A GenAI Control Framework for a Dutch Government Body

Structured governance for responsible deployment

Nemko Digital

1. Situation

The Client saw a major opportunity **to use GenAI to raise the quality of work, increase efficiency, and create more impact**, while reducing a growing operational backlog and protecting service levels. GenAI was clearly needed to move forward, and several pilots were launched across the organization.

These pilots demonstrated real potential, but none of them made it into production. What was missing was not technical capability, but a clear path from experiment to deployment. **The organization lacked a structured way to assess risks, define controls, and make confident go-live decisions**, creating a clear need for support. The Client asked Nemko Digital to bring one priority GenAI use case into production while building a solid, reusable foundation for future GenAI initiatives.

2. Challenges

From the outset, the Client was **determined to deploy GenAI responsibly**, with non-negotiable standards for ethics, transparency, explainability, and accountability. However, these ambitions also created **friction**:

- No shared view of which GenAI risks were relevant, their severity, or which controls would be sufficient

- Legal and regulatory obligations not translated into clear operational requirements

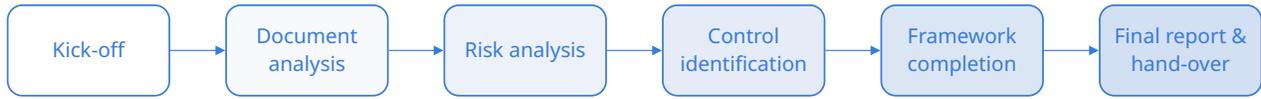- Fragmented ownership and unclear responsibilities across teams

- Long internal debates focused on interpretation rather than decisions

- Uncertainty around acceptable risk levels stalled go-live decisions

3. Our approach & solution

| Kick-off | → | Document analysis | → | Risk analysis | → | Control identification | → | Framework completion | → | Final report & hand-over |

Nemko Digital addressed this by designing a **use-case-specific GenAI governance and control framework** that was both practical and scalable. We started with a detailed analysis of the use case and its context, followed by a structured GenAI risk assessment. Building on a comprehensive AI Risk Atlas, we identified, assessed, and prioritized risks based on their likelihood and impact, and determined the remaining net risk.

Risk Assessment – Net, use case–specific risk assessments

Legend:
- Privacy
- Robustness
- Fairness
- Intellectual Property
- Accuracy
- Alignment with Values
- Legal Compliance
- Societal Impact
- Misuse
- Governance
- Explainability

Illustrative figure for contextual purposes only.

For each risk, we defined and mapped appropriate controls, and assessed existing controls to identify gaps. Working closely with internal experts, we created a concrete and transparent overview of more than 40 GenAI risks with remaining net risk for this specific use case, supported by a broader control landscape of over 150 possible controls. Roughly one third of the identified risks were classified as significant, requiring action before production. For these risks, 39 concrete control updates and new controls were defined, ranging from small procedural improvements to more substantial changes.

40+
Use case-specific GenAI risks with remaining net risk

150+
Controls

1/3
Of risks identified as significant

39
New controls and updates defined
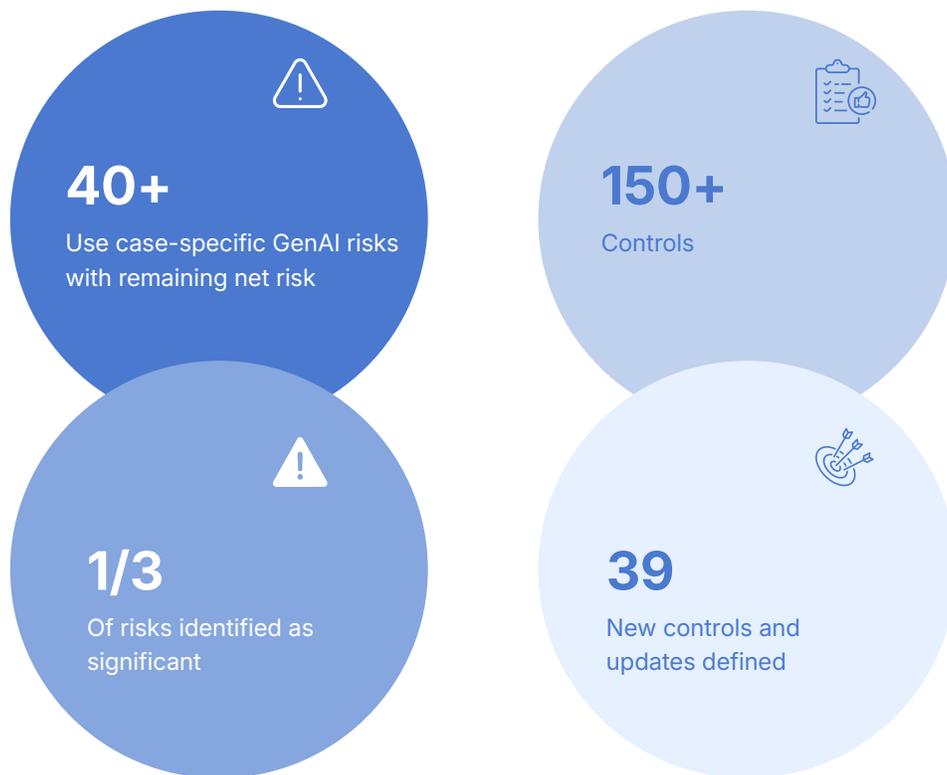
As an additional deliverable, the IBM Risk Atlas was adapted and embedded into an **organization-specific GenAI Risk Atlas**, creating a reusable asset for future GenAI initiatives.

Risk Repository

IBM Risk Atlas as base.
• What are the
case-relevant risks?

Controls Management

• What is the organization's
AI maturity?
• How can it contribute to
mitigating prioritized risks?
• What controls should the
organization implement?
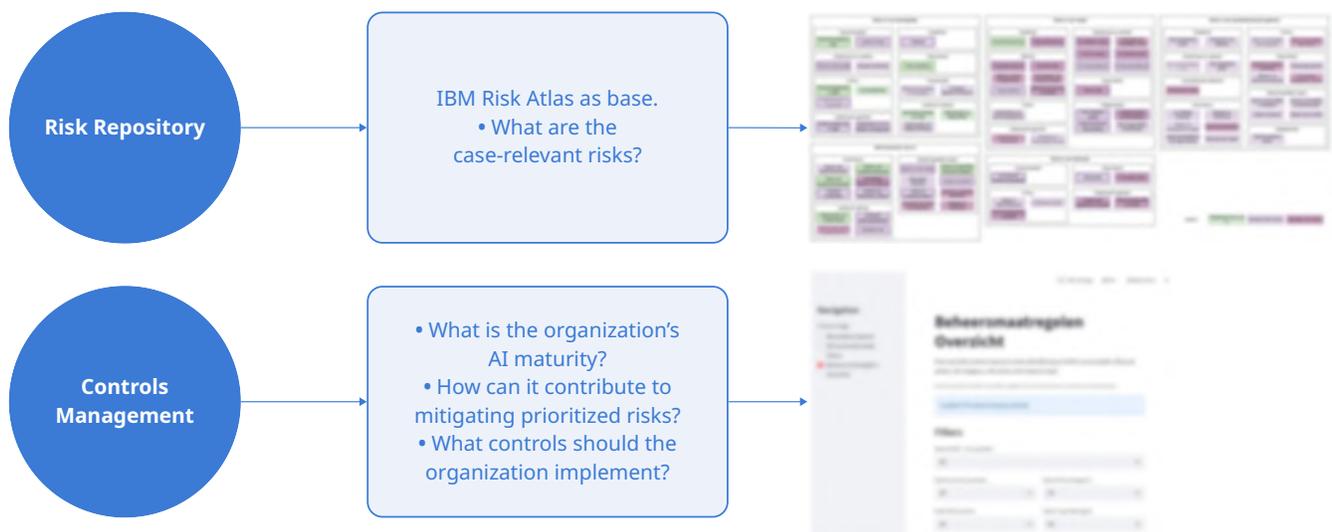
4. Value delivered

The new framework created a clear path for the GenAI use case moving into production in a **safe, controlled, and responsible way**.

More importantly, the organization now has a clear and repeatable approach for assessing and operationalizing GenAI use cases. Risks are transparent, responsibilities are clearly defined, and control requirements are concrete and actionable. **Internal discussions shifted from abstract concerns to joint execution, enabling teams to work together to bring GenAI into practice.**

The framework now serves as a **foundation to scale GenAI across the organization**, supporting a growing portfolio of use cases while maintaining trust, quality, and regulatory readiness.