



**Whitepaper  
Generative AI Policy**

**A Comprehensive Analysis and  
Recommendations for  
EU and US Local Governments**

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# Executive Summary

This whitepaper encapsulates a risk-based approach that can help provide a robust scaffold for EU and US local governments keen on leveraging Generative AI, GAI, for urban innovation.

We also examine the City of San Jose's Generative AI Policy and discuss the approach they have outlined. By adapting and implementing the recommendations delineated herein, local governments can adopt a GAI policy and navigate the complex landscape of modern urban governance, ensuring the responsible, transparent, and effective deployment of GAI technologies.

With the aid of additional services, training, and community engagement, local governments can work towards creating a well-rounded, compliant, and measured GAI policy, allowing for a new epoch of urban innovation, and enhanced public service delivery.

## Call to Action:

Local governments are urged to engage in a thorough review and refinement of their AI policies, utilizing the extensive insights and recommendations encapsulated in this whitepaper.

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By partnering with our expert consultancy services, local governments can significantly benefit from our tailored advice and solutions aimed at nurturing a responsible, transparent, and innovative urban governance ecosystem empowered by GAI. Our consultancy services excel in providing in-depth analysis, strategic AI governance frameworks, and proactive measures to enhance community engagement and policy effectiveness. Through a collaborative venture, local governments can seamlessly integrate GAI solutions. Our dedicated team of consultants stands ready to safeguard transformative change, fostering a culture of trust and accuracy in the realm of AI-powered urban governance.

## Introduction

The dawn of the digital era has ushered in a suite of technologies with the potential to significantly alter the landscape of governance and public service delivery. Among these, the highly sophisticated capabilities of artificial intelligence (AI) have skyrocketed its popularity across many industry sectors globally, with the public sector standing as a notable arena for its application. Cities worldwide are embarking on journeys to position themselves as harbingers of urban innovation through the assiduous development and deployment of AI systems. This burgeoning interest is mirrored by an increasing number of local government agencies, which are exploring AI technologies to bolster their operational frameworks, deliver on policy mandates, and engender efficiencies in the face of uncertain and complex urban environments. Also, Smart City initiatives aim to integrate digital technology, information and communication technologies to enhance the quality of life for citizens, optimize urban functions and drive sustainable growth.

At the forefront of this innovation wave lies GAI, a form of artificial intelligence that not only processes but also creates new data. GAI holds the promise of catalyzing urban innovation by enabling a new breed of solutions for myriad

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challenges that modern urban centers grapple with. From optimizing resource allocation, enhancing public engagement, analyzing traffic and mobility, to forecasting urban development trends, GAI emerges as a pivotal tool in the arsenal of local governments. This exploration into GAI is timely, with the exponential growth of digital technologies and their integration into the public sector.

## **Usefulness of GAI**

**It is important not to underestimate the areas where GAI may be used within local governments, taking advantage of well-designed prompts, even without deployment of custom-built applications. For example, AI and GAI tools can be used in:**

- (a) Asset management.**
- (b) Service automation.**
- (c) Building management.**
- (d) Business efficiency.**
- (e) Communication and complaints.**
- (f) Data analytics.**
- (g) Enforcement tasks.**
- (h) Maintenance work.**
- (i) Public service delivery.**
- (j) Service efficiency.**
- (k) Urban infrastructure, and**
- (l) Waste Management.**

**This wide range of application areas indicate the high potential of AI infiltration soon in local governments to generate impact on the council operations and services.” See (Perception of AI in Local Governments) in Literature Review below.**

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## GAI Guidelines – City of San Jose

The City of San Jose has ventured into the realm of Generative Artificial Intelligence (GAI), a burgeoning branch of AI capable of generating content like text, images, and music upon user request. While the spectrum of global organizational responses to GAI spans from outright bans to unrestricted use, San Jose opts for a controlled, responsible, and risk-based approach. This stance is rooted in a vision to harness the **efficiency-enhancing potential of GAI while conscientiously mitigating risks pertaining to AI bias, privacy, and cybersecurity.**

The policy of the City of San Jose's GAI Policy (the GAI City Policy) is limited to users interacting directly with a GAI tool, such as ChatGPT. It does not yet extend to the use of custom-built applications which can be developed using GAI to assist in a myriad of local government tasks.

The City Policy outlines a set of foundational rules for City staff and other stakeholders engaging with GAI in official capacities:

- All information input into GAI systems like ChatGPT is deemed public under the Public Records Act (PRA) of California, underscoring a culture of transparency and caution in data handling.
- The human user holds the responsibility for reviewing, revising, and fact-checking the outputs generated by AI, ensuring accuracy and reliability.
- Usage of GAI should be properly cited and recorded, promoting accountability and traceability.
- A dedicated account for City use is mandated to streamline and monitor the utilization of GAI.

In addition, with its risk-based approach, the GAI City Policy sets out three categories of risks:

- **Mid-risk**
- **High-risk.** High-risk tasks “require thorough review at the time of generation before using in any work context. Particular care should be taken when a task may impact individuals differently across factors such

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as race, age, gender identity and disability (e.g., a memo about tree canopy inequity in neighborhoods).”

- **Prohibited**

Furthermore, the GAI City Policy emphasizes a periodic review of the guidelines in alignment with evolving technology, laws, and industry best practices. It provides a structured approach towards assessing risks associated with different use cases of GAI, alongside examples and additional guidance on critical aspects like understanding and mitigating the risks of information breach and adverse impact.

However, as expressly stated in the GAI City Policy, it is only the start of a collaborative journey towards comprehensive AI policy development, and the City aims at pooling together diverse experiences to co-create the City's AI policies. So, the Policy should not be seen necessarily as final or definitive. The Policy, as laid down on July 20, 2023, sets a pragmatic and forward-looking precedent, advocating for a balanced, collaborative, and informed engagement with GAI to navigate the intricate landscape of modern urban governance.

This whitepaper endeavors to dissect the San Jose GAI policy, assess its applicability and potential enhancements for local governments in the EU and the US, and outline additional services that can aid these local governments in the establishment and integration of their own GAI policy, including offering training, and conducting risk assessments. Through an analysis, comparative examination, and pragmatic recommendations, this whitepaper aims to provide a robust scaffold for local governments keen on leveraging GAI to foster urban innovation and bolster public service delivery.

## **Methodology**

The examination of the GAI City Policy and its subsequent comparative analysis for EU and US local governments was orchestrated through a methodological framework, ensuring a robust, well-rounded, and objective analysis. This section

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delineates the methods employed in dissecting the policy and contextualizing it for the EU and US local government landscapes.

## Literature Review

A literature review was conducted to understand the foundational principles, existing frameworks, and prevailing challenges associated with the implementation of GAI in a) organizations generally and b) public sector governance. This also encompassed a review of emerging GAI policies and guidelines in selected EU and US local governments.

As well as the GAI City Policy, the few policies and templates that we referenced include:

- Policy for ChatGPT - The Corporate Governance Institute: Having a policy for ChatGPT wasn't on any company's to-do list a year ago. Corporate Governance Institute. What should a ChatGPT or AI usage policy contain? (Policy for ChatGPT, CGI)
- Generative AI (ChatGPT) Policies that Empower Innovation While Safeguarding Your Business
- Guidelines for Using Generative AI - Boston.gov: The City of Boston Interim Guidelines for Using GAI provides guidelines for the responsible use of AI-generated content, emphasizing the need for proofing, editing, fact-checking, and using AI-generated content as a starting point, not the finished product. (Guidelines, Boston)

### [Guidelines for Using Generative AI \(boston.gov\)](#)

- Sample Policy: Using Generative Artificial Intelligence (AI) at Work - Brotherhood Mutual: This sample policy provides guidelines for the responsible use of generative artificial intelligence (AI) at work, emphasizing the need for transparency, accountability, and ethical considerations (Sample Policy, Brotherhood)

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Sample Policy: Using Generative Artificial Intelligence (AI) at Work - Brotherhood Mutual

## Policy Analysis

The GAI City Policy was analyzed through a multi-pronged approach:  
Content Analysis: A thorough content analysis was carried out to understand the policy's objectives, guidelines, and operational directives. Here the Corporate Governance Institute's Template provided an initial content checklist. Note that every organization is different, and each organization should conduct its own risk assessment to determine what GAI policy clauses should be put in place.

Comparative Analysis: The policy was juxtaposed with the identified GAI policies in selected EU and US local governments to ascertain similarities, differences, and areas of improvement.

Other sources relevant to GAI policies in local government were consulted. These include the results of local government surveys, conducted to garner insights into the challenges of local governments and their goals and constraints, were reviewed, namely:

- Artificial intelligence in local governments: perceptions of city managers on prospects, constraints and choices. AI & Society. Explores city managers' perspectives on the opportunities, limitations, and decision-making regarding AI adoption in local governments. (AI Perceptions, AI & Society)

[Artificial intelligence in local governments: perceptions of city managers on prospects, constraints and choices | AI & SOCIETY \(springer.com\)](#)

- Guidance on public authorities' use of AI (Guidance, Danish Data Protection Authority)

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[Ny vejledning om offentlige myndigheders brug af AI og kortlægning af AI på tværs af den offentlige sektor \(datatilsynet.dk\)](#)

Other relevant sources used in this analysis:

- Artificial Intelligence Action Plan - NYC: This report outlines New York City's plan to ensure that artificial intelligence is used responsibly and equitably to improve the lives of New Yorkers (Action Plan, NYC)

[Artificial Intelligence in Action for NYC](#)

- Responsible Use of Technology: The Salesforce Case Study The case study delves into operationalizing technology ethics within Salesforce, emphasizing the company's ongoing efforts in ethics, inclusion, and accessibility. (Case Study, Salesforce)

[Responsible Use of Technology: The Salesforce Case Study | World Economic Forum \(weforum.org\)](#)

- Foundation models in the public sector. Ada Lovelace Institute. Examines the adoption and implications of AI foundation models in the public sector, focusing on benefits, risks, and governance. (Foundation models, Ada)

[Foundation models in the public sector | Ada Lovelace Institute](#)

- AI Risk Management Framework. NIST. Provides guidelines on fundamental considerations public authorities need to make before developing AI solutions, including guidelines on the basis for processing, duty to inform, and risk assessment. (RMF, NIST)

[AI Risk Management Framework | NIST](#)

An assessment was undertaken to ascertain the compliance of the GAI City Policy with EU and US legal and regulatory frameworks governing AI, data protection and intellectual property.

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## Results from Analysis of the GAI City Policy

First, we examined the foundation of the GAI City Policy, including the scope including principles, policy objectives, target audience, and frameworks used. These are all particularly important in any such policy.

### Scope

The document outlines the guidelines for using GAI by City staff and associated personnel during city-related tasks. It does not cover personal or unrelated business uses of GAI. Here organizations should consider whether specific use cases, identified as higher risk, warrant additional provisions to the basic GAI policy or whether there should be multiple policies for specific parts of the organization or processes. In terms of policy development, it is often advisable to have a general policy and then work out where additional provisions are required.

The GAI City's Policy states that "Generative AI presents an incredible opportunity for people to increase their efficiency and efficacy in work." It can help readers of the policy to understand the permitted usages of GAI. See GAI (ChatGPT) Policies and the GAI Policy of the Brotherhood Mutual, which states that the GAI tools are meant to enhance human work.

### Policy objective

The objective of reducing the risks to an acceptable level without posing undue burdens on users could be added to the GAI City Policy.

### Target Audience

Users in the Policy include staff, contractors, or others using GAI for City work purposes.

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## Frameworks

There may well have been an AI risk or governance framework used here, although there is no mention of it in the document itself. A useful reference framework here is the RMF (RMF, NIST). The RMF is useful in this context as it has a reasonable taxonomy of the risks to AI that organizations may face and some guidance on the usage of AI.

Local government organizations should conduct a risk assessment on the usage of GAI, to determine the mitigations, including the measure in the GAI City Policy.

## Principles

The inclusion of principles in the GAI City Policy, as the City has done, is appropriate. The included principles serve to guide the audience of the policy in general, in interpreting the provisions of the policy and where any further guidance is lacking. The policy includes principles relating to:

### **Privacy:**

Ensuring the protection and confidentiality of personal and sensitive data that may be handled or generated by AI systems.

### **Accuracy:**

Ensuring that the information generated or processed by AI systems is correct, precise, and free from errors.

### **Transparency:**

Ensuring openness and clarity about how AI systems operate, how decisions are made, and how data is handled.

### **Fairness:**

Ensuring that AI systems operate in a manner that is just, equitable, and free from discrimination.

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**Absence of Bias:**

Ensuring that AI systems do not exhibit or perpetuate biases, and that measures are in place to identify and correct biases.

**Accountability:**

Ensuring that there are mechanisms for responsibility and answerability for the decisions made and actions taken by AI systems.

To these principles, should be added the following for completeness:

**Security:**

Ensuring the protection of AI systems and data from unauthorized access, cyber threats, and other potential harms.

**Reliability:**

Ensuring that AI systems function consistently and reliably, delivering the expected outcomes.

**Interpretability:**

Ensuring that the workings of AI systems can be understood and interpreted by humans, particularly when it comes to decision-making processes.

**Explainability:**

Ensuring that the decisions made by AI systems can be explained in understandable terms to stakeholders, including those affected by those decisions.

**Empowerment of the Workforce:**

Ensuring that the deployment of AI technologies serves to augment and empower the workforce, enhancing their capabilities and supporting their roles rather than replacing or undermining them.

As well as these principles, it is also important to emphasize the importance of community engagement, collaboration among different stakeholders, and public-private partnerships in advancing a GAI policy and implementation. See Foundation models, Ada.

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Also, when delving into analysis and formulating recommendations for organizations aspiring to implement a GAI policy, the distinct nature of each organization needs to come to the forefront: Varied use cases for GAI, coupled with differing levels of risk tolerance, underscore the uniqueness of each organizational context. Moreover, the diverse cultural, legal, and societal frameworks between the EU and US could steer local governments towards distinct policy choices. For instance, the legal landscapes governing data protection and privacy markedly differ between the EU and US, epitomized by the EU's General Data Protection Regulation (GDPR). Additionally, the content, language and tone of a GAI policy ought to be tailored to resonate with the societal contexts inherent to EU and US local governments, ensuring relevance, resonance, and adherence to local norms and expectations.

### Guidelines

The GAI City Policy is referred to as “Guidelines.” Depending on the organization's nomenclature for policies and related documents, the document should ideally be labeled a policy to reinforce their mandatory nature.

## Legal Compliance

The policy needs to ensure adherence to applicable European and US laws and regulations concerning AI, data protection, and public records.

For GAI policies in the EU, the GDPR and FOI laws, which are like the Public Records Act, apply. The upcoming AI Act is also applicable, though it may only have minimal impact on local governments as users, rather than developers and deployers of AI here. Lastly, intellectual property laws may have a dual impact upon the usage of the AI generative tool. These are considered in turn.

### GDPR

The General Data Protection Regulation (GDPR) of the European Union significantly impacts how organizations, including local governments, process personal data in the European Union. When it comes to using AI technologies



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including GAI, several considerations under the GDPR come into play, to protect the rights of data subjects, including:

- Data Processing
- Data Minimization
- Transparency and Informing Data Subjects
- Rights of Data Subjects
- Data Protection by Design and by Default
- Data Accuracy and Quality
- Security Measures
- Accountability and Documentation
- Data Protection Impact Assessment (DPIA)
- Data Processor and Data Controller Relationships

If personal data is to be shared with the GAI tool, all of these considerations above may come into play.

Here, the GAI City Policy, although advocates being privacy friendly, does not appear to expressly prohibit sharing personal data with GAI Tools, but rather requires the removal of personal information from generated output before publishing.

So personal data may be shared with the GAI Tool.

**However, to meet the requirements of the GDPR, it is advisable to have a mandate in the policy that no personal data should be shared with GAI Tools, at least not without the approval of the organization's data protection officer who may first check compliance with the GDPR.**

The data minimization principle in the GDPR requires that only the necessary data should be processed by the GAI tool to fulfill the intended purpose, though there may well be use cases by a local government where such a necessity can indeed be shown. Also, depending on the GAI tool, it may not be possible in practice to allow for the exercise of the data subject's rights to access, rectify and delete their personal data which has been shared with a GAI tool. Lastly, the security of the GAI tool would also need to be assessed before allowing the

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sharing of any personal data. Fortunately, the power of GAI Tools can still be used using techniques to strip personal data. See for example Annex I. In any event, the GDPR requires an assiduous approach to data protection when employing GAI tools, necessitating a clear understanding and adherence to its principles and requirements. This aligns with ensuring that the rights and freedoms of individuals are upheld in the face of advancing AI technologies. In terms of policy documents, in practice a separate, robust policy on GDPR plus the aforementioned ban on sharing personal data, except with the approval of the DPO will suffice here.

## **Freedom of Information Laws**

Like the public records laws, FOI laws are designed to promote transparency and accountability in the public sector and create mechanisms for the public disclosure of information.

The GAI City Policy cautions not to share any information with GAI tools which is not meant for public release. However, when AI systems like GAI tools are utilized by public bodies, there may be a necessity for transparency in how these tools are used, the kind of data they process, and the decisions they inform. Furthermore, the algorithms and data handling processes behind AI systems might need to be disclosed or explained to comply with FOI requests, ensuring that the public understands how decisions are being made and how information is being handled.

Therefore, in these instances it is imperative to include in a GAI policy that there needs to be a record of how the tool is used, the data which is shared with the tool and the purpose for which the tool is used.

The City's form, referenced in their policy, already collects much of this information, but it should be clearer that it is necessary to capture and record all information that is shared with the GAI tool (not only the initial prompt and text) and that the use of the form is mandatory.

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## Upcoming Artificial Intelligence Act (EU) on GAI

In the upcoming AI act, there are likely to be far reaching and complex obligations on providers who would be required to ensure compliance even before a GAI tool is made available on the market or put into service. If the organization is developing its own model, these provisions would apply and would need to be included in an organization's policy. However, for users only using provisioned GAI models, there will not likely be additional obligations.

## Intellectual Property Considerations

Intellectual property laws are relevant to two aspects of GAI:

- a) The collection of data used to train the GAI model. That is, the creative work that others have created may have been used to feed the GAI tool. This means that GAI output created by the organization may infringe other's copyright or trade secrets. Therefore, it is prudent to check whether the output may infringe other's works, especially graphical output, but text could also well be infringing. Whether there exists an indemnity by the tool provider for such an infringement should be checked by the legal department of the organization during procurement. Even so, it is prudent to check the output for potential infringement claims, and the GAI policy should reflect this. The GAI City Policy does not go this far.
  
- b) The output of the GAI tool should not be regarded as being copyright protected, at least in the EU., though recognition may well be forthcoming in the UK. ([Generative AI: is its output protectable by intellectual property rights? - Osborne Clarke | Osborne Clarke](#))

The text in the GAI (ChatGPT) Policies Reflects this lack of copyright protection. This is then different to other output of the organization where AI is not involved in its creation, which may well attract copyright protection. The developing case law for copyright appears to suggest that AI creation alone is insufficient to give

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rise to copyright protection. Therefore, the policy should caution that any GAI tool output may not attract protection and so the output may be copied by others without fear of infringement. The City's Policy already includes such caution. The GAI (ChatGPT) Policies also include that as well as complying with applicable laws and regulations, users should consult with appropriate legal counsel or management if they have questions about regulatory requirements.

## **Bias and Discrimination Mitigations**

The strategy in the GAI City Policy of ensuring that output of the GAI tool should be thoroughly reviewed by multiple users before any document is finalized or action is taken is appropriate.

## **Transparency and Explainability Measures**

Evaluations and decisions are prohibited under the GAI City Policy, as generally speaking GAI tools are not good at explaining their reasoning. It should be made clear that this applies to all decision making, not just high-risk decision making. This could be relaxed if there is a human in the loop to check the input from AI, if the decision and the accountability for the decision remains with the user. Even so, an organization should still guard against AI over-reliance, such as by conducting regular inspections to assess the quality and independence of decision making.

## **Employee Training and Capacity Building**

The policy should address the training needed for employees and others using the GAI on behalf of the City. This is typically included in the overall training policy and plans. There may well need to be specific training for distinct groups of employees based on their interaction with the GAI tools, if the use cases are different. This may well need to include digital literacy in AI, as well as the risks

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associated with using GAI. Some of the content of the GAI City Policy e.g., Be Aware of Targeted Cyber Attacks is more suited to training material than inclusion in the policy itself.

## Accountability and Responsibility Mechanisms

There should be detailed descriptions of roles and responsibilities of various personnel and departments involved in AI deployment and oversight.

The GAI City Policy is clear about the responsibilities of users, multiple users (for document reviews) and the role of supervisors. However, there should still be checks of the usage in practice by independent parties to ensure that the mandates of the policy are being followed properly. This can be quite a challenge for some organizations to ensure that checks are being made.

However, a policy alone, without a responsible work culture, without training and a form of auditing will not keep the responsible lid on GAI.

There should also be procedures for reporting and addressing GAI-related issues. These may well be combined with existing organizational procedures.

## Policy Enforcement

A statement that failure to comply with the policy may result in consequences for the user, such as disciplinary action is appropriate to help ensure compliance with the policy. See for example, GAI (ChatGPT) Policies Ethical Considerations and Community Engagement:

There should be measures for engaging with the community to gather feedback on AI applications and policies and procedures for public disclosure and discussion of AI deployments and outcomes.

To ensure ethical usage and prevent potential impact on vulnerable populations, there should be inclusion of such stakeholders. Possibilities include opening the workgroup or sharing the policy with such stakeholders to increase transparency and trust in the usage of AI.

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Salesforce included external representative bodies to help identify for example harmful language in its communications based on AI. See Case Study, Salesforce.

## Continuous Monitoring, Evaluation, and Improvement

As mentioned, there should be mechanisms and roles defined for regular evaluation of AI systems' performance, impact, and compliance with legal and ethical standards.

**For higher risk use cases, the organization should deploy tools to determine whether information was generated by GAI or other AI tools in violation of company policy. See GAI (ChatGPT) Policies**

### **Technology Procurement and Development:**

There should be provisions for assessing, procuring and developing GAI tools. The risk is otherwise that, for example, insecure tools are employed. The GAI should then include or reference a list of GAI tools that have been assessed and are permitted.

## Incident Response and Reporting Mechanism

Procedures for responding to AI-related incidents, including data breaches or system failures. For example, there should be a reporting mechanism for usage of the GAI tools which is not in accordance with the Policy.

Policy Review, Update and Stakeholder Feedback:

Processes for reviewing and updating the GAI policy to reflect legal, technological, and societal changes should be adopted, as per other policies.

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## Our Recommendations

### Conducting an Initial Risk Assessment

As a starting point, the organization should conduct a risk assessment, and create risk profiles based on their business and operational model. Establish and clearly identify risk categories (i.e., prohibited, high-risk or mid-risk). The GAI City Policy has examples.

Before using GAI, users must assess the risks associated with each task, categorizing them as Prohibited, Authorized, or Permitted. See example in appendix section. It is pragmatic to have an expanding list of areas (e.g., as an appendix to the policy) where it is authorized to use GAI, once the usage has been assessed.

However, it is important to ensure that any such risk assessment of GAI is undertaken with risk management professionals and stakeholders, including stakeholders who are proficient with GAI tools, who can accurately assess the risks and impacts, using recognized risk management frameworks. The risk assessment should be conducted in a thorough and systematic manner to ensure that all potential risks associated with the usage of a GAI tool are identified, analyzed, and mitigated effectively. It's also important to maintain a proactive approach by continuously monitoring and reviewing the GAI tool and its usage.

Many local governments may struggle to find the necessary internal resources with the requisite knowledge to perform such an assessment. See AI Perceptions, AI & Society

### Utilizing Tools to Ensure Data Privacy in AI Generative Tools Input



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Use trustworthy tools to ensure that personal data is not shared with GAI Tools. **For example, we provide a listing of a case study of a health facility where we implemented an opensource tool for anonymizing sensitive information.**

**Note 1:** This tool does not remove other sensitive data, such as intellectual property. Nor is any such tool perfect, so the user remains responsible to check that no personal data is shared.

**Note 2:** We partner with commercial vendors that can anonymize, tokenize or remove sensitive data as well.

Any such tool to remove personal data should be:

- Flexible and complete to handle the different instances of personal data
- Open source or independently verified to ensure that the tool itself does not raise further privacy or security concerns in its usage.
- Easy to use to ensure that it will gain acceptance by users.

## **Operationalizing Recommendations and Integrating Policy Frameworks**

A GAI policy needs to be part of the AI governance of the organization. This includes making sure that there is a policy owner for the GAI policy.

To ensure an integrated and consistent policy landscape, a GAI policy needs to be correctly placed within the context of other policies, including:

- Data Protection Policy
- Intellectual Property Policy
- Generic AI Policy
- Cybersecurity Policy

As well as having the necessary users trained, the GAI policy needs to be published so that it is visible to the users.

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## Service Offerings

We can provide additional services you can provide to local governments and other organizations to assist with the establishment and integration of a GAI policy. These include:

- **Policy Establishment:** Assisting with the process of customizing and implementing an AI policy and or a GAI policy.
- **AI Governance Establishment or Review:** Provide assistance in setting up an AI City Steering Committee, an Algorithmic Review Committee, an AI Risk assessment and Project Review Process and an external advisory network.
- **Training:** Providing training programs for local government staff.
- **Risk Assessments:** Conducting risk assessments including appropriate stakeholders according to well-established risk frameworks. Similarly, assistance in assessing GAI tools and reviewing AI tools in operation.
- **Practical Assistance:** For example, procedure templates to ensure trustworthy usage of GAI.

## Next Steps

**This whitepaper underscores the importance of a risk-based approach to GAI policies to navigate the intricate terrain of modern urban governance effectively.** The call to action encourages local governments to leverage the insights and recommendations within this whitepaper, and by extension, our expert consultancy services, to cultivate a transparent, innovative, and responsible urban governance ecosystem powered by GAI. Through a collaborative effort, it posits that local governments can work with Generative AI tools, ushering in a new era of urban innovation and enhanced public service

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delivery, all while fostering a culture of trust, transparency, and accuracy in AI-powered governance.

The paper delves into the opportunities Generative AI presents for enhancing urban governance in both the EU and US, with a spotlight on the City of San Jose's GAI policy. By examining the City of San Jose's approach to GAI, there is a scaffold for other local governments keen on harnessing this technology responsibly.

The paper Leverages our extensive expertise in Responsible and Trustworthy AI to navigate the nuanced terrain of AI governance and risk management, ensuring your urban governance initiatives are both innovative and ethically grounded. With a rich legacy in understanding and managing AI's practical risks, we offer a comprehensive spectrum of experience in AI risk management and governance. Our unique value proposition is rooted in:

**Long-Standing Experience in Responsible AI.** Our consultants have years' experience in AI Governance and Risk Management.

**In-depth Understanding of AI:** We understand the technical aspects of AI and have guided many project implementations.

**Practical AI Risk Management:** With a pragmatic approach to AI risk assessment and mitigation, we navigate the complex risk landscape ensuring a balanced adoption of AI that accentuates benefits while minimizing adversities.

**Breadth of Experience in AI Risk Management and Governance:** Our wide-ranging experience transcends various facets of AI risk management and governance, empowering us to offer well-rounded, holistic services that seamlessly supports your organizational ethos and operational framework.

Together, we work towards cultivating a robust AI governance ecosystem that not only accelerates urban innovation but also embeds a culture of trust, transparency, and accuracy in AI-powered governance, marking a significant stride towards an era of responsible and enhanced public service delivery.

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