AI Regulation Blueprint

A high-level blueprint for domestic regulation of civilian advanced AI models.

THREAT MODELS ADDRESSED

- Emergence of unexpected, dangerous behaviour
- Malicious use by known or low-resource bad actors
- Societal disruption from surprise release of a powerful model
- Concentration of power by model developers

THREAT MODELS NOT CURRENTLY ADDRESSED (BY DESIGN / FOR NOW)

- National security use of models
- Malicious use by unknown, high-resource bad actors
- Scenarios where deceptive alignment emerges with no prior warning between scaling steps
- Geopolitical conflict due to fear of "falling behind"

AUTHORED BY: Thomas Acton, … CREATED: [redacted]

CONTENTS

Governance Prerequisites

An overview of institutional, information, and technical capacities that governments will need to develop, implement, and enact these regulations. Includes a non-exhaustive, high-level sequence of projects. Dependencies, timelines, and resourcing will be determined by government. Each will require detailed scoping and resourcing.

Legend:
- Critical path for proof of concept
- Critical path for scaled regime
- Ongoing

Task Subgroup — Assessment and threshold calibration for frontier capabilities, including internal and external evaluations

Task Subgroup — Legislative opportunities, evidence base, and drafting of relevant secondary legislation

Task Subgroup — Assessment and threshold calibration for frontier capabilities, including internal and external evaluations

Task Subgroup — Legislative opportunities, evidence base, and drafting of relevant secondary legislation

Workstream — Establish a national AI safety institute (AISI) or equivalent function, or mandate to an existing body, to lead AI safety evaluations, research, and standard-setting. Duties and responsibilities include:
- Conducting and overseeing pre-deployment evaluations of frontier models
- Developing and maintaining evaluation benchmarks and testing infrastructure
- Publishing technical guidance and model cards
- Serving as the primary technical advisory body to government

Further Reading

Workstream — Establish a national AI safety institute (AISI) or equivalent function, or mandate to an existing body, to lead AI safety evaluations, research, and standard-setting. Duties and responsibilities include:
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Further Reading

Workstream — Assessment and threshold calibration for frontier capabilities, including internal and external evaluations

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Further Reading

I BEFORE TRAINING

START

For all diagrams: *Our user centric, 1st scenario! For those not familiar with AI risk yet or SKINNED for those more read*

What is this?

DEVELOPER wants to train a NEW large model

Is the developer an A SUBACTION/LIKE?

NO/MEH

Allowed to compute provider based on those Your Customer (KYC) requirements

What is the LEVEL of RISKS based on the model's expected capabilities?

LOW

MEDIUM

HIGH

BANDS

Training very high-risk models is a unique concept of harm.

Further Reading …

BLUEPRINT for LOWER (SPECIALISED)

Refer to other models which are specialised in a single, well-understood, and controlled capability and operational context. Can be considered for approval from a streamlined process.

Further Reading …

Does the DEVELOPER have PERMISSIONS to train high-risk models?

RISK FRAMEWORK

Seek permission for developing a high-risk model, e.g. by applying for a license from a regulatory authority. Can be granted approval from a streamlined process.

Further Reading …

CONDUCT RISK ASSESSMENT

Conduct initial internal risk assessment. Review by auditor. Report to national regulator.

Does initial risk assessment flag VERY HIGH RISKS not captured by the process required for permission?

II TRAINING FOR BROAD COMPETENCE Includes self-supervised learning & capability development

TRAIN MINIMAL VIABLE MODEL

Submit to third party evaluation. Log with national regulator.

Further Reading …

Minimal viable model displays unexpected risky behavior ?

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D work found enabled to better understand and mitigate this behaviour.

Further Reading …

TRAIN LARGER MODELS ITERATIVELY

Train until reaching target size, while submitting intermediate checkpoints for third party evaluation and logging with national regulator.

Further Reading …

Unexpected risks during scaling?

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D work found enabled to better understand and mitigate this behaviour.

III SPECIALISATION Training for specific behaviours, goals or tasks

IDENTIFY DOMAINS

Identify domains / use cases where the model's capabilities could prove beneficial

DESIGN TRAINING REGIME

Design training regime to specialise in the identified domain(s), submit to external audit, log with regulator.

Further Reading …

TRAIN TO SPECIALISE

Train model to specialise in identified domain(s) until appropriate reward signal(s).

Does specialisation lead to perverse / unexpected behaviours?

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D work found enabled to better understand and mitigate this behaviour.

IV PRE-DEPLOYMENT

RUN PRE-DEPLOYMENT

RED TEAM

What harmful behaviours can experts elicit from the model?

PUBLIC ELICITATION

Given demonstrations, what does the public think about the model's potential benefits and risks?

Model benefits outweigh risks?

STOP DEPLOYMENT

Report to national regulator. Responsibly publish R&D work found enabled to better understand and mitigate this behaviour.

DESIGN ACCESS MECHANISMS

Design appropriate access regime(s) (e.g. restricted API) for model. Submit to third party evaluation. Log everything with national regulator.

Further Reading …

V EXCLUSIVITY PERIOD

PREPARE AND RELEASE REPORT

Prepare and release research and policy report on the benefits of initial deployment.

ROLL OUT GRADUALLY

Monitor for misuse and unexpected behaviours

MANAGE INCIDENTS

Establish incident reporting and redress mechanism. Establish adversarial testing and bounty programme.

PREPARE LIABILITY REGIME

Prepare liability regime for harms caused by the model due to developer negligence.

SCALE UP ROLL-OUT

Monitor for misuse and unexpected behaviours

ADDRESS ISSUES AS THEY COME UP

Share best practices with technical community and national regulator.

VI PUBLIC DOMAIN

CONDUCT AUDIT

Conduct 3rd party audit of model risk against the most uncontroversial landscape

Given experience with the model, and the broader sociotechnical context, is the model deemed dangerous?

RELEASE MODEL

Model is released to the public under the framework of open source

TRANSFER OWNERSHIP

Transfer model to ownership by national body or international body for open source

TOOLS, IP, REGULAR REFORMS

CONTRIBUTE!

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COMMENT AND CODE ON THIS DOC

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(NOT EXHAUSTIVE)

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AUTHORED BY
Shahar Avin

CREATIVE
Cotton Design

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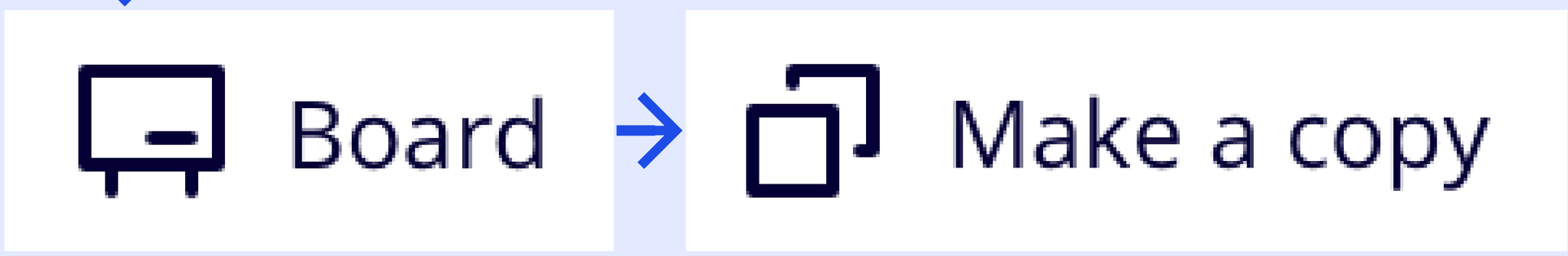

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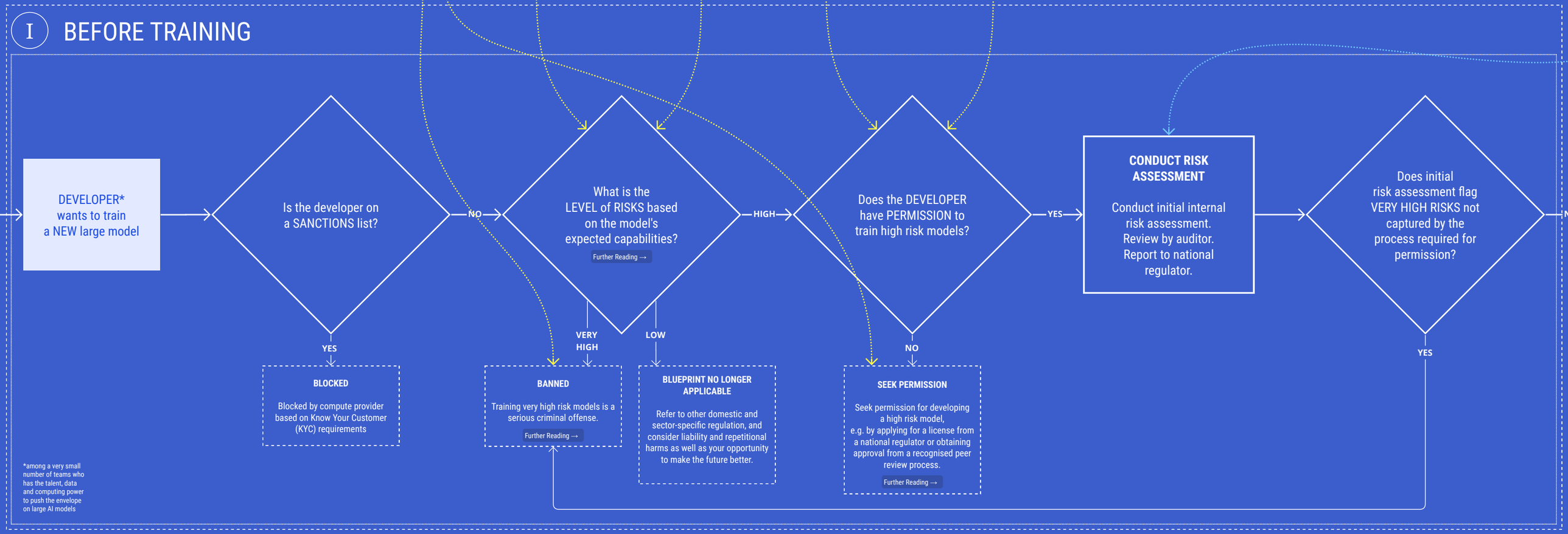
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BEFORE TRAINING
DEVELOPER* wants to train a NEW large model
Is the developer on a SANCTIONS list?
NO
YES
BLOCKED
Blocked by compute provider based on Know Your Customer (KYC) requirements
What is the LEVEL of RISKS based on the model's expected capabilities?
Further Reading →
VERY HIGH
LOW
BANNED
Training very high risk models is a serious criminal offense.
Further Reading →
BLUEPRINT NO LONGER APPLICABLE
Refer to other domestic and sector-specific regulation, and consider liability and repetitional harms as well as your opportunity to make the future better.
HIGH
Does the DEVELOPER have PERMISSION to train high risk models?
NO
SEEK PERMISSION
Seek permission for developing a high risk model, e.g. by applying for a license from a national regulator or obtaining approval from a recognised peer review process.
Further Reading →
YES
CONDUCT RISK ASSESSMENT
Conduct initial internal risk assessment. Review by auditor. Report to national regulator.
Does initial risk assessment flag VERY HIGH RISKS not captured by the process required for permission?
YES
*among a very small number of teams who has the talent, data and computing power to push the envelope on large AI models

Shortcut to Node

II TRAINING FOR BROAD COMPETENCE

Includes self-supervised learning & capability development

TRAIN MINIMAL VIABLE MODEL

Submit to third party evaluation. Log with national regulator.

Minimal viable model displays unexpected risky behaviour?

NO

TRAIN LARGER MODELS ITERATIVELY

Train until reaching target size, while submitting checkpoints to 3rd party evaluation and logging with national regulator.

Further Reading →

Unexpected risks during scaling?

YES

YES

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D alert. Fund research to better understand, predict and mitigate the behaviour.

Further Reading →

III SPECIALISATION

Training for specific behaviours, goals or tasks

IDENTIFY DOMAINES

Identify domaines / use-cases where the model's capabilities could prove beneficial.

DESIGN TRAINING REGIME

Design training regime to specialise in the identified domain(s), submit to external audit, log with regulator.

TRAIN TO SPECIALISE

Train model to specialise in identified domain(s) using appropriate reward signal(s).

Does specialisation lead to perverse / unexpected behaviours?

YES

STOP DEVELOPMENT

Report to national regulator.
Responsibly publish R&D alert.
Fund research to better understand, predict and mitigate the behaviour.

IV PRE-DEPLOYMENT

RUN PRE-DEPLOYMENT

RED TEAM
What harmful behaviours can experts elicit from the model?

PUBLIC ELICITATION
Given demonstrations, what does the public think about this model's potential benefits and risks?

Model benefits outweigh risks?

YES

DESIGN ACCESS MECHANISMS

Design appropriate access mechanisms (e.g. monitored API). Prepare model card. Log everything with national regulator.

Further Reading →

NO

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D alert. Fund research to better understand, predict and mitigate the behaviour.

V EXCLUSIVITY PERIOD

PREPARE AND RELEASE REPORT
Prepare and release research paper / technical report while mindful of misuse potential

Further Reading →

ROLL OUT GRADUALLY
Monitor for misuse and unexpected behaviour.

MANAGE INCIDENTS
Establish incident reporting and redress mechanism, Establish adversarial testing and bounty programme.

Further Reading →

PREPARE LIABILITY REGIME
Prepare liability regime for harms caused by the model due to developer negligence.

SCALE UP ROLL-OUT

Monitor for misuse and unexpected behaviour.

ADDRESS ISSUES AS THEY COME UP

Share best practices with technical community and national regulator.

Following an exclusivity period of some years

VI PUBLIC DOMAIN

THEN, AT REGULAR INTERVALS

CONDUCT AUDIT

Conduct 3rd party audit of model risk against the new sociotechnical landscape

Given experience with the model, and the broader sociotechnical context, is the model deemed dangerous?

YES

TRANSFER OWNERSHIP

Transfer model to ownership by national body or international consortia for safe operation

Further Reading →

NO

RELEASE MODEL

Model released as open-source (by developer or another actor)

Further Reading →

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(BY DEFAULT/TBD)

- National security use of models
- Malicious use by unknown, high-resource bad actors
- Scenarios where deceptive alignment emerges with no prior warning between scaling steps
- Geopolitical conflict due to fear of "falling behind"

AUTHORED BY Markian Kuzio
CREATED Caitlin Maslowski

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This represents the direction of flow

Governance Prerequisites

Legend
- Prerequisite not started
- Prerequisite in progress
- Complete

I BEFORE TRAINING

START

DEVELOPER* wants to train a NEW large model

Is the developer on a SANCTIONS list?

BLOCKED

Blocked by computer provider based on Know Your Customer (KYC) requirements

What is the LEVEL of RISKS based on the model's expected capabilities?

LOW

RISKS

Training very high-risk models is a serious criminal offense.

MEDIUM

BLUEPRINT for LOWER (PPLICABLE

HIGH

Does the DEVELOPER have PERMISSION to train high-risk models?

RISKS

Training very high-risk models is a serious criminal offense. Criminal and civil penalties, including asset seizure, can be sought for these crimes.

DENIED

Seek permission for developing a high-risk model, e.g. by applying for a license from a regulatory agency. Do not proceed without formal written approval.

CONDUCT RISK ASSESSMENT

Conduct initial internal risk assessment. Review by auditor. Report to national regulator.

Does initial risk assessment flag VERY HIGH RISKS not captured by the process required for permission?

*Or other entities, to comment on these recommendations, we've split up a "DEVELOPER" for shorter-sized words.

What is this?

II TRAINING FOR BROAD COMPETENCE

Includes self-supervised learning & capability development

Starting point for Phase 2

TRAIN MINIMAL VIABLE MODEL

Submit to third-party evaluation. Log with national regulator.

Minimal viable model displays unexpected risky behavior ?

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D work. Fund research to better understand and mitigate the identified risk.

TRAIN LARGER MODELS ITERATIVELY

Train until reaching target size, while monitoring for unexpected risks. Submit to third-party evaluation and logging with national regulator.

Unexpected risks during scaling?

III SPECIALISATION

Training for specific behaviours, goals or tasks

IDENTIFY DOMAINS

Identify domains / use cases where the model's capabilities could prove beneficial

DESIGN TRAINING REGIME

Design training regime to specialise in the identified domain(s), submit to external audit, log with regulator.

TRAIN TO SPECIALISE

Train model to specialise in identified domain(s) until appropriate reward signal(s).

Does specialisation lead to perverse / unexpected behaviours?

STOP DEVELOPMENT

Report to national regulator. Responsibly publish R&D work. Fund research to better understand and mitigate the identified risk.

IV PRE-DEPLOYMENT

RUN PRE-DEPLOYMENT

RED TEAM

What harmful behaviours can experts elicit from the model?

PUBLIC ELICITATION

Given demonstrations, what does the public think about the model's potential benefits and risks?

Model benefits outweigh risks?

STOP DEPLOYMENT

Report to national regulator. Responsibly publish R&D work. Fund research to better understand and mitigate the identified risk.

DESIGN ACCESS MECHANISMS

Design appropriate access regime (e.g., monitored API, limited release, open release). Log everything with national regulator.

V EXCLUSIVITY PERIOD

PREPARE AND RELEASE REPORT

Prepare and release research and safety report detailing the benefits of model's potential.

ROLL OUT GRADUALLY

Monitor for misuse and unexpected behaviours

MANAGE INCIDENTS

Establish incident reporting and redress mechanism. Establish adversarial testing and bounty programs.

PREPARE LIABILITY REGIME

Prepare liability regime for harms caused by the model due to developer negligence.

SCALE UP ROLL-OUT

Monitor for misuse and unexpected behaviours

ADDRESS ISSUES AS THEY COME UP

Share best practices with technical community and national regulator.

VI PUBLIC DOMAIN

CONDUCT AUDIT

Conduct 3rd party audit of model risk against the real sociotechnical landscape

Given experience with the model, and the broader sociotechnical context, is the model deemed dangerous?

RELEASE MODEL

Model is released to the public (or to a more limited set of actors)

TRANSFER OWNERSHIP

Transfer model to ownership by national body or international body, or safe operator

TOOL AT REGULAR INTERVALS

Further Reading

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AUTHORED BY
Shahar Avin

CREATIVE
Cotton Design

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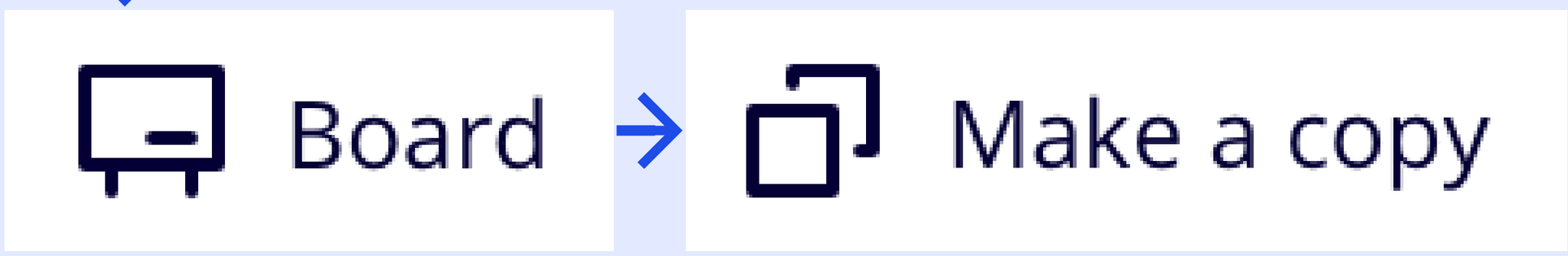

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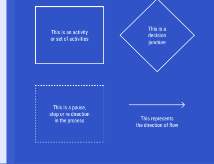

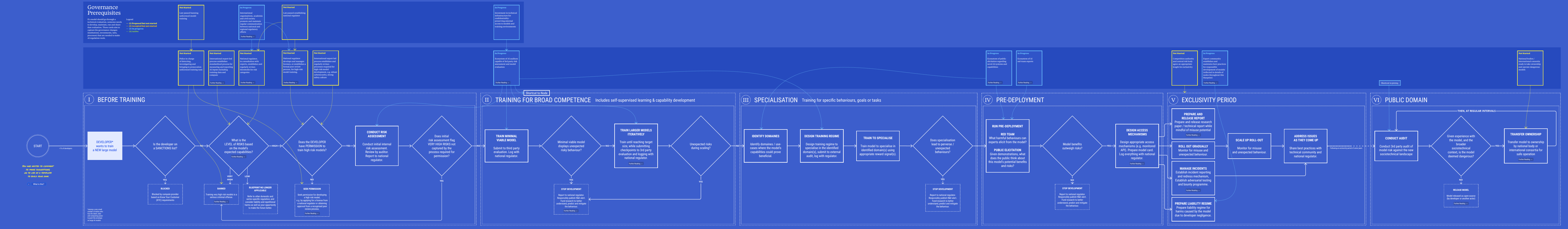

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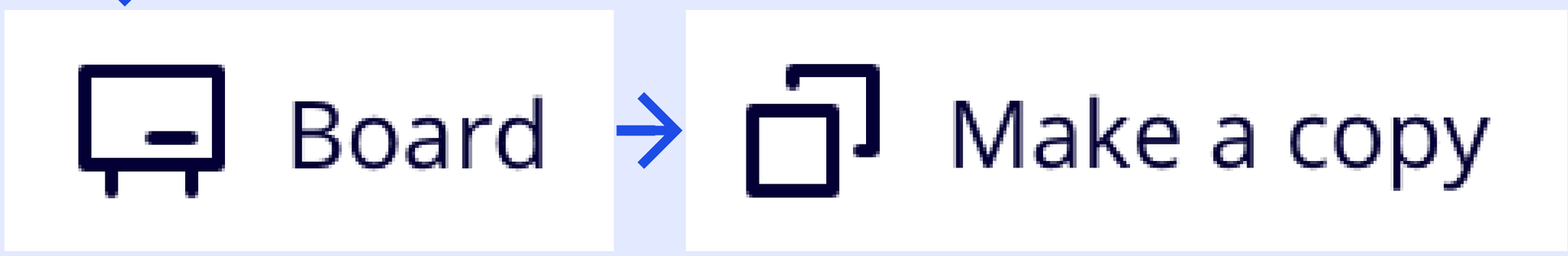

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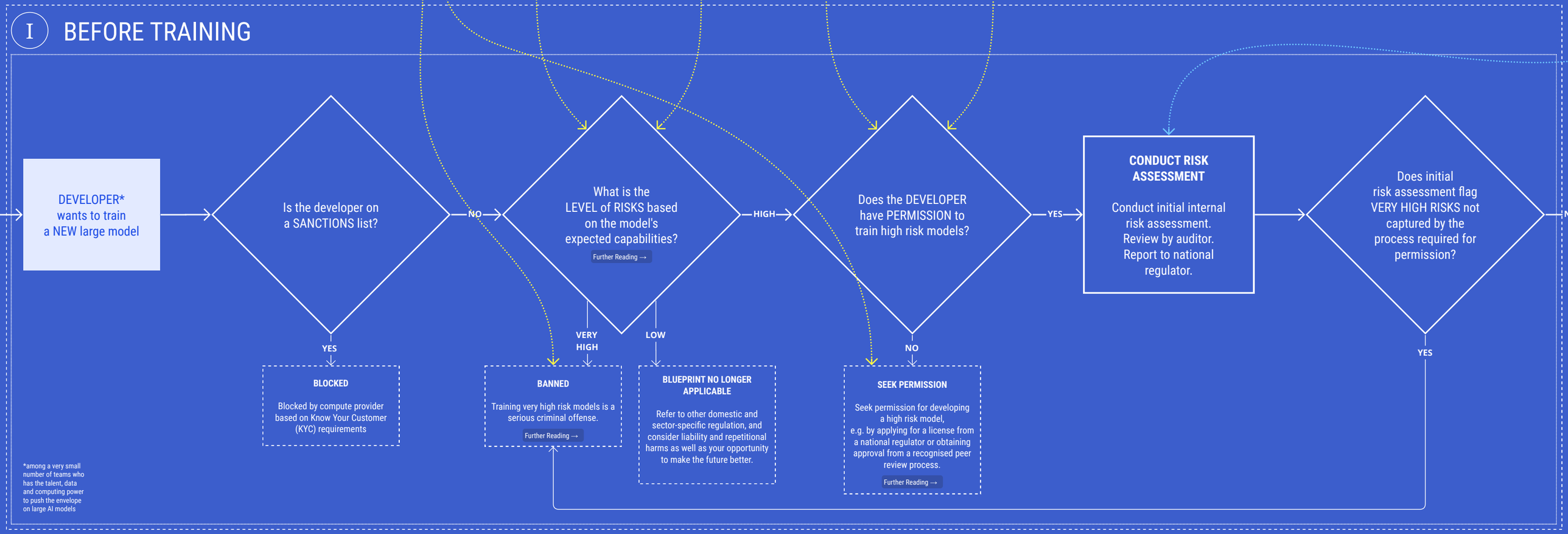
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AUTHORED BY
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CREATIVE
Cotton Design

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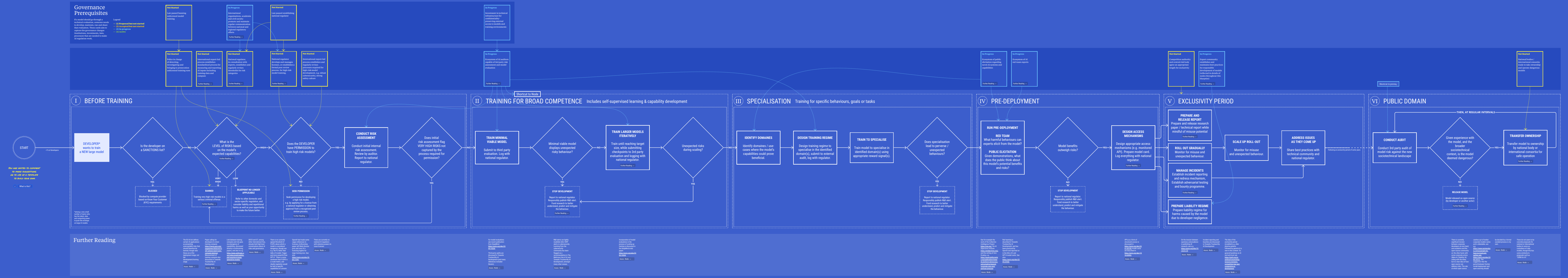

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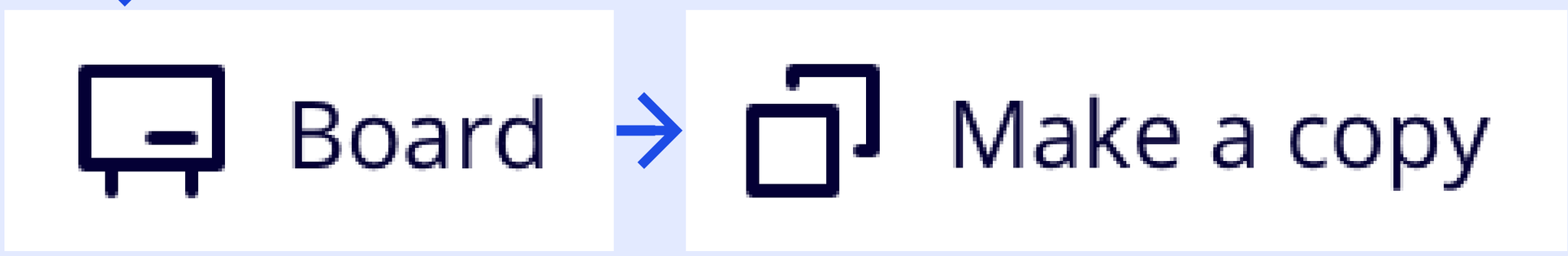

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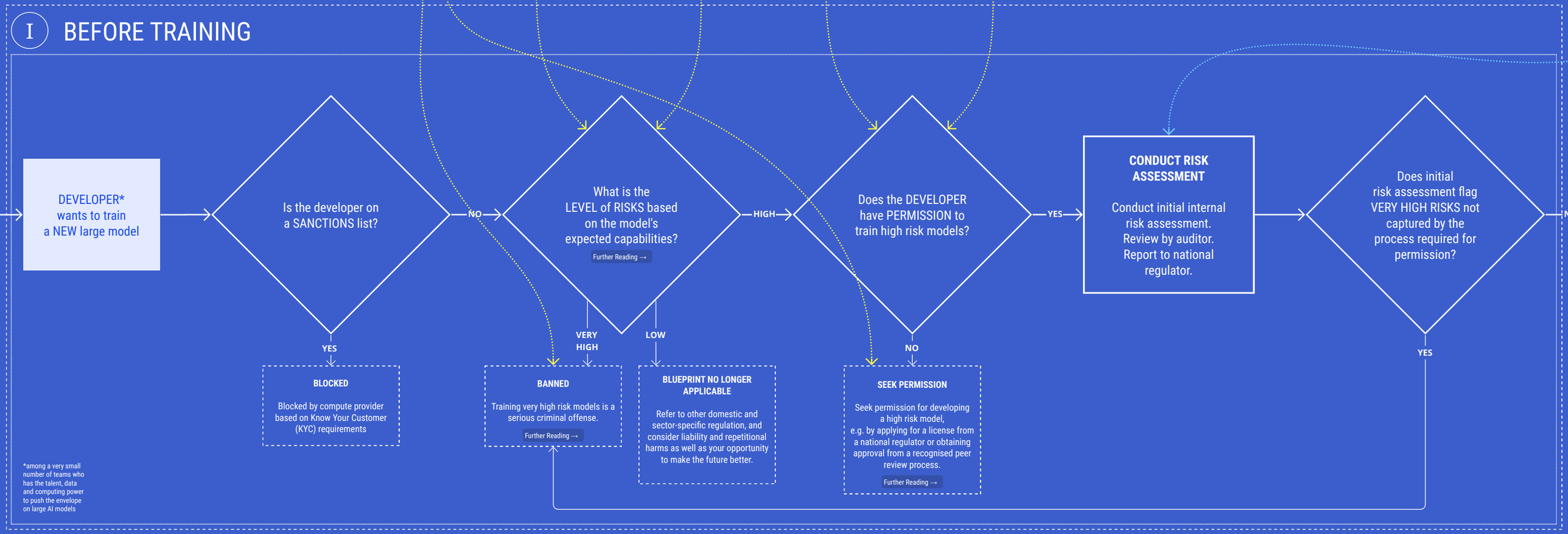
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Governance Prerequisites

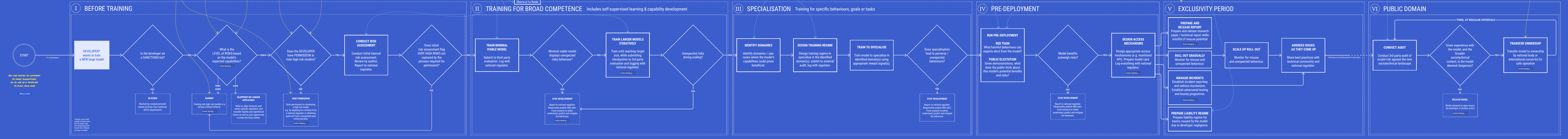
If a model should go through a technical evaluation, someone needs to develop, maintain, run and share that evaluation. These cards aim to capture the governance changes (institutions, investments, laws, processes) that are needed to make AI regulation work.

Legend

— (1) Proposed but not started
— (2) Accepted but not started
— (3) In progress
— (4) Active

Not Started

Law passed banning unlicensed model training



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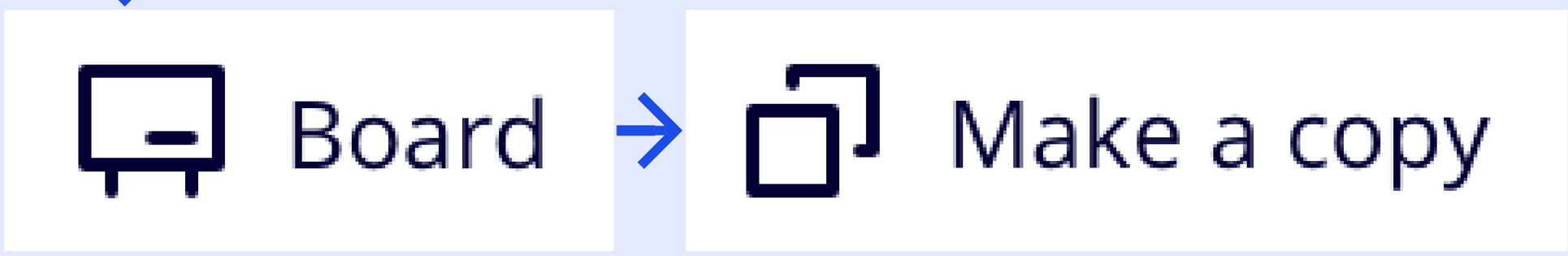

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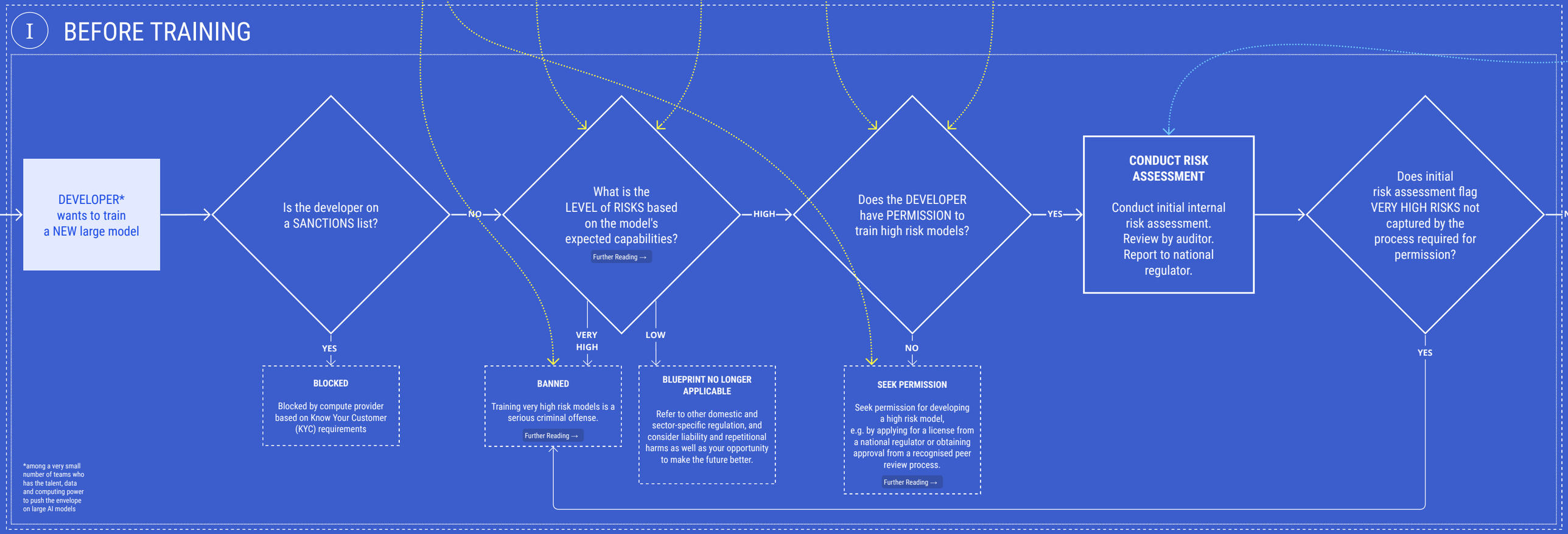
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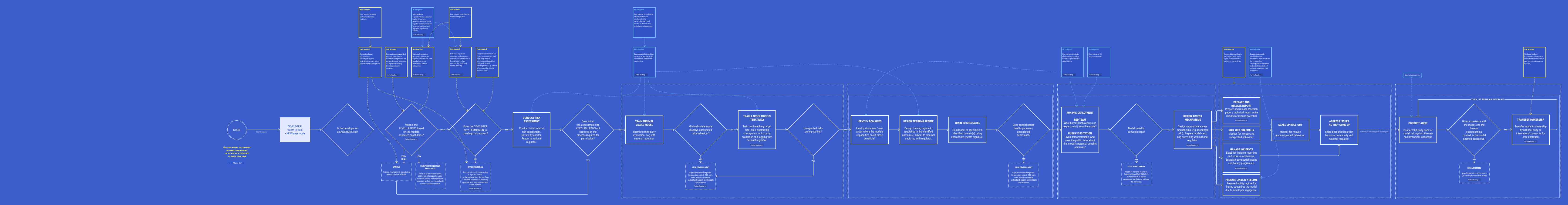
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