# AI Governance Beyond Formal Regulation: Insights from Information Governance Practices in Sociocultural Contexts

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**Abstract.** AI governance has rapidly evolved through the development of ethical principles, regulatory frameworks, risk management standards, and organizational policies aimed at ensuring the responsible and ethical use of AI. Existing discussions, however, continue to emphasise on formal governance mechanisms, including compliance structures, transparency, accountability, and various technical aspects of AI implementation. While AI systems are closely connected to humans as both users and affected subjects, less attention has been given to how governance is enacted within everyday organizational and sociocultural contexts. This paper argues that AI governance cannot be understood solely through formal regulatory and technical perspectives. Drawing on findings from a grounded theory study of information governance implementation in an Indonesian hospital, this paper highlights how governance practices are continuously shaped, negotiated, and reproduced through informal norms, workplace culture, and sociocultural dynamics. The study found that contextual social practices, such as informal norms and everyday adaptations interacted with formal governance mechanisms, resulting in negotiated, and sometimes ungoverned information handling practices in daily work settings. Building on these insights, this paper conceptually extends the discussion toward AI governance. As AI systems increasingly rely on organizational data, information flows, and human interaction, AI governance may similarly be influenced by informal practices, contextual adaptations, and local sociocultural conditions that cannot be fully addressed through formal regulations alone. This is particularly relevant as many existing AI governance frameworks are still largely shaped by Western regulatory and organizational assumptions. This paper therefore proposes the importance of a sociotechnical and practice-oriented perspective on AI governance, particularly within organizational settings in the Global South. The paper contributes to emerging discussions on contextual and socially embedded AI governance by emphasizing governance-in-practice rather than governance-as-policy alone.

**Keywords:** AI Governance, Information Governance, Sociocultural contexts.

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# 1 Introduction

The recognition of AI as a powerful smart agency has made governance a necessity [1]. In practice, AI has brought significant impact and change to how humans access, use, and search for information [2, 3]. The democratisation of AI use in recent years has made it possible for virtually anyone with internet access to easily use and benefit from AI. Given this remarkable potential and its increasingly massive development, AI governance has become indispensable to ensure that AI use remains within ethical boundaries and does not cause harm to its users [4], particularly as AI raises concerns related to privacy, bias, and harmful misuse [5].

Developed countries and several regions have anticipated and responded to the impact of AI use by establishing rules concerning AI use and how information is handled within such platforms, many of which are embodied in ethical principles, regulatory frameworks, risk management standards, and national or organisational policies aimed at ensuring responsible AI use, such as the EU AI Act (Regulation (EU) 2024/1689), which governs AI use in the European Union, the Blueprint for an AI Bill of Rights (2022), a policy framework intended to protect civil rights in the United States, and the Hiroshima AI Process, a global initiative to develop AI governance at the international level.

However, the various rules and regulations concerning AI remain largely dominated by formal perspectives, such as regulation, compliance, and technological or technical dimensions. These perspectives are undeniably important, yet in practice, AI is used massively by users, that is, by humans, while studies examining how AI is regulated from the users' own perspective remain relatively limited [3], for instance from the perspective of patients or physicians in healthcare settings [4]. As a result, existing formal regulations and studies have not sufficiently explained how governance is actually enacted in everyday practice, particularly within diverse organisational and sociocultural contexts.

AI systems are fundamentally closely connected to humans, both as users and as (potentially) affected subjects [6]. Understanding how humans understand, perceive, negotiate, and adapt formal rules related to AI into their everyday practices is therefore critical in determining how governance actually functions in practice, rather than merely how such formal rules are designed on paper. This phenomenon has begun to receive attention within information governance (IG) studies, yet remains underexplored in AI governance discourse.

Building on this premise, this paper argues that AI governance cannot be understood solely through formal, regulatory, and technical approaches. Practices at the practical level also require attention, as they shape how governance is enacted in everyday settings. Findings from a grounded theory study of IG implementation in a hospital in Indonesia demonstrate how governance practices are continuously shaped, negotiated,

and reproduced through informal norms, workplace culture, and sociocultural dynamics. The study found that formal governance mechanisms frequently interact with contextual social practices, such as informal norms (in this case, *kepo* (excessive nosines) and *gak enakan* (reluctance to confront)) and everyday adaptations, resulting in information handling practices that are adaptive, negotiated, and at times not fully governed in daily work.

Building on these findings, this paper conceptually seeks to extend the discussion from IG into the domain of AI governance. This extension is warranted because AI systems fundamentally depend on organisational data, information flows, and human interaction, all of which are likely also shaped by informal practices, contextual adaptations, and local sociocultural conditions that cannot be fully addressed by formal regulation alone. This is particularly relevant given that most existing AI governance frameworks remain largely shaped by regulatory and normative assumptions from Western contexts [2, 6], contexts that are generally more mature in terms of governance overall. This raises the assumption that such AI governance frameworks may not necessarily reflect governance dynamics in other contexts, such as countries with less established governance systems, including Indonesia.

Within the context of smart governance, social transformation, and green policy, all of which increasingly rely on AI systems and organisational data, understanding the practice-level and sociocultural dimensions of governance becomes crucial. This paper therefore proposes the importance of a sociotechnical, context-sensitive, and practice-oriented perspective in understanding AI governance, particularly within organisational settings in Indonesia. The contribution of this paper lies in enriching the discussion on contextual and socially embedded AI governance by emphasising governance-in-practice rather than governance-as-policy alone.

## 2 Literature Review

### 2.1 AI governance as a formal-regulatory-normative discourse

Floridi et al. [1] Prior to the surge in GPT adoption in the early 2020s, Floridi et al. [1] proposed an AI ethical framework grounded in good ethics, divided into five principles, four adapted from bioethics and one specific to AI. The four adapted from classical bioethics [7] are beneficence, that AI must bring benefit; non-maleficence, that AI must not cause harm; autonomy, that AI must preserve space for human decision-making; and justice, that the benefits and risks of AI must be distributed fairly. Floridi et al. [1] then added explicability, meaning that AI must be readily explainable and understandable to ordinary people, not only experts, so that end users can understand and hold AI developers accountable. While these principles are fundamentally necessary and important, it is equally important to recognise that it is ultimately the end users operating AI at the practical level who determine whether these principles are actually upheld in

the field. This points to the need for an additional layer of analysis addressing implementation at the micro/practice level, one that may be shaped by unwritten social norms and is not yet covered by existing AI frameworks.

Reddy et al. [5] offer a more specific governance model for AI in healthcare, centred on fairness, transparency, trustworthiness, and accountability as its main components. While these are equally important, the emphasis remains top-down and has not yet examined the implications for practice and norms already operating at the practical level.

Furthermore, the development or mapping of AI governance also remains centred on those holding authority, as illustrated by Sun and Medaglia [6], who show that AI adoption at the public level is more often examined from the perspective of key stakeholders, namely government, organisations, or large business entities. Interestingly, however, Sun and Medaglia's findings already touch on social challenges, showing that practical-level expectations influence how these stakeholders engage with AI. Their study also highlights that AI training data remains largely reflective of Western contexts, such that diseases commonly found in China are underrepresented in the AI systems they use, precisely because the datasets are Western-derived and such diseases are rarely found in Western populations. This illustrates the Western bias evident in Sun and Medaglia's findings.

That said, the authors themselves acknowledge that their approach is largely based on assumptions representing the European context, and remain open to findings and input from alternative approaches.

### 2.2 Shifting toward a sociotechnical, practice-based perspective

A small but growing body of literature has begun to push for a sociotechnical perspective within AI governance. Feng et al. [8] assert that the real-world impact of AI is always the outcome of an interaction between technical capability and broader social factors, including organisational structure, power dynamics, and cultural norms. Recent calls to adopt a more sociotechnical approach recognise that the social infrastructure surrounding technical infrastructure plays a crucial role in shaping governance decisions and efforts. The Center for Democracy and Technology and Data & Society [9] similarly emphasise that technical assessment alone is insufficient to govern AI, since real-world AI use is always embedded within larger social institutions and power relations.

At the organisational level, the concept of "keeping the organization in the loop" highlights how organisational practices, not merely formal rules, determine how AI is actually used and adapted in everyday work [10]. Nevertheless, much of this literature remains conceptual or based on case studies within Western technology/corporate sectors, with limited attention to how empirical findings from the information governance

(IG) domain, which has grappled earlier with issues of informal norms and everyday practice, might enrich this discussion.

### 2.3 Critique of Western bias in global AI governance frameworks

Techno-centric orientations remain dominant in how AI frameworks are built. For instance, Perez [11] shows that large language models (LLMs) predominantly reflect the cultural values of WEIRD societies (Western, Educated, Industrialised, Rich, Democratic) such as the United States, Australia, Canada, and the United Kingdom, while underrepresenting perspectives from countries such as Jordan, Pakistan, Indonesia, and Libya. Similarly, despite having around 200 million speakers, Indonesian-language datasets remain underrepresented across various research efforts [12]. That said, a related trend can be observed in recent artificial intelligence discourse, where the term "adaptive AI governance" has been coined to describe a governance framework that is flexible and capable of adjusting to different contexts, risks, and technological developments across regions [3]. However, this concept remains focused primarily on economic and political dimensions, without deeper engagement with the practical level. The authors also explicitly call for future research exploring how cultural values shape public perceptions of AI decision-making, a gap that this paper's study addresses.

### 2.4 IG as an empirical precedent

The domain of information governance (IG) offers a relevant empirical precedent. IG is commonly defined as an organisational framework for managing information throughout its lifecycle, supporting organisational strategy, operations, and regulatory compliance [13, 14]. However, much of the IG literature, including in the healthcare sector, remains dominated by a prescriptive-formal perspective: principles, frameworks, and maturity models, with limited attention to how informal norms and sociocultural dynamics affect implementation on the ground. This is precisely the gap addressed by the grounded theory study that forms the empirical basis of this paper, which found that formal IG mechanisms consistently interact with contextual social norms that are sometimes informal, producing information handling practices that are adaptive, negotiated, and at times not fully governed.

Using the IG framework proposed by Tallon, Ramirez, and Short [13], this study examines IG through three core practices: structural, procedural, and relational [13, 15]. This pattern is also evident in formal AI governance frameworks, which likewise focus primarily on structural and procedural dimensions, namely who is accountable (accountability structures), how risks are classified and mitigated (risk classification, audit), and compliance procedures [1, 5, 16]. However, the relational dimension, that is, how humans interacting with AI systems (developers, users, and affected subjects) negotiate, adapt, and interpret formal rules in everyday work, has received relatively little attention in the AI governance literature.

If, in the IG context, relational practices serve as the channel through which sociocultural norms reshape structural and procedural practices, a similar logic may apply

to AI governance: human interaction with AI systems in daily work, how employees interpret AI output, how they decide when to comply with or disregard system recommendations, how supervisors enforce (or fail to enforce) AI use policies due to social relational considerations, may constitute a similar channel through which sociocultural dynamics shape how formal AI governance actually functions in practice. This conceptual extension forms the core argument of this paper and will be elaborated further in the Discussion section.

## 3 Methodology

This paper is conceptual-argumentative in nature, drawing on the empirical results of a previously conducted grounded theory study on IG implementation in a hospital in Indonesia, with a focus on personal health information (PHI) management. The original study employed the grounded theory approach of Corbin and Strauss [17, 18, 19], through which the analysis and coding process identified patterns and categories in the data indicating ongoing efforts to integrate formal rules with informal social norms in IG implementation.

For the purposes of this paper, findings from that study, particularly the interaction between formal IG mechanisms and informal social norms, serve as the empirical basis for a conceptual extension into AI governance discourse. This approach is consistent with the principle of analytic generalization in qualitative research (as distinct from statistical generalization) [20], whereby the aim is not to claim that findings from a single hospital can be generalised directly to the entire AI governance context, but rather to demonstrate that the identified relational pattern between formal structure and sociocultural practice is conceptually relevant to other domains sharing similar characteristics, namely domains that similarly depend on information/data flows, human interaction, and organisational structure.

This paper therefore does not collect new data on AI use, but instead re-reads existing IG findings through an AI governance lens, with the aim of constructing conceptual propositions that can serve as a basis for further empirical research on AI governance-in-practice, particularly within Global South organisational contexts.

## 4 Findings from IG Study

### 4.1 Core Category

The core finding of this study is the identification of an ongoing integration effort within IG implementation, whereby the hospital, in implementing its IG, seeks to integrate formal IG regulations with informal social norms. This explains how IG implementation in the hospital in Indonesia unfolds through ongoing integrating efforts between formal IG rules and informal social norms, and how these efforts are shaped by multiple contextual conditions.

### 4.2 Informal Social Norms Observed in IG in Indonesia

Two informal norms emerged from the research site: *kepo* (excessive nosiness) and *gak enakan* (reluctance to confront). Within the studied hospital, this norm was explicitly acknowledged by senior management. One top-level manager noted: *"Indonesians can be very nosy (kepo) and love to dig into other people's business."* (Informant-TLM5). This suggests that managers recognised the need for clear accountability mechanisms to address *kepo*. However, the hospital's disciplinary mechanisms have not yet been effective in addressing this behaviour, as indicated by the continued presence of *kepo* in PHI-handling practices. As a result, kepo-driven interactions continue to shape how staff discuss or share information, even in situations where confidentiality should be maintained, for example while handling PHI.

The tendency of *gak enakan* (reluctance to confront) also emerged as an important sociocultural norm in the studied hospital. This reluctance to confront or correct colleagues reflects Indonesia's generally high collectivist culture, where group harmony is prioritised and conflict is avoided [21]. This attitude manifests in professional behaviour. One nurse explained:

> *"Generally, if it is someone I know, I might give a gentle reminder, like 'be careful with patient data.' But if it is someone I don't know, I rarely intervene. I am afraid it might cause conflict."* (Informant-NUR5).

Similar hesitation was observed in other situations, such as when staff encountered problems related to electronic health record (EHR) systems. One staff member reported: *"I usually contact the relevant unit directly or ask a colleague first. But sometimes I feel uncomfortable asking outside working hours."* (Informant-FU3). These accounts illustrate how social discomfort and the desire to preserve harmonious relationships influence staff decisions about whether to speak up, intervene, or seek clarification, even when PHI-related concerns are involved.

Taken together, *kepo* and *gak enakan* help explain how informal social norms shape everyday information-related interactions within the hospital. *Kepo* encourages curiosity-driven information sharing, while *gak enakan* discourages corrective actions or challenges to others' behaviour. These norms create tension with formal IG principles that emphasise confidentiality, accountability, and appropriate access to PHI. At the same time, because these behaviours are embedded in everyday routines, their influence often remains normalised and unnoticed. Both norms are frequently at odds with formal IG rules emphasising security, need-to-know access restrictions, transparency, and coordination in PHI management. Formal rules and informal norms are both present, yet not fully integrated, giving rise to tensions that affect IG implementation.

Findings further show that IG capability and awareness regarding privacy, risk, and data breaches remain low within the studied hospital, and that limited staff skills further amplify the influence of these sociocultural conditions.

### 4.3 Structural, Procedural, and Relational IG Practices

These conditions are further shaped by an imbalance in the hospital's capabilities, between its structural-technological dimension and its human factor dimension. From the management side, there is a clear commitment to compliance and to the adoption of formal IG rules, reflected in the provision of IT governance and infrastructure. However, capacity building for staff, particularly regarding IG understanding and practical skills in handling patient information and data, has not yet become a management priority. In addition, limited internal technological capability has led the hospital to rely on third-party vendors for EHR system development, which reduces flexibility and makes it more difficult to adapt systems to the practical demands of everyday work. It is this condition that allows sociocultural norms such as kepo and gak enakan to exert considerable influence in reshaping IG practice across the three levels below, given the absence of a strong counterbalance from the human capability side.

These sociocultural conditions in turn shape how integration efforts are enacted across three levels of IG practice:

- **Structural**: Management focuses on organisational compliance, such as developing internal regulations, meeting accreditation requirements, and conducting directing and monitoring activities. However, attention to how these policies are interpreted and enacted at the operational level remains limited, and tends to be overlooked based on the assumption that frontline staff already understand them.
- **Procedural**: Integration works relatively well when PHI lifecycle procedures can be adjusted to practical realities in everyday work. However, in certain situations, such as unusual cases or difficult working conditions, the interaction between low IG awareness, limited skills, and embedded social norms shifts staff priorities toward speed, convenience, and task completion, with limited consideration of regulatory compliance. As a result, tasks are still completed, but the methods used are not always consistent with existing policies or procedures.
- **Relational**: The hospital has provided formal communication channels, yet strong informal tendencies lead staff to rely more on informal approaches, such as face-to-face conversations, private messaging, or asking colleagues, rather than using formal channels or coordinating with supervisors when dealing with PHI-related issues. In some cases, management implicitly supports these informal channels, normalising their use and reducing the effectiveness of formal communication. This condition is further reinforced by the limited provision of structured training related to IG and PHI management.

### 4.4 Summary of Findings

Given these conditions and practices, efforts to integrate formal IG rules and informal social norms have not yet been fully achieved. Formal rules are present and adopted, but in many situations informal practices continue to take priority. This is not driven

solely by staff; management also contributes to the limited integration by focusing more on meeting organisational requirements than on practical implementation. As a result, formal IG rules have not yet been fully integrated with the informal social norms that persist within the hospital.

# 5 Discussion: Extending to AI Governance

## 5.1 From Informal Norms in IG to Similar Dynamics in AI Governance

Findings from this IG study highlight something important and interesting: social norms that exist within the hospital, such as *gak enakan*, cannot simply be regarded as something abstract, but have been shown to have the power to influence how staff make decisions when handling PHI. When a nurse describes feeling able to remind only those she knows to be careful with patient data, while being reluctant to intervene with strangers for fear of causing conflict (NUR5), or when another staff member admits discomfort in contacting the relevant unit outside working hours despite encountering an EHR system problem (FU3), the pattern that emerges is one where compliance with formal procedure gives way to the need to preserve social harmony.

A similar pattern is also very likely to occur in different settings, such as in human interactions with AI systems in the workplace. For example, If a staff member has doubts about an AI output or recommendation, but that output has already been "approved" or adopted by a supervisor or senior colleague, that staff member is likely to be reluctant to question or challenge the result, not because they are convinced it is correct, but out of the same *gak enakan*-type consideration: avoiding interpersonal conflict. This may also apply to the other social norm identified, namely kepo, which in the IG context drives staff to access or discuss information beyond their work needs. It may manifest in AI-related practice as a tendency for staff to probe data or AI output beyond their authorisation, purely out of curiosity, without considering the privacy or security implications of the data processed by the AI.

One of the challenges in governing AI lies in the sophistication of AI itself: AI largely operates behind the scenes, and not everyone understands how it works or how it generates a response from a given prompt. Yet without clarity on how AI works and who is accountable for its output, it is difficult to determine whether AI use is indeed beneficent, non-maleficent, autonomy-friendly, or fair [1]. The IG findings in this study suggest that improving understanding of how AI works needs to be carried out in a collaborative and co-constructive manner, so that ordinary end users can more wisely interpret and use AI responsibly, rather than relying on blind trust or, conversely, silent rejection out of reluctance to question it.

### 5.2 Toward Adaptive AI Governance

In line with Sun and Medaglia [6], building an AI governance framework requires an adaptive approach, one that balances flexibility in the face of rapidly changing environments with the need for stability and accountability that characterise the public sector [22, 23]. Findings from this study similarly point to the need for socially contextual IG, and a comparable pattern is evident in AI governance. In other words, the findings support the relevance of a collaborative and co-constructive approach that renders governance more adaptive. In practice, decentralised, collaborative, and co-constructive decision-making strategies can be applied by public sector managers by involving diverse stakeholder groups, not only those holding authority but also end users, in formulating their perspectives on AI, which are then integrated into the AI policy guidelines under development.

Because different levels of practice hold different views on the adoption of formal IG rules (as shown by the contrast between management and staff attitudes in Section 4.3), a similar pattern is likely to emerge in AI use within organisations: management may focus more on regulatory compliance for AI, while operational-level staff grapple with adapting AI recommendations to everyday work realities, including social pressure not to question or challenge their use. Given this characteristic, adaptive governance is considered capable of reconciling diverse perspectives on IG implementation in the hospital, and potentially on the challenges of AI adoption in the public sector as well.

The finding regarding the influence of informal norms in IG practice suggests that there are lessons to be drawn from different cultural conditions when implementing governance, a point with which Cath [2] concurs, arguing that AI governance also needs to incorporate concerns from the Global South. Cath cites Marda's findings in India, which show that there are considerations beyond the fairness, accountability, and transparency rhetoric that should inform what additional fundamental values ought to be included. This study's findings similarly show that there are dimensions not yet captured by Western-shaped AI frameworks that relate to local cultural context, reinforcing the relevance of this study's results.

In other words, the principle of adapting to sociocultural context, which underlies Adaptive Information Governance Implementation, is also relevant to AI governance. AI governance requires not only technical and regulatory mechanisms but also needs to accommodate the contextual knowledge of its users at the practical level in interpreting and applying AI recommendations [24]. AI governance going forward therefore needs to position users as key decision-makers who rely not only on domain expertise, such as physicians relying on medical knowledge [4], but also on an understanding of the organisational and sociocultural context in which AI is used. This study's findings on Adaptive Information Governance Implementation show that effective governance depends on the capacity to adapt policy and technology to local realities. AI governance therefore also needs to be designed adaptively, so that AI recommendations are not

applied rigidly but are instead interpreted based on professional judgment and the surrounding sociocultural context.

## 6 Implications for Smart Governance & Policy

AI policy for governance purposes is not easily formulated, given that AI does not present a single policy problem (for instance, how to protect the fundamental right to privacy), but rather a set of loosely connected problems, ranging from the protection of health and safety to a variety of other fundamental rights [25]. Findings from this IG study further reinforce the point that the complexity of governance cannot be viewed solely from a regulatory or technical standpoint, but must also address how it is actually carried out by its users. This has implications for the focal issues of this discussion: smart governance and social transformation.

Within the context of smart governance, AI systems are increasingly used to support decision-making in the public sector, ranging from healthcare services and administration to urban planning. This study's findings suggest that the success of smart governance is not determined solely by the sophistication of the AI system in use, but also by how social norms at the operational level shape its acceptance and use. Just as this study found hospital staff favouring informal over formal channels due to social relational considerations, government employees or public service staff may exhibit a similar tendency toward AI systems, for instance by avoiding the reporting of AI system anomalies or errors out of reluctance toward colleagues or superiors involved in the system's procurement. Effective smart governance therefore needs to design accountability mechanisms that account for these social relational dynamics, rather than relying solely on technical and compliance frameworks.

Within the context of social transformation, this study's findings underscore that effective AI governance requires a shift from a governance-as-policy approach toward governance-in-practice, one that recognises the active role of social norms, workplace culture, and interpersonal relations in shaping how technology is actually used. This is particularly relevant for Global South contexts such as Indonesia, where existing AI governance frameworks remain largely shaped by Western regulatory assumptions that may not actually reflect to local sociocultural dynamics, which can be unique. Social transformation toward a society better prepared to engage with AI therefore requires not only technical literacy but also social literacy: awareness of how cultural norms such as kepo and gak enakan can either strengthen or undermine the effectiveness of AI governance.

Accordingly, an adaptive, collaborative, and co-constructed approach among the various elements involved in AI becomes indispensable in AI policymaking and governance, whether for the purposes of smart governance, green policy, or social transformation more broadly.

## 7 Conclusion

This paper argues that AI governance cannot be adequately understood through formal, regulatory, and technical approaches alone. Drawing on findings from a grounded theory study on information governance (IG) implementation in a hospital in Indonesia, this paper shows how sociocultural norms, particularly *kepo* (excessive nosiness) and *gak enakan* (reluctance to confront), consistently interact with formal IG mechanisms, producing information handling practices that are adaptive, negotiated, and at times not fully governed.

Building on these findings, this paper conceptually extends the argument into the domain of AI governance, proposing that similar dynamics may also shape how AI systems are used, negotiated, and adapted within everyday organisational practice. The main contribution of this paper lies in emphasising the importance of a governance-in-practice perspective, rather than governance-as-policy alone, particularly for organisational contexts in the Global South that remain underrepresented in AI governance discourse dominated by Western assumptions. It further calls for a more context-sensitive and collaborative approach among stakeholders involved in shaping AI governance in any given setting.

It should be noted that this paper is conceptual-argumentative in nature and does not collect new empirical data on AI use. The conceptual extension from IG findings to AI governance is carried out through analytic generalization [20] rather than statistical generalization, meaning that the propositions put forward require further testing through empirical research, which constitutes a future direction for this line of inquiry. Future research is therefore needed to directly investigate how sociocultural norms influence AI governance practice within organisations, particularly in developing country contexts, in order to strengthen the sociotechnical, practice-based perspective proposed in this paper.

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**Abstract.** References

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