

Start with a GPAI model provider

- One-off process for model providers
- Implement SSF (Measure 7)
 - Include risk assessment measures, i.e. risk identification (Measure 8), risk analysis (Measure 9), evidence collection (Measure 10), and risk assessment lifecycle (Measure 11)
 - Include mitigation measures, their limitations, and processing for assessing adequacy of mapping (Measure 12)
 - Include development and deployment decisions (Measure 14)
 - Assign ownership for systemic risks (Measure 15)
 - Set up serious incident reporting process (Sub-Measure 18.1)
 - Set up process for responding to serious incidents (Sub-Measure 18.2)
 - Implement whistleblowing channels (Measure 19) and inform employees of AI Office mailbox (Sub-Measure 19.1)

Decision: GPAI model provider still operating?

- Continuous processes for model providers
- Assess adherence to and adequacy of SSF (Measure 16)
 - Independent expert review SSF and SSR (Measure 17)
 - Report serious incidents (Measure 18)
 - Notify AI Office on GPAI with systemic risk, SSF, SSR, and strong reason to believe substantial systemic risk to materialize (Measure 20)
 - Document adherence to Code (Measure 21)
 - Publish SSF and SSR (Measure 22)

Decision: Develop new model? (Measure 14)

- Before model training
- Put in place a copyright policy (Measure 3)
 - Update SSF and prepare evaluators (Sub-Measure 11.1)
 - Estimate amount of computational power use intended and notify the AI Office accordingly (Sub-Measure 20.1)
 - Create a Safety and Security Report (Measure 13)
 - Ensure proportionality (Sub-Measure 13.1) and equivalency (Sub-Measure 13.8)
 - Include results of risk assessment (Sub-Measure 13.2), results of safety mitigations assessment (Sub-Measure 13.3), results of security mitigations assessment (Sub-Measure 13.4), and cost-benefit analysis (Sub-Measure 13.5), sufficient detail on methodology (Sub-Measure 13.6), and review of all preceding items (Sub-Measure 13.7)

- During model training
- Comply to text and data mining (TDM) exception (Measure 4)
 - Publish rights reservation compliance (Sub-Measure 5.1), crawler name and robot.txt features (Sub-Measure 5.2)
 - Collect evidences regularly (Sub-Measure 11.2)
 - Update SSR (Measure 13)

- Before deployment decision
- Conduct risk identification (Measure 7)
 - Conduct risk identification (Measure 8) based on risk taxonomy (Measure 6)
 - Conduct risk analysis (Measure 9)
 - Collect evidence i.e. run evals (Measure 10)
 - Implement safety mitigations (Sub-Measure 12.1)
 - Implement security mitigations (Sub-Measure 12.2)
 - Conduct independent expert testing (Sub-Measure 17.1)
 - Update SSR (Measure 13)

Decision: Deployment decision? (Measure 14)

- At deployment
- Provide documentation to AI Office (Measure 1)
 - Provide documentation to downstream providers (Measure 2)
 - Include Acceptable Use Policy (Measure 2 Appendix)
 - Designate single point of contact for communication and complaints handling (Sub-Measure 5.3)
 - Write and update documentation of data sources and authorizations (Sub-Measure 5.4)

Deploy model

Decision: Model still in deployment?

- After deployment
- Collect evidences at least every six months (Sub-Measure 11.3)
 - Continuously gather information for risk assessment (Sub-Measure 11.4)
 - Implement security mitigations (Sub-Measure 12.2)
 - Update SSR (Measure 13)
 - Conduct independent expert testing (Sub-Measure 17.2)

End