Client Update: Singapore

2024 JANUARY



Technology, Media & Telecommunications

Singapore Issues Draft Model AI Governance Framework for Generative AI

Introduction

Generative Artificial Intelligence ("AI") has proven to be a challenging development in the industry. On one hand, Generative AI brings significant transformative potential, over and above the opportunities presented by traditional AI. On the other hand, it has enhanced the inherent risks of AI while also raising new concerns.

Singapore has demonstrated keen efforts to facilitate the structured development of AI, as demonstrated in initiatives such as (i) launching the AI Verify Foundation ("AIVF"), which harnesses the collective power and contributions of the global open-source community to build AI governance testing tools; and (ii) the National AI Strategy 2.0, which outlines plans to deepen the use of AI to transform our economy.

In Singapore's latest move in the field of AI development, the AIVF and the Infocomm Media Development Authority ("IMDA") announced on 16 January 2024 that they have developed a draft Model AI Governance Framework for Generative AI ("Draft Framework"). This expands on the existing Model Governance Framework that covers traditional AI, last updated in 2020.

The Draft Framework seeks to set out a systematic and balanced approach to address Generative AI concerns while continuing to facilitate innovation. It looks at nine proposed dimensions to support a comprehensive and trusted AI ecosystem and offers practical suggestions that model developers and policymakers can apply as initial steps. AIVF and IMDA welcome views from the international community, which will support the finalisation of the Model AI Governance Framework in mid-2024.

In this Update, we highlight the key elements of the Draft Framework and the principles and recommendations contained therein.

Overview of Draft Framework

The development of the Draft Framework is based on the recognition that existing governance frameworks need to be reviewed to foster a broader trusted ecosystem, establishing a balance between protecting users and driving innovation. It also considers international discussions on topics of accountability, copyright, and misinformation, among others.

The Draft Framework thus aims to facilitate international conversations among policymakers, the industry, and the research community, to enable trusted development globally. It integrates ideas from earlier discussion papers on Generative AI and draws on earlier technical work to provide an initial



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catalogue and guidance on suggested practices for safety evaluation of Generative AI models. Further, it draws on practical insights from ongoing evaluations tests conducted within the Generative AI Evaluation Sandbox.

There are nine dimensions which the Draft Framework proposes to be looked at in totality:

- Accountability
- Data
- Trusted Development and Deployment
- Incident Reporting
- Testing and Assurance
- Security
- Content Provenance
- Safety and Alignment Research & Development
- Al for Public Good

Summary of Principles

Dimension	Summary	Highlighted Recommendations
Accountability	Putting in place the right incentive structure for different players in the AI system development life cycle to be responsible to end-users	 Allocating upfront responsibility based on level of control Safety nets for issues that are discovered thereafter Updating legal frameworks to make them more flexible
Data	Ensuring data quality and addressing potentially contentious training data in a pragmatic way	 Articulate how existing personal data laws apply to Generative AI Balancing copyright with data accessibility Facilitating access to quality data
Trusted Development and Deployment	Enhancing transparency around baseline safety and hygiene measures based on industry best practices in development, evaluation and disclosure	 Development – establishing baseline safety practices Disclosure – standardising a calibrated level of disclosure Evaluation – working towards a more comprehensive and systematic approach to safety evaluations while maintaining coherence between baseline and sector-specific requirements

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Dimension	Summary	Highlighted Recommendations
Incident Reporting	Implementing an incident management system for timely notification, remediation and continuous improvements	 Vulnerability reporting – incentive to act pre-emptively Incident reporting – developing processes for notification and remediation, and establishing proportionate reporting
Testing and Assurance	Providing external validation and added trust through third- party testing, and developing common AI testing standards for consistency	Fostering development of a third-party testing ecosystem • How to test – defining a testing methodology that is reliable and consistent • Who to test – identifying the entities to conduct testing that ensures independence
Security	Addressing new threat vectors that arrive through Generative Al models	 Adapting "Security-by-Design" Developing new security safeguards such as input filters and digital forensics tools for Generative AI
Content Provenance	Enhancing transparency about where content comes from as useful signals for end-users	 Designing policies to enable practical use in the right contexts Working with key parties in the content life cycle Standardising the types of edits to be labelled Providing users with greater understanding of content provenance
Safety and Alignment Research & Development	Accelerating research and development through global cooperation among Al Safety Institutes to improve model alignment with human intention and values	Accelerating research and development in model safety and alignment Promoting global cooperation in research and development
Al for Public Good	Harnessing AI to benefit the public	 Democratising access to technology Serving the public in impactful ways Upskilling of the workforce Ensuring sustainable growth

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Concluding Words

The move towards ensuring the controlled and structured development of Generative AI through policy and regulation is still in its early stages. Nonetheless, it is evident that the Singapore Government is pursuing a comprehensive framework that encompasses technical safeguards and standards, forward-looking policy considerations, and international cooperation. The Draft Framework is a prime example of this, providing a balanced and thorough layout for the future of Generative AI.

Al governance is an evolving and nascent space. The ongoing public consultation represents a valuable opportunity to shape policy-making and international discourse in this area. Industry stakeholders (including model developers, application deployers, and cloud service providers) should therefore carefully consider the elements of the Draft Framework, including any areas of concerns, uncertainty or potential operational issues.

Comments on the Draft Framework are to be submitted by 15 March 2024.

Should you have any questions or wish to submit feedback on the Draft Framework, please feel free to contact our team below.

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LAWYERS WHO KNOW ASIA

RAJAH & TANN ASIA

Technology, Media & Telecommunications

Contacts



Rajesh Sreenivasan Head, Technology, Media & Telecommunications

T +65 6232 0751

rajesh@rajahtann.com



Steve TanDeputy Head, Technology, Media & Telecommunications

T+65 6232 0786

steve.tan@rajahtann.com



Benjamin Cheong
Deputy Head, Technology,
Media & Telecommunications

T +65 6232 0738

benjamin.cheong@rajahtann.com



Tanya TangPartner (Chief Economic and Policy Advisor), Technology, Media & Telecommunications

T +65 6232 0298

tanya.tang@rajahtann.com

Click <u>here</u> for our Partners in Technology, Media and Telecommunications Practice.

Please feel free to also contact Knowledge Management at eOASIS@rajahtann.com

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Our Regional Contacts

RAJAH & TANN | Singapore

Rajah & Tann Singapore LLP

T +65 6535 3600 sg.rajahtannasia.com

R&T SOK & HENG | Cambodia

R&T Sok & Heng Law Office

T +855 23 963 112 / 113 F +855 23 963 116 kh.rajahtannasia.com

RAJAH & TANN 立杰上海

SHANGHAI REPRESENTATIVE OFFICE | China

Rajah & Tann Singapore LLP Shanghai Representative Office

T +86 21 6120 8818 F +86 21 6120 8820 cn.rajahtannasia.com

ASSEGAF HAMZAH & PARTNERS | *Indonesia*

Assegaf Hamzah & Partners

Jakarta Office

T +62 21 2555 7800 F +62 21 2555 7899

Surabaya Office

T +62 31 5116 4550 F +62 31 5116 4560 www.ahp.co.id

RAJAH & TANN | Lao PDR

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239 F +856 21 285 261 la.rajahtannasia.com CHRISTOPHER & LEE ONG | Malaysia

Christopher & Lee Ong

T +60 3 2273 1919 F +60 3 2273 8310 www.christopherleeong.com

RAJAH & TANN | Myanmar

Rajah & Tann Myanmar Company Limited

T +95 1 9345 343 / +95 1 9345 346 F +95 1 9345 348

mm.rajahtannasia.com

GATMAYTAN YAP PATACSIL

GUTIERREZ & PROTACIO (C&G LAW) | Philippines

Gatmaytan Yap Patacsil Gutierrez & Protacio (C&G Law)

T +632 8894 0377 to 79 / +632 8894 4931 to 32 F +632 8552 1977 to 78

www.cagatlaw.com

RAJAH & TANN | *Thailand* R&T Asia (Thailand) Limited

T +66 2 656 1991 F +66 2 656 0833 th.rajahtannasia.com

RAJAH & TANN LCT LAWYERS | Vietnam

Rajah & Tann LCT Lawyers

Ho Chi Minh City Office

T +84 28 3821 2382 / +84 28 3821 2673

F +84 28 3520 8206

Hanoi Office

T +84 24 3267 6127 F +84 24 3267 6128 www.rajahtannlct.com

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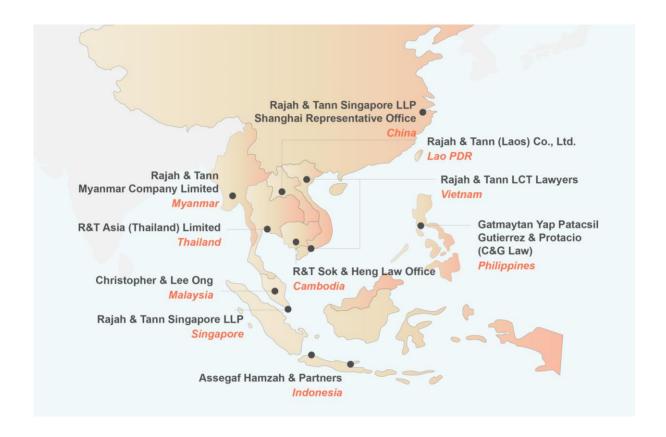
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