 95% of all online deepfake videos are nonconsensual porn, and around 90% of those feature women.<sup>21</sup> A report into the state of deepfakes has found that the total number of deepfake videos online in 2023 was 550% higher than in 2019. Deepfake pornography makes up 98% of all deepfake videos online, and 99% of the individuals targeted are women.<sup>22</sup>

Research by Refuge and Ending Violence Against Women (EVAW)<sup>23</sup> found that two thirds (66%) of women reported being concerned about the role of AI technologies in enabling abuse and violence against women and girls with over 1 in 4 (28%) reporting that they are 'very concerned'. This research also showed that women have little confidence in the Government's existing approach to regulating AI technology. Two thirds (66%) of women reported that they are not confident that the Government is doing enough to regulate AI technology in the context of online VAWG and women and girls' online safety. In contrast, just 15% of women reported that they are confident the Government is currently doing enough and 19% didn't know. These findings point to a significant gap between the role of AI technology in women's everyday lives, and women's confidence that effective safeguards are in place to ensure they are protected from the potential harms driven or perpetuated by this technology.

Less than half of countries have laws that prosecute online abuse and where the laws do exist, enforcement is weak. Add to this the fact that the tech platforms lack accountability, there is limited reporting and access to justice. The transitional nature of AI-generated digital abuse further drives impunity.<sup>24</sup>

Despite the fact that laws are beginning to adapt to emerging trends they are struggling to keep pace with rapid developments in AI. For example, the UK Online Safety Act made it illegal to share explicit images or videos that have been digitally manipulated but does not prevent the creation of pornographic deepfakes.<sup>25</sup>

The use of AI in the targeting and harassment of women and girls has been raised in the NI Assembly through an Assembly Motion by Cara Hunter MLA. The motion called for the Justice Minister to ensure robust criminal offences, enforcement powers and victim protections in Northern Ireland:

*"That this Assembly expresses grave concern at the documented use of artificial intelligence (AI) technologies to perpetrate online violence against women and girls; condemns the creation and dissemination of non-consensual intimate images, including AI-generated deepfakes, as a serious and escalating form of abuse; notes*

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<sup>21</sup> <https://www.technologyreview.com/2021/09/13/1035449/ai-deepfake-app-face-swaps-women-into-porn/>

<sup>22</sup> <https://www.securityhero.io/state-of-deepfakes/>

<sup>23</sup> Dangerous by Design Evidence for action on online violence against women and girls and the path to safer online spaces, Refuge and EVAW, September 2026  
<https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2026/09/Refuge-EVAW-Online-VAWG-Report-Sept-26.pdf>

<sup>24</sup> AI-powered online abuse: How AI is amplifying violence against women and what can stop it, UN Women, November 2025  
<https://www.unwomen.org/en/articles/faqs/ai-powered-online-abuse-how-ai-is-amplifying-violence-against-women-and-what-can-stop-it>

<sup>25</sup> AI-powered online abuse: How AI is amplifying violence against women and what can stop it, UN Women, November 2025  
<https://www.unwomen.org/en/articles/faqs/ai-powered-online-abuse-how-ai-is-amplifying-violence-against-women-and-what-can-stop-it>

*recent commitments by the UK Government to criminalise such activity; further notes the Department of Justice consultation on comparable proposals in Northern Ireland; and calls on the Minister of Justice to ensure that effective criminal offences, enforcement powers, and victim protections are in place no later than those in England and Wales.”*<sup>26</sup>

Government need to do much more to protect women and girls from AI-facilitated violence through enforcing robust regulations including strengthening laws and imposing accountability as well as integrating gender equality into global frameworks and holding technology companies to account.

UN Women has urged governments, development partners, and tech companies to *"strengthen safeguards and regulation of AI, ensure the equitable participation of women in AI development and decision-making, and address the risks these technologies pose to women and girls."*<sup>27</sup>

### **AI and the Impact on Jobs**

AI is reshaping the world of work and while it has the potential *"to transform how we work, deliver services and improve outcomes for people across Northern Ireland"*<sup>28</sup> its impacts are far from gender neutral. **We are concerned that the draft Strategy does not specifically address the impact of AI on women's work. Women face a much greater risk from AI because they are overrepresented in work which is more susceptible to automation further entrenching women's greater likelihood of economic vulnerability and likelihood of living in financial hardship/poverty.**

Research from the International Labour Organization (ILO) warns that Generative AI is set to affect women's jobs more than men's, with female-dominated occupations almost twice as likely to be exposed to the technology. In countries with available data, female-dominated occupations, such as business administration and clerical support, are almost twice as likely to be exposed to Gen AI as male-dominated ones such as construction, manufacturing and trade (29% versus 16%). They also face much higher automation risk (16% for female versus 3% of male-dominated occupations).<sup>29</sup>

The ILO research shows that women are disproportionately exposed to Gen AI for three main reasons: they are overrepresented in jobs most susceptible to automation; they remain underrepresented in AI-related and science, technology, engineering and mathematics (STEM) occupations and AI systems themselves often reflect and reproduce the gender biases embedded in societies.<sup>30</sup>

<sup>26</sup> <https://aims.niassembly.gov.uk/plenary/details.aspx?tbv=0&ptv=0&mcv=0&mtv=0&sp=0&spv=-1&per=1&it=0&pid=2&sid=p&pn=0&ba=1&doc=465932%20&fd=26/01/2026&td=26/01/2026>

<sup>27</sup> <https://www.escudodigital.com/en/technology/artificial-intelligence/ai-workforce-still-overwhelmingly-male-women-hold-just-22-of-jobs.html>

<sup>28</sup> <https://www.executiveoffice-ni.gov.uk/consultations/northern-irelands-draft-artificial-intelligence-strategy>

<sup>29</sup> Gen AI, occupational segregation and gender equality in the world of work, International Labour Organization, March 2026

<https://www.ilo.org/publications/gen-ai-occupational-segregation-and-gender-equality-world-work>

<sup>30</sup> Gen AI, occupational segregation and gender equality in the world of work, International Labour Organization, March 2026

<https://www.ilo.org/publications/gen-ai-occupational-segregation-and-gender-equality-world-work>

According to the latest Gender Snapshot 2026<sup>31</sup> women account for only around 22% of AI professionals globally and hold fewer than 14% of senior AI leadership positions. With women underrepresented from these jobs and from decision-making processes on how the technologies are developed and used there are concerns that the future of AI is being built without women's perspectives and without reflecting the diversity of the populations it is intended to serve.

AI systems which are trained on incomplete or biased data can reproduce and amplify gender inequalities, with consequences for recruitment, participation, promotion, pay, workplace monitoring and access to skills and resources. These risks are compounded for women at the intersections of multiple inequalities, such as race, ethnicity, or disability. The implications of Gen AI for gender equality are not limited to job loss. In many cases, the greater impact lies in how work is transformed—reshaping tasks, workflows, and the conditions under which women engage with work.<sup>32</sup>

What these findings highlight is the urgent need to embed gender equality in the design, deployment and governance of AI. This requires deliberate actions to ensure more representative datasets as well robust safeguards to prevent the reinforcement of gender stereotypes and biases in AI systems. Ensuring greater involvement of diverse stakeholders—particularly women and other underrepresented groups—in AI development is also essential to promote inclusive and equitable outcomes.<sup>33</sup>

## **AI and Environmental Impacts**

Building and running AI systems needs huge amounts of natural resources including electricity, water and raw materials. **While the draft Strategy does include 'Environmental Sustainability' as one of its eight AI principles, we do not believe that it goes anywhere near far enough to address the significant environmental impacts of AI usage and data centres and the impact on an already under pressure infrastructure.**

An article in View Digital magazine<sup>34</sup> highlights these issues locally and the pressure it puts on local infrastructure:

*"A single generative AI query uses up to 10 times more electricity than a standard internet search. Data centers demand so much electricity that local grids struggle to keep up, and cooling systems use millions of gallons of water, threatening local drinking and farm water in dry areas. Locally, this is all in the context of a publicly-owned water system, Northern Ireland Water, which is facing major network complaints regarding capacity limits and pollution. NI Water regularly objects to major planning applications in Belfast, on the grounds of lack of infrastructure."*

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<sup>31</sup> The Gender Snapshot 2026, UN Women

<https://www.unwomen.org/en/resources/gender-snapshot>

<sup>32</sup> Gen AI, occupational segregation and gender equality in the world of work, International Labour Organization, March 2026

<https://www.ilo.org/publications/gen-ai-occupational-segregation-and-gender-equality-world-work>

<sup>33</sup> Gen AI, occupational segregation and gender equality in the world of work, International Labour Organization, March 2026

<https://www.ilo.org/publications/gen-ai-occupational-segregation-and-gender-equality-world-work>

<sup>34</sup> <https://viewdigital.org/greens-fail-to-hold-up-belfast-councils-4-6-million-artificial-intelligence-plan/>

Kind Regards

A handwritten signature in blue ink, reading "Siobhán Harding". The signature is written in a cursive, flowing style.

Siobhán Harding  
Research & Policy Officer, Women's Regional Consortium