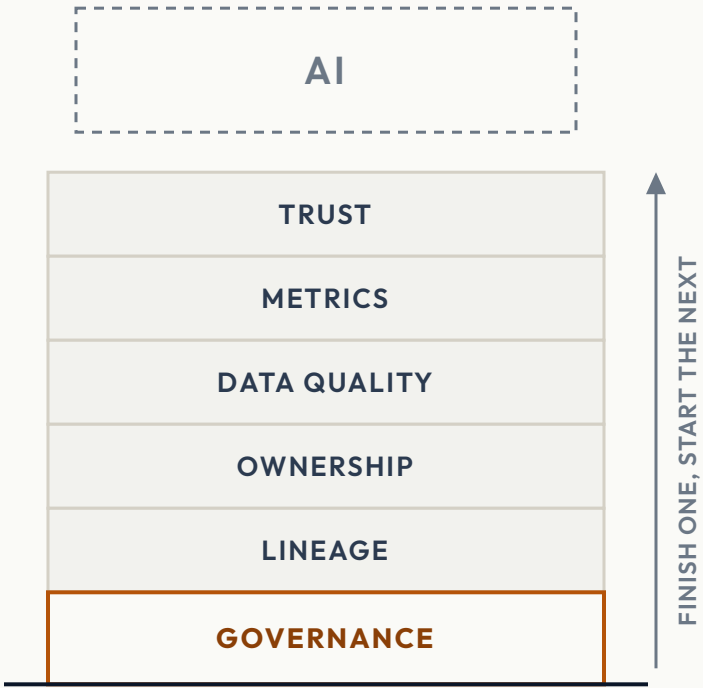


Governance is not the bottom brick.

One diagram is circulating in a dozen versions right now: a foundation of data work, with AI standing on top of it. **Its prose is right** — automating on data nobody checked ships errors faster. **Its picture is wrong**, and the picture is the part a board funds. A foundation is something you finish and build on. The three things that decide whether AI governance holds cannot be finished.

THE SHAPE IN THE FEED

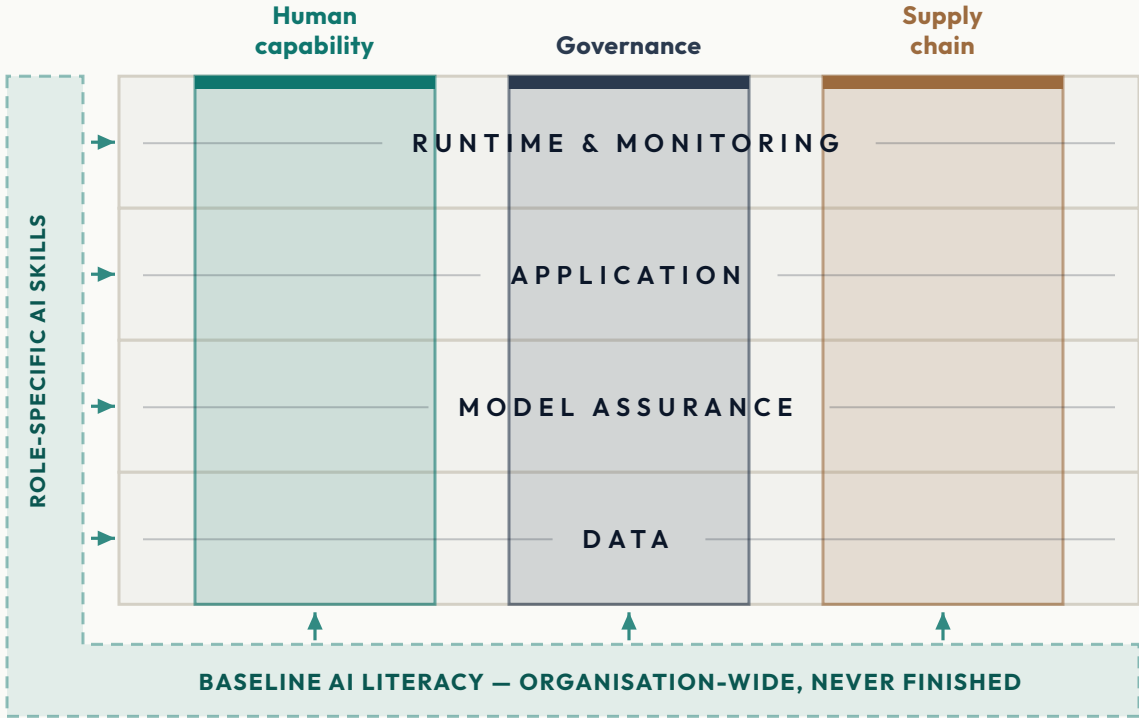
Build the foundation,
then put AI on it



Labels vary by author. The shape does not.
Nothing in the picture is a person.
The bottom course is the one a board funds once.

THE SAME CONTENT, RE-DRAWN

Four layers you build.
Three columns you keep.



A layer has a dependency order. It is not a schedule —
a team on a vendor API starts at the application layer.
A column carries load on every floor. Each one gets a named
owner with halt authority, a board cadence, and one number.

THREE THINGS THE FOUNDATION PICTURE CANNOT HOLD

01

Governance drawn as a course

A board funds a course **once**, at the bottom, and moves up. Governance has to hold on every floor above it — and where it does, **compliance is what it leaves behind**, not a stage you reach.

02

Nobody is in it

Six blocks, not one person. **A named owner for a dataset is not an owner with halt authority** — no budget line, no escalation, no power to stop a launch. The gate is specified and never staffed.

03

The supply chain is missing

Lineage traces data **inside your own estate**. It does not reach the third-party model you did not train or the vendor component you did not build — where most of the exposure now sits.

WHY THE DRAWING IS EXPENSIVE, NOT JUST WRONG

“Foundation first” is an instruction to defer. Read literally, it tells a board to fund a data programme that never reports done, and to hold AI behind it — the same sequencing that consumed a decade of warehouse budgets. The layers do have a dependency order. What they do not have is a start date you wait for. **Governance, capability and supply chain are not the thing you finish before AI. They are the things that have to be live while it ships.**

A foundation is finished, and then you stand on it.
A column is load-bearing on every floor.

What this sheet is: a corrective on a diagram *genre*, not on any one author — the left panel is a composite of the data-foundation pattern as it recurs across many versions, with the labels each author varies. No individual graphic is reproduced. **The model:** Columns Not Layers — four buildable layers on a dependency order, crossed by three columns that cannot be sequenced (human capability, governance, supply chain), on an AI-literacy substrate drawn as an L: the horizontal arm is the organisation-wide baseline that underwrites the columns, the vertical arm is that baseline applied as the role-specific skill each layer demands. **Regulatory note:** the AI-literacy duty in EU AI Act Article 4 has been in force since 2 February 2025; the 2026 Digital Omnibus softened it from ensuring a sufficient level of literacy to supporting its development — an obligation of effort, not of result. It was not deferred.