
A COMPARATIVE STUDY BETWEEN THE LEGAL
FRAMEWORK OF CHATGPT IN MALAYSIA AND
UNITED KINGDOM

BY

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LIST OF ABBREVIATION

AI	Artificial Intelligence
AI Rmap	AI Roadmap
CDEI	Centre for Data Ethics and Innovation
DCMS	Digital, Culture, Media, and Sports
DSIT	Department for Science, Innovation and Technology
FCA	Financial Conduct Authority
ICO	Information Commissioner;s Office
IT	Information Technology
LLM	Large Language Model
MOSTI	Ministry of Science, Technology, and Innovation
OAI	Office for AI
PDPA	Personal Data Protection Act
Ofcom	The Office of Communications
UK	United Kingdom
4IR	4th Industrial Revolution

PREFACE

Technology has significantly impacted the whole world, altering traditional ways. Artificial intelligence (AI) tools are now a valuable resource in a variety of fields of research, include education and economy, among other technological uses. This research study investigates the elements of legal framework of ChatGPT in Malaysia and UK, examining the methods to protect users of ChatGPT.

A legal framework is the structure of regulations, laws, norms, principles, and institutions that control a specific sector or component of society. It establishes the framework for how laws are enacted, understood, and implemented in a certain jurisdiction or context. Nevertheless, creating a framework for a brand-new entity is very difficult, encompassing obstacles such as geographical and implementation difficulties, in this context, ChatGPT is helpful in many sectors such as education, farming, industrial activities and more. This study investigates the intersection between the legal framework of ChatGPT in Malaysia and UK.

This research examines the similarities and differences between the legal framework of ChatGPT in Malaysia and UK. With the help of the research, a better understanding and comprehension of how Malaysia can learn from UK based on its legal framework involving ChatGPT.

ABSTRACT

The purpose of this study is to investigate the legal framework of ChatGPT in Malaysia based on UK's legal framework involving ChatGPT. The lecturers who are teaching in universities will be our target demographic. Qualitative and exploratory research are used in this research. Using the interviewing approach, we have administered the questionnaire to 2 target individuals. Their opinions will be recorded and compared to the information found in research. The study's findings imply that Malaysia can learn from UK regarding the legal framework involving ChatGPT, especially the AI White Paper to create a better, proper, and complete legal framework regarding ChatGPT.

CHAPTER 1: RESEARCH OVERVIEW

1.1 Research Background

1.1.1 Artificial intelligence (AI) and ChatGPT

According to Du-Harpur et al. (2020), Artificial intelligence (AI) is difficult to define precisely. According to Du-Harpur et al. (2020), Alan Turing devised the popular Turing test in his journal 'Computing machinery and intelligence,' mentioned that a computer is considered as intelligent if it is unrecognizable from an actual person in dialogue by a person with no bias. In current vernacular, general intelligence, or AI, means that a device's capacity to interact, think, as well as operate independently regardless of recognized and unforeseen situations in a way equivalent to that of a person. This is far above the reach of existing approaches and is not exactly meant while the word 'AI' is used informally. Most references to AI are now synonymous with 'machine learning' or 'deep learning,' the latter being a subset of machine learning. However, according to Haleem et al. (2022), in November 2022, ChatGPT, an OpenAI model was launched, has excited scientists' interest, online users, entrepreneurs, writers, and pupils. Although numerous people's doubt about it, machine learning contains good possibilities. Given its widespread use, machine learning has had an impact on a variety of industries, allowing activities such as excellent quality climate forecasting and medical imaging analysis. ChatGPT can change how different industries work. This chatbot can chat in a human-like way. OpenAI allows users begin with ChatGPT by signing up a free account. This system might benefit from data provided by the system's users to improve its learning algorithms. Moreover, ChatGPT's revolutionary developments in access to data may help tag-holding businesses like as schools, universities, writing, mass media, Information Technology (IT), the retail sector, and many others. Using creative AI technology, multiple persuasive text may be created fast, and the content is able to be altered according to input to make it more appropriate for the goal.

1.1.2 AI Regulation in Different Areas

According to Clarke (2019), South Korea is credited for passing the country's initial state robotics regulations, the Intelligent Robots Development and Distribution Promotion Act of 2008. In terms of robotics governance, it is nearly purely helpful and stimulating, and scarcely even idealistic. A 'Charter' is mentioned, "which includes the regulations specified by Presidential Decrees, such as morality, to which the creators, suppliers, and consumers of intelligent machines must adhere" - yet not a single Charter seems to exist. Furthermore, A few of governments have passed legislation governing self-driving cars. For instance, the United States at federal level, California, Netherlands, United Kingdom (UK) and 3 states in Australia. Such programs have often placed a significant emphasis on financial considerations, the encouragement and assistance of creativity, exclusions from certain current laws, and little new rules or even advice. According to Clarke (2019), one way to control is to take use of natural mechanisms. For example, according to Schellekens (2015), it contended that requiring mandatory insurance was a suitable way of restricting responsibility for damage caused by autonomous vehicles. Legislators and authorities are moving slowly in the skies when it comes to drone legislation.

1.1.3 AI Legal Frameworks in Malaysia and United Kingdom

According to Maavak et al. (2023), Malaysia is yet to enact a law to govern AI. However, after acknowledging the significance of AI for economic expansion and long-term sustainability, in August 2022, the Ministry of Science, Technology, and Innovation (MOSTI) of Malaysian government has created and published the Malaysia National AI Roadmap 2021-2025 (AI-Rmap). The AI-Rmap additionally falls in line with essential national policies like the 12th Malaysia Plan (2021-2025) as well as the Shared

Prosperity Vision 2030, that highlight the significance of high-tech developments, especially digital transformation, and government execution of services, in the creation of nation by improving security in general, well-being in society, and inclusiveness. The AI-Rmap suggested six strategic goals, which includes establishing AI regulations, and 22 plans for action aimed at "making Malaysia a country in which AI enhances occupations, motivates national competitiveness, promotes creativity and entrepreneurial spirit resulting in economic growth and benefits society, and enhances the public's well-being."

According to Roberts et al. (2023), the governing body of the UK released their AI Regulation, the White Paper, an "appropriate and pro-innovation legal structure" for AI meant to foster creativity, recognize as well as solving potential threats, and position the UK as a "AI superpower." After quitting the European Union, the UK government has identified development via new technologies, such as AI, as a top objective for the entire nation. AI and large-scale data were chosen as 1 of 4 "Grand Challenges" in which the UK may "lead the globe" in coming years, and approximately £1 billion was invested in AI study, creation, and implementation in the UK. At the same time, attempts were undertaken to build adequate AI governance systems. Numerous government entities, such as the Centre for Data Ethics and Innovation (CDEI), the Office for AI, as well as the NHS AI Lab, have been formed to support successful and moral governance. Besides, many entities that are not included in the government, such as the Ada Lovelace Institute as well as the House of Lords Select Committee on AI, have developed to offer guidance and scrutinize the usage and management of AI.

1.2 Research Problem

1.2.1 Legal Ambiguities or Loopholes

In Malaysia, there are many legal loopholes as the country has not established any legal framework regarding AI entities such as ChatGPT, such as the lack of Specific AI laws, stealing of intellectual property right, and data protection and privacy. According to Ruschemeier (2023), without a proper legal framework for ChatGPT, it may cause confusion about their legal standing. Without specific requirements, it could remain uncertain how these AI entities are legally classified—whether as instruments, amenities, autonomous machines, or anything else unique. This ambiguity can have an influence on the rights they have, duties, and legal treatment. Moreover, there will be invasions of intellectual property rights as AI-generated content has a big possibility that it will not include its source of information. This might have an influence on the rightful owner of ChatGPT material, perhaps resulting in copyright or patent conflicts. Additionally, according to Guan (2023), ChatGPT information concerns intellectual property problems such as copyright. Due to the absence of laws on the production of intellectual property and the person who created it, it additionally becomes challenging to properly preserve the ownership of intellectual property rights for such inventions. At this point, the creator of AI is the subject of rights, and the development of lawful users ought to be controlled to avoid misuse of AI. Hence, it is very crucial for Malaysia to set up explicit legal frameworks for AI entities such as ChatGPT to enhance security of data and privacy.

In the United Kingdom, despite the fact that the government has outlined an extensive strategy to governing AI technology, which is a white paper that will be brought up in the Parliament, and it emphasizes the 5 principles that companies are asked to follow, which are openness and clearness; justice; accountability and governance; and contestability and redressability, but there are no proper legal framework yet, which is similar to Malaysia. The government is urging authorities to enforce current rules and enlighten businesses of their responsibilities under the white paper.” According to Ajevski et al. (2023), there are intellectual property rights issue in the UK. This is because that AI is unable to meeting the conditions for being recognized as a copyright owner in the United Kingdom. A legal individual must produce a copyright work for them to be considered its creator. As a result, a legal individual cannot be an AI. By virtue of section 9(3) of the Copyright, Designs, and Patents Act 1988, the copyright for inventions created by AI will reside in the individual who made the processes which contributed to the creativity. Moreover, Although the United Kingdom has data protection rules in place, such as the General Data

Protection Regulation, implementing these regulations to content produced by AI or interactions may provide challenges to avoid grey areas. Information on how AI systems manage user data, maintain confidentiality, and get permission in AI-mediated conversations may be required to be monitored. Furthermore, the legal structure of the United Kingdom may confront difficulties in harmonizing with global guidelines and partnerships on AI legislation in the case that many countries have not produced proper legal framework for AI because of the complexity and challenges. Insufficient alignment with global guidelines may have a consequence on compatibility and the UK's standing in the worldwide AI environment.

1.2.2 Enforcement Difficulties

As Malaysia do not have any proper legal framework for ChatGPT, according to Sun et al. (2023), Malaysia faces a huge challenge, which is cross-border operations while implementing laws on companies that operate across borders can be difficult, particularly when legal systems in various nations vary or clash. This is because that ChatGPT and other related AI systems work internationally and across borders. The growth of AI in smartphone applications has resulted in enormous data flow between all nations. Data from foreign users is sent to HQ computer facilities, which is in San Francisco, and employed in more powerful AI algorithms. As a result, there has been a boom of contradictory laws controlling cross-border data transfers. At one end of the spectrum, the United States advocates for global accords that promote data flow freedom. There are currently 72 similar agreements worldwide. At the opposite end of the spectrum, China virtually prohibits any data exports and is quickly exporting its state-based regulation system throughout the world. In the interim, the EU permits transmissions of data if user rights, such as confidentiality, are respected.

For the United Kingdom, according to Roberts (2023), due to geopolitical problems as it has exited the European Union, the efficacy of the UK's local oversight of AI measures, which have a chance to be stricter compared to those now put forward by the EU and US,

is going to be affected by their response outside. The United Kingdom, for example, is an international leader in AI assurance, with government agencies and regulators investigating ways to create a successful external guaranteed business. However, it is unclear if the market in the United Kingdom itself would be adequate for building such an external market, as bigger markets must be brought into the idea for it to be worthwhile for businesses to make investments in. It is unknown if the EU or the US will take the same position as to the UK.

1.2.3 Ethics and Socio-legal issues Implications

For both Malaysia and United Kingdom, according to Kamila et al. (2023), the rapid development of AI has resulted in a slew of ethical issues, particularly because of the ambiguous boundaries of moral judgment in AI-driven technologies. The transition from human-guided to AI-guided systems marks an alteration in social structures, with AI technologies bringing enormous opportunities that human beings cannot afford to disregard. AI advancements have ended up resulting in new findings and, human-machine partnerships. Because AI systems individually could fail to adhere to recognized ethical rules, such cooperation usually pose additional ethical concerns. According to Saini (2023), for instance, using ChatGPT for tasks such as AI-generated content production, authoring, design, and more could additionally infringe copyright restrictions. The chatbot produces outcomes that are close or even exactly to the original text. It violates intellectual property and copyright rules if the legitimate source is not acknowledged. As a result, using ChatGPT for such purposes is immoral. In emerging civilizations, AI technologies are coming to be considered as independent moral representatives, possibly resulting in contradictions between organic ethics and autonomous ethical authorities. As AI machines acquire autonomy, their ethical choices improve. Even though AI systems may contain logical intervention, it is possible that this itself might not be sufficient in years to come for a completely independent ethical individual. It is challenging to define what is a suitable position for technologically driven entities as moral agents for subsequent civilizations.

1.3 Research Questions

RQ 1: What is ChatGPT?

RQ 2: What are the laws governing ChatGPT in Malaysia?

RQ 3: What are the laws governing ChatGPT in the United Kingdom?

RQ 4: What is your suggestion to improve ChatGPT law in Malaysia?

1.4 Research Objectives

RO 1: To define ChatGPT.

RO 2: To analyse the law governing ChatGPT in Malaysia.

RO 3: To analyse the law governing ChatGPT in the United Kingdom.

RO 4: To suggest improvements in Malaysian laws in ChatGPT.

1.5 Research Significance

The significance of this research study is that it will provide understandings of different strategies, especially the ways of UK is using to govern AI entities, especially ChatGPT, and enabling a more comprehensive evaluation of worldwide AI governance developments as well as promoting global cooperation and standardization initiatives. Moreover, this comparative research is aimed to help determine optimal practices, indicate places for enhancement, and guide the creation of more successful, adaptable, and responsible AI policies. Furthermore, it adds to ethical AI expansion by resolving legal issues, increasing openness, and supporting ethical behaviours in AI technology implementation and usage.

CHAPTER 2: LITERATURE REVIEW

2.1 Definition of ChatGPT

According to Montti (2022), OpenAI has founded and expanded the Large Language Model (LLM) chatbot that is created based on GPT-3.5. It is capable of a huge capacity to interact in the way of a conversational dialogue and gives responses which are similar to people. Moreover, the duty of forecasting the following phrase in a progression word sequence, even articles and codes are performed by large language models. There is a training for ChatGPT which needs a lot of recourses, which is the Reinforcement Learning with Human Feedback is a further stage to train it which utilizes feedback from people to help ChatGPT learns to comply with instructions and give answers that satisfy individuals. According to Montti (2022), OpenAI, an AI startup that is in San Francisco, produced ChatGPT, and it was founded by the same founder of Tesla and SpaceX, Elon Musk. OpenAI LLC is a profit-fuelled company, which is the subsidiary of OpenAI Inc., the non-profit mother company. OpenAI is renowned for its DALLE, a deep-learning model that generates visuals from textual instructions known as cues. Microsoft has input \$1 billion as an affiliate as well as a shareholder in 2019 and invested another \$10 billion in 2023 to support their DALLE 2. They collaborated to create the Azure AI Platform. It turned out that raising the volume of information boosted the language models' capacity to accomplish more. However, LLMs have limitations because they don't always recognize what a person desires. Due to the requirement to train GPT-3.5, to let it learn, there are loads of information and code data from the world wide web as inputs to train it, emphasizing trainings on replying in conversations acting in a human manner.

2.2 Types of ChatGPT

2.2.1 GPT-1

According to Ray.P (2023), it was built using the Transformer design, a neural network developed for natural language processing applications including language modelling and automated translation. Moreover, applying a language modelling job, GPT-1 had been previously trained using comprised books, papers, and online sites. Considering each of the previous phrases in the series, the algorithm was taught to forecast the upcoming phrase in a series. GPT-1 can understand the trends and correlations connecting words in a huge collection of written content because of prior training method. GPT-1 might be adjusted on translating languages, sentiment evaluation, or classifying texts after prior training. Furthermore, GPT-1 has 117 million parameters. Although its tiny size, GPT-1 performed well on tasks related to natural language processing and shown the effectiveness of prior training using vast scales of written content to increase understanding of languages.

2.2.2 GPT-2

According to Ray (2023), having 1.5 billion parameters, it's an upgrade of GPT-1. Utilizing a language modelling job, GPT-2 also had prior trainings and training objectives like GPT-1, and beyond, as it's capable of creating more lengthy and more cohesive texts, and stronger capacity to gather up new objectives and contexts. GPT-2 may be adjusted on text categorization, sentiment evaluation, and answers to questions. The algorithm managed to attain cutting-edge outcomes on several duties, and it's good at creating superior natural language writing. It can create accurate and cohesive writing which was challenging to discern from human-written material. This

raised worries about the algorithm's possible abuse, and generation of false information.

2.2.3 GPT-3

According to Ray (2023), it has 175 billion parameters, bigger than GPT-1 and GPT-2. The trainings, objectives and capabilities are similar as the older versions, but more. GPT-3 can do multi-task learning, to learn faster at the same time, and few-shot learning, that enables GPT-3 to learn new things from a small number of instances. It is extremely flexible and may utilized in an extensive variety of linguistic applications with significant of adaptability. Due to its strengths, it has been utilized in real-life situations as chatbots, language translator, content producer, and code development. It inspired people to put more effort in researching and developing natural language processing area, that led big interest and enthusiasm in the AI industry.

2.2.4 InstructGPT

According to Ray (2023), InstructGPT is better than GPT-3. It has reinforced dependability and it's the foundation for ChatGPT chatbot. Compared to GPT, InstructGPT uses input from people as part of the improving stage. Individuals repeat on smaller amounts of data by creating and contrasting the intended result with the GPT production, categorizing the GPT result according to input from humans, and displaying the results to the GPT algorithm to help steer it towards the intended result on narrowed assignments and queries. This procedure is currently recognized in OpenAI technology, enabling InstructGPT to enhance on GPT-3.

2.2.5 ProtGPT2

According to Ray (2023), ProtGPT2 is an advanced model with 738 million parameters based on the GPT-2 Transformer design with 36 layers with an overall dimension of 1280. ProtGPT2 had been previously trained in a self-monitored way utilising the UniRef50 database (version 2021_04) utilizing basic sequences of proteins lacking description. Utilizing a causal modelling aim, the algorithm was programmed to anticipate the following phrase in the series, enabling it to build an internal model of proteins and grasp the protein language. ProtGPT2 is a potential instrument for protein engineering and design in general.

2.2.6 BioGPT

According to Ray (2023), BioGPT was created exclusively for the generation and extraction of biomedical text. BioGPT is a domain- particular, prepared Transformer model built on the Transformer language model design. It was taught from beginning on 15 million PubMed descriptions, which makes it appropriate for analyzing biomedical textual information.

2.2.7 ChatGPT

According to Ray (2023), ChatGPT was taught utilizing a language simulation assignment on a huge collection of written content, including books, papers, and websites. ChatGPT learns the structure and links between words and phrases in

natural language through pre-training, allowing it to generate logical and genuine replies in a discussion.

2.2.8 GPT-4

According to Ray (2023), GPT-4 is a huge mixed language model capable of accepting picture and written input and producing written results. Although it could fail to be as effective in real-life situations as individuals, GPT-4 has displayed individual-like results on a list of specialized and educational levels. During a mock legal assessment, for example, it got an overall rating in the highest 10% of participants in exams, which is higher than GPT-3.5's result in the bottom 10%. GPT-4 was created after half a year of continuous alignment using courses via OpenAI's adversarial testing program and ChatGPT, leading to the algorithm's highest achievement on reality, manageability, and remaining inside the provided restrictions, nevertheless there's still potential for growth.

2.3 History of ChatGPT in Malaysia & United Kingdom

2.3.1 Malaysia

In Malaysia, AI is categorized as an important element and the government has plans for recently. According to the Academy of Sciences Malaysia (2021), the MOSTI, YB Khairy Jamaluddin has introduced the 10-10 MySTIE Framework in December 2020,

and according to Ariffin et al. (2023), there is the National Policy Framework on Science, Technology, and Innovation 2021-2030, and the Malaysia Digital Economy Blueprint (2021-2030). These frameworks aim to leverage Science, Technology, and Innovation to strengthen the country's economy, develop socioeconomic and reach Sustainable Development Goals. The National Fourth Industrial Revolution (4IR) Policy identified AI as a major contributor within the MySTIE framework and one of five core technologies. The 4IR policy, emphasizing on multiple interaction, machine learning, robotics, and real-time data, sees AI as one of the drivers to prosperity, particularly for farming, manufacturing, schooling, finance, and trades.

AI-led sectors are predicted to boost Malaysia's gross domestic product by 1.2%. Moreover, acknowledging the significance of AI for revenue generation and long-term sustainability, the Malaysian government created and published the country's National AI Roadmap 2021-2025 (AI-Rmap) in August 2022 via the Ministry of Science, Technology, and Innovation (MOSTI). AI-Rmap is additionally in line alongside essential national policies like the Shared Prosperity Vision 2030 and the 12th Malaysia Plan (2021-2025). There are 6 strategies in AI-Rmap, which are creating AI monitoring, enhancing AI research and development, improve technological environment to support AI, attract AI talent, integrate AI, and boost start a national AI development economy.

According to Rizduan (2023), the Malaysian government has input enormous amount of capital into AI technology these few years. For instance, it has invested RM100 million to assist digital economy and resources for AI in current years' budgets, \$54 million into an augmented reality (AR) and Artificial Intelligence (AI) fresh company, a \$1 billion, five-year effort to establish a university for AI and other new technologies was launched. Besides, the Malaysia Cybersecurity Strategy 2020-2024 was created, featuring a US\$434 million commitment to boost AI and cybersecurity activities. It was carried out to generate a surge of opportunities to fuel the nation's economic growth and provide new employment for Malaysians. As an outcome, AI is currently employed in a variety of industries, including medical care, shipping, and banking.

According to Bhati (2023), Malaysia has enabled the access of ChatGPT usage in colleges and universities, if it's used in accordance with the set guidelines. This is because that the Higher Education Minister of Malaysia knows that ChatGPT is becoming a trend and can't be prevented. He did emphasize the significance of defining when exactly it is appropriate to use. Lastly, according to Fam (2023), Malaysian IOS and Android users are now able to download ChatGPT in July for free (using GPT-3.5), and to use GPT-4, users can pay RM90.22 per month for it.

2.3.2 United Kingdom

According to the Authority House of Lords (2018), back in the 1960s where the term AI is created, the discipline expanded above a small group of pioneers, largely headquartered in the US and the UK, and the initial main higher education AI studies centres were created at the Massachusetts Institute of Technology, Carnegie Mellon University, Stanford, and Edinburgh University. A professor in London has warned the parliament that it is trying to make sure the citizens are embracing changes which are manipulated from the authorities. According to Omar (2017), the European Commission revealed in 2017 that some of the European Commission's participating nations have tried to restructure the AI industry by establishing national policies on the 4IR. In 2012, certain countries, including the UK. The current data safeguarding legislation in the UK comprises the UK Data Protection Act 1998 as well as the EU General Data Protection Regulation 2016. Both regulations are believed to provide widely recognized and successful safeguards for data for their people.

According to Omar (2017), having its Alvey Programme established in 1983, the UK government restores connection to AI. Although a total investment of £350 million in 4 years, it can't achieve its primary goal of boosting international competitiveness of UK information technology enterprises. In the 1990s, the UK government continued

distributed £5.75 million in approximately 6 years into a program called the Neural Computing Technology Program in 1993. However, it failed. The present surge in enthusiasm for AI was partly fuelled by neural network advancements in the early 21st century, as a group of researchers directed by Geoffrey Hinton, a British scholar, started to show the effectiveness of 'deep learning' neural networks as an AI tool. As for now, ChatGPT is available for UK people as like Malaysia. As in December 2023, the judges of England and Wales have decided to approve the usage of ChatGPT for only some of their specific tasks.

2.4 Laws Involved in ChatGPT in Malaysia

According to Daud (2022), before having a proper legal framework for AI, Malaysia's legal system adopts on the doctrine of negligence. It happens when an individual who has a responsibility of care produces behaviour that goes below the required standard, causing injury to a victim. If damage occurs because of the usage of AI, the initial problem to be answered is whether there's someone owes a responsibility of care to keep from creating or avoiding the harm. There's a controversial element about ChatGPT which is its safety about data and privacy. According to Shahwahid et al. (2015), in Malaysia, there's a regulation which is the Personal Data Protection Act 2010 ('PDPA'). With this regulation, Malaysia is the pioneer in ASEAN countries to launch regulations like this into the region. After everything's ready in 2013, the law is enforceable on the 15th of November 2013. The PDPA has been established mainly to govern the gathering and use of individual information gathered for business reasons, and everything related to or relevant to users' private information. The PDPA additionally seeks to protect customers' private information rights. Businesses and other entities which manage individuals' private information in business relationships (information consumers) are required by the Act to inform them and seek their consent before gathering and using their individual privacy. The PDPA applies to a data user, who is defined in section 4 of the Act "as a person who either alone or jointly or in common with other persons processes any personal data or has control over or authorizes the processing of any personal data but does not include a data processor". Later, it was added

that a data user can only be a legal person, and the legal person includes individuals, corporates, and unincorporated entities. This Act is useful for ChatGPT in Malaysia is because that if there's any leakage of personal data on the internet, and ChatGPT is fed with the data, this Act can be used to control the leakage of personal data from other internet websites to ChatGPT.

2.5 Laws Involved in ChatGPT in UK

According to Omar (2017), the UK is not equipped with a proper regulation for AI. However, the country is putting effort on ensuring the relevancy of any legislation accessible to be appropriate to AI. On the other hand, according to Roberts (2023), during 2021, the UK government released their National AI strategy, with a single decade objective for preservation for its standing as international AI giant and create the globe's most reliable and pro-innovation governance structure. In 2023, the AI White Paper was established. It emphasizes that the United Kingdom ought to keep towards the path indicated in 2018 by concentrating on context-dependent and, for the time being, non-statutory governing. The argument behind is the fact that it would prevent additional burdens from regulation that might stifle development while simultaneously offering enough flexibility to cope with emerging technological breakthroughs. This regulation emphasizes proportionality and non-regulatory approaches, and the substantial government commitment to utilizing technology to foster invention. However, since legislative inconsistencies, shortages, and duplication are recognized risks, the White Paper suggests 3 approaches to strengthen legislative harmonization. Initially it outlines the fundamental traits of AI to limit the definition of AI without becoming excessively directive, while still offering a thorough knowledge of technical advances. Then, the text outlines an ensemble of cross-sectoral standards that authorities overseeing AI under their authority should customize and apply. Lastly, it outlines a variety of centralized government powers to determine, evaluate, prioritize, and oversee AI concerns that cut across several domains which may necessitate government involvement. This White Paper will have the power to be implemented to the entire UK. Finally, extra regulations are going to be subject to consultation with local authorities.

2.6 Agencies Involved in ChatGPT in Malaysia

Since that ChatGPT is a very useful and helpful tool for Malaysian that are doing their higher educations, one of the agencies which are involved in ChatGPT is the Ministry of Higher Education Malaysia. According to Lee (2023) the minister of Higher Education has established a set of guidelines for the utilization of ChatGPT. Moreover, according to Ariffin et al. (2023), the Malaysia's Ministry of Science, Technology, and Innovation (MOSTI) is also an important agency to be involved in the AI industry, including ChatGPT. During 2022, MOSTI has established the Malaysia National AI Roadmap 2021-2025 (AI-Rmap). It's to cooperate with other crucial national policies. Furthermore, according to MDEC (2021), another agency that is involved in AI, which includes ChatGPT is the Malaysia Digital Economy Corporation. It serves under the Ministry of Communications and Digital, which has the duty to lead the entire country for digital transformation of economy, which includes AI technology. For instance, in 2021, they have established DataKITA.Hub, a tool developed to help organizations start and improve their data experiences. The website serves as a one-stop shop for everything related to AI and data, now includes a complete map of local data and AI ecosystem actors. Additionally, another agency is the Malaysian Communications and Multimedia Commission that is involved in AI, which includes ChatGPT. According to MCMC (2023), their duty is to regulate industry guidelines based on regulations and execute and develop the government's national policy goals for the communications and multimedia industry. For instance, they are doing research regarding managing privacy in AI enabled globe.

2.7 Agencies Involved in ChatGPT in UK

The first agency that is involved in AI, including ChatGPT in UK is the Department for Digital, Culture, Media, and Sports (DCMS). According to DCMS (2021), the duty of DCMS is AI policy and boost adoption throughout the economy. Moreover, according to Evans et al. (2022), the DCMS hired Capital Economics to conduct a study and examine the existing and potential usage of AI by UK businesses. The second agency is the Office for AI (OAI), which is part of the Department for Science, Innovation and Technology, a joint DCMS as well as the Department for Business, Energy, and Industrial Strategy. According to the OAI (2023), the responsibilities of OAI are to guarantee that the UK obtains national and worldwide AI monitoring proper in order to foster creativity and funding while also protecting people and their core principles, making investments into and strategizing for the future requirements of the AI ecosystem in order to maintain their position as a research and AI giant, and helping the shift to an AI-enabled economy, capitalizing on the advantages of creativity in the UK, and making sure AI, including ChatGPT helps all industries and areas. For instance, it helped the Department for Health and Social Care to putting efforts in AI advancements in healthcare. Besides, according to the ICO (2023), the Information Commissioner's Office (ICO) is also involved in ChatGPT in UK. The ICO prioritizes AI because technology has an opportunity to become serious threats to persons and their rights and freedoms. For instance, they are experts in the fairness in AI, dark patterns, AI-as-a-service, biometric data, and biometric technologies, and more.

CHAPTER 3: METHODOLOGY

3.1 Research Design

According to Vaus.D (2006), The research design is a complete strategy and framework for analysis that is thoughtfully chosen to smoothly combine the many aspects of the study, guaranteeing an in-depth understanding of the research topic. It serves as a template for the gathering, measurements, and analysis of information and data, ensuring a consistent and logical strategy for the research project.

3.1.1 Qualitative Research

According to Flick (2004), qualitative research indicates to describe lifeworld's 'from the inside out', via the perspective of those who take part. By doing so, it hopes to lead to an improved comprehension of the social environment by highlighting procedures, meaning patterns, and structural characteristics. Qualitative research, that provides detailed and 'rich' explanations, does not merely describe reality, nor does it engage in exoticism for its very own purpose. It instead uses the unique, abnormal, and unanticipated as an origin of understanding and a mirror whose reflection makes the unknown visible in the unknown, bringing up new possibilities for identification. According to Sofaer (1999), the reason that qualitative research is chosen to be utilized is because that qualitative research aims to reduce uncertainty regarding key occurrences or questions. Developing understanding entails gradually reducing uncertainty.

3.1.2 Exploratory Research

According to Swaraj (2019), exploratory research aims to discover unknown areas or test the feasibility of a certain subject. Exploratory research aims to better define issues, explain concepts, collect answers, acquire understanding, eliminate unworkable ideas, and generate hypotheses. According to Swedberg et al. (2020), the exploratory research is utilized because it may basically serve two goals. The first goal is to broaden one's understanding of a topic that is not well-known but should be. The second goal is to produce new and fascinating hypotheses about a well-known issue.

3.2 Data Collection Method

According to Paradis et al. (2016), data collecting techniques are significant as the methodology and analytical approach utilized by researchers define how the information obtained will be utilized and what interpretations may be generated. Moreover, there are five ways to collect data, such as surveys, interviews, focus groups, observations, and textual or content analysis. The technique that will be used in this research will be interviews. This is because that interviews are useful for documenting participants' perspectives, impressions, or anecdotes regarding their views and reactions to certain circumstances or occurrences. Interviews are utilized to collect information from people one-on-one, utilizing a set of preset questions or topics of interest.

3.2.1 Primary Data

According to Rabiński (2003), Primary data is information that researchers obtain firsthand from the source using methods such as surveys, experiments, interviews, observations, or questionnaires. The information was acquired solely for the research topic in question and was never acquired or shared by anyone. Primary data is significant since it is customized to the study's particular aims and provides straightforward responses to the study's concerns. It provides researchers with ownership of the information gathering process, covering the selection of research tools, sampling methods, and data collection protocols.

3.2.2 Secondary Data

According to Rabiński (2003), secondary data is indirectly produced by the researcher; it can involve public or unpublished articles derived from study that depends on original sources or any content apart from primary sources utilized to construct a written work. Moreover, according to Barnes et al. (2021), secondary data sources include surveys, government documents, official information, academic research, and archive data archives. In this research, online journal articles help a lot in data collection.

3.3 Sampling Design

In sampling design, target population, sampling framework, sampling elements, sampling techniques and sampling size will be discussed.

3.3.1 Target Population

According to Barnsbee et al. (2018), the target population is the group of people that the study aims at carrying out investigation on and derive findings from. In this research, Ms Lee Sim Kuen and Dr Rajini Kumar a/l Sreedharam from the Faculty of Accountancy and Management in Universiti Tunku Abdul Rahman are chosen to be included in the target population of this research.

3.3.2 Sampling Frame and Sampling Location

According to Yadava et al. (2018), the sampling frame is described as the technique through which a person is determined or recognized as a part of the group that is to be sampled, in addition to the time basis for measuring the length of the factor.

Moreover, the sample location refers to the precise place where researchers collect response or data for evaluation. The sampling location of this research will be Universiti Tunku Abdul Rahman Sg Long.

3.3.3 Sampling Elements

According to Csun (2024), a sample element refers to the unit of study or example in the group that is being evaluated. There are two target individuals to be participated in this research, which is Ms Lee Sim Kuen and Dr. Rajini Kumar a/l Sreedharam. One of the candidates chosen to be participated in this research is Ms Lee Sim Kuen because she is a the Specialist 1 and a law lecturer in UTAR and has a qualification of Bachelor of Arts from the City of London Polytechnic, and she had won a Certificate of Honor for succeeding from being the champion in the second “Belt and Road”

University Youth Forum which was held in China University of Political Science and Law, Beijing in 2018. Dr. Rajini Kumar a/l Sreedharam is chosen for participating this research because that he has the qualification of Doctor of Philosophy (Law), Universiti Kebangsaan Malaysia Master of Science (Corporate Communication), Universiti Putra Malaysia Bachelor of Laws, Anglia Polytechnic University, and he is an expert in constitutional law, cyber law, human rights, and media law. Both are experts in law.

3.3.4 Sampling Techniques

In addition, according to Elfil et al. (2017), there are two primary types of sampling methods. The probability sampling method indicates that every one of the participants in the population being sampled have equal opportunities to be chosen in the population to be studied, whereas the non-probability sampling method indicates that the population being sampled is chosen in an unorganized procedure, which cannot ensure equivalent opportunities for every participant in the target population. The sampling technique that will be utilized in this research is the purposive sampling technique under non-probability sampling method. According to Rai et al. (2015), purposive sampling is a method of non-probability sampling where researchers select participants using requirements such as expertise in the research topic or readiness to contribute.

3.3.5 Sample Size

According to Kaur (2021), sample size refers to the quantity of participants to be sampled in the research. The sample size used in this research is small because of the specialized nature of the population. Although the sample size may restrict the ability

to generalize of the outcomes, it enabled for thorough examination and analysis of crucial factors among the focus group.

3.4 Sample Research

In this research, an interview is conducted to understand how well the professionals know and their point of view of ChatGPT framework. Instead of surveying every individual, professional sample representatives are chosen. By interpreting the data collected from the samples, the view regarding ChatGPT and the limitations of ChatGPT framework will be discussed.

3.4.1 Face to Face Interview

According to Jennings (2005), face-to-face interviews are structured interviews done by professional interviewers using a predetermined interview process and an assortment of questions to capture the answers provided by the participants. Face-to-face interviews provide multiple benefits, including the capacity to regulate communications, guarantee that the targeted participant is the respondent, ask complicated questions, and employ probing methods.

3.4.2 Semi Structured Interview

According to DeJonckheere et al. (2019), semi structured interviews feature a brief set of 'guiding' questions, which are complemented with follow-up and probing questions based on the interviewee's replies. Moreover, according to Galletta (2013), semi structured interviews can be divided into phases, progressing from completely open-ended topics to additional theoretically oriented questions as the interview develops. A significant advantage of the semi structured interview is its emphasis on real-world experiences while continuing to address theoretically driven factors of relevance.

3.5 Data Processing

Step 1: Transcribing and Checking

According to Leandro. et al (2019), transcription is to translate ideas and depictions of society from audible into written words. When the information has been transcribed, it is critical to ensure its correctness and validity. This entails comparing the transcribed content with the source audio to make sure all the verbal phrases are correctly transcribed without deletion or deformation. Checking also entails validating any confusing or ambiguous areas with the initial sources of information to ensure data quality.

Step 2: Filtering Initial Data/Coding

According to Austin (2015), Filtering original info is the act of examining transcribed material while removing unrelated or unnecessary data. This might entail eliminating any parts of material that do not relate to the study goals or topics being investigated. Moreover, coding is the process by which the investigator identifies and interprets subjects, problems parallels, and contrasts indicated by respondents' experiences. This technique allows the researcher to gain a better understanding of the globe through the eyes of each respondent.

Step 3: Identifying Themes, Patterns, and Relationship

According to Austin (2015), identify themes, patterns and relationship is the process of combining codes from a few narratives to display the results of qualitative research in a logical and relevant pattern, and relationship. The benefit of following this procedure is the fact that at the end, the researcher will be able to provide the information gathered from the conversations by utilizing quotes from the person's transcripts to demonstrate the origins of the researchers' opinions. Moreover, according to Dawadi (2020), this step's primary emphasis is upon the examination of themes at a higher level beyond codes. Thus, when the results are prepared for presentation, each topic might serve as the title for a portion of the article or presentation.

Step 4: Theme Review and Theme Naming

According to Dawadi (2020), in theme review, each of the topics have been purposefully combined because the original grouping of the themes was meant to be refined and presented in a more organized manner. Themes should be evaluated for inner homogeneity (coherence

and consistency) and exterior heterogeneity (distinctions between themes). Moreover, in theme naming, the themes were developed more by looking over all of the primary themes, subtopics, codes, and samples. Each topic was granted a final name and description to provide context for the data.

Step 5: Generating a Report

According to Dawadi (2020), the last stage of data processing is to create a report on the results. A thematic analysis report must persuade people of its reliability and usefulness. The way of presenting of the study typically comes in the type of a written report, which should adhere to approved scholarly criteria. In particular, the paper ought to start with an introduction that includes an overview of the research literature. The part that focuses on the methodology chosen should provide a summary of why qualitative methodology was the best fit for the researched issue as well as why one technique was picked to lead the research. The procedure ought to be outlined, comprising ethical approval, participants selection, manner of selection, and data collection technique, before moving on to the study findings, which will serve as the main content of the report or article. All that is required to conclude the report is a conclusion, the constraints of the study, and effects on application.

3.6 Data Analysis

These questions will be required to be answered during data collection:

Theme 1: What is the definition of ChatGPT?

According to Ms Lee and Dr Rajini, they said that ChatGPT is an AI chatbot that uses natural language processing to create humanlike conversational dialogue.

Theme 2: What is the History of ChatGPT in Malaysia and UK?

According to Ms Lee and Dr Rajini, ChatGPT is based on GPT created by OpenAI in 2018, and it's designed to predict the next word or phrase in each sequence of words.

Theme 3: What are the Legislations involving ChatGPT in Malaysia?

According to Ms Lee, she said that the Copyright Act 1987 in Malaysia is for human authors. Hence, it's unlikely that copyright would be applicable to the work that's generated by chatbots.

According to Dr Rajini, he said that there is no laws or structures to oversee AI usage in Malaysia. However, Malaysia is exploring policy options. MOSTI is responsible for developing AI governance. As part of this effort, MOSTI has introduced the National Artificial Intelligence Roadmap 2021-2025. MOSTI has also mentioned plans to introduce a comprehensive AI Bill.

Theme 4: What are the Legislations involving ChatGPT in UK?

According to Ms Lee and Dr Rajini, they said that the legislations involved in UK for ChatGPT are that the UK Government has adopted a cross-sector and outcome-based framework for regulating AI, underpinned by five core principles: safety, security, and robustness; appropriate transparency and explainability; fairness; accountability and governance; and contestability and redress. These principles guide policymaking to ensure ethical and responsible development and deployment of AI technologies across various sectors in the UK.

Theme 5: What are the Agencies involved in ChatGPT in Malaysia?

According to Ms Lee and Dr Rajini, they said the agencies involved in ChatGPT in Malaysia is MOSTI.

Theme 6: What are the Agencies involved in ChatGPT in UK?

According to Ms Lee and Dr Rajini, they said that the agencies involved in ChatGPT are governmental bodies, such as the Office for Artificial Intelligence (OAI), the Information Commissioner's Office (ICO), and the Centre for Data Ethics and Innovation (CDEI), the Department for Science, Innovation and Technology (DSIT), The Financial Conduct Authority (FCA), and The Office of Communications (Ofcom) play roles in regulating and monitoring AI applications. These organizations collaborate to promote ethical and accountable AI development and implementation across the UK.

Theme 7: What are the Laws involved in ChatGPT in Malaysia?

According to Ms Lee, she said that there are no laws for ChatGPT or similar AI technologies.

According to Dr Rajini, he said that there are no laws explicitly targeting ChatGPT or similar AI technologies. Nevertheless, broader legislation concerning data protection, cybersecurity,

intellectual property, and privacy might be applicable to the utilization and implementation of AI technologies.

Theme 8: What are the Laws involved in ChatGPT in UK?

According to Ms Lee and Dr Rajini, they said that there weren't specific laws in the UK directly addressing ChatGPT or similar AI technologies. However, various laws and regulations may apply depending on the context of its use. These could include data protection laws such as the General Data Protection Regulation, intellectual property laws, consumer protection laws, and regulations related to algorithmic transparency and accountability.

Theme 9: What are the recommendations to improve ChatGPT framework in Malaysia based on UK's framework?

According to Ms Lee, she said that ChatGPT has revolutionised our education system to a new phase as it's used by most educators and learners, it was proved great at enhancing speaking skills of "English as a second language" learners. Hence, it will be excellent to continue the use of it while a legal framework or guidelines must be released as soon as possible to oversee the use of it.

According to Dr Rajini, he said that it's premature to offer recommendations at this stage as the laws regarding this matter are still under discussion.

3.7 Conclusion

In this research qualitative research is utilized because of a few advantages, and inside qualitative research, exploratory research is used to discover the unknown areas or test the feasibility of a certain subject. The data collection method used in this research is interview. Moreover, primary, and secondary data are used in this research. Furthermore, target

population, sampling frame, sampling elements, sampling techniques, sampling size are discussed in sampling design. Face to face interview and semi structured interview are used in this research. Besides, data processing in this research includes 5 steps, which are transcribing and checking, filtering initial data/coding, identifying themes, patterns, and relationship, theme review and theme naming, and generating a report. Finally, the questions in the interview are as listed in Data Analysis.

CHAPTER 4: QUALITATIVE DATA ANALYSIS

4.0 Introduction

In this chapter, the results and analysis of the results which are relevant to the research questions will be presented, such as the biography data of interviewees and the findings of the research. It is to help researchers to understand the meaning beneath the efforts and etiquette of the respondents.

4.1 Biography Data

According to Xu et al. (2023), biography data is an indicator of human tendencies toward future conduct determined by previous life experiences. The two target individuals in this research, which is Ms Lee Sim Kuen and Dr. Rajini Kumar a/l Sreedharam. Ms Lee Sim Kuen is chosen because she has the qualifications of Specialist, Advocate & Solicitor (Retired), CLP (Malaya), Bachelor of Arts in Combined Studies (Modular Law), London Metropolitan University, United Kingdom. Moreover, Miss Lee Sim Kuen was formerly a Managing Partner of a law firm, Messrs. Iqbal Hakim Sia & Voo, Kuala Lumpur. An Advocate & Solicitor (now retired), Certificate in Legal Practice, University Malaya, Bachelor of Arts in Combined Studies (major in Law), The London Metropolitan University, London, United Kingdom. Over 23 years of law practice and commercial/corporate industry experience. Furthermore, Dr. Rajini Kumar a/l Sreedharam is chosen for participating this research because that he also specializes in law and has the qualification of Doctor of Philosophy (Law), Universiti Kebangsaan Malaysia Master of Science (Corporate Communication), Universiti Putra Malaysia Bachelor of Laws, Anglia Polytechnic

University, and he is an expert in constitutional law, cyber law, human rights, and media law. The reason that they are perfect for this research is that both are experts in law.

4.2 Findings

For the definition of ChatGPT, both respondents said that ChatGPT is an AI chatbot that uses natural language processing to create humanlike conversational dialogue. In terms of the history of ChatGPT in Malaysia and UK, it's based on GPT created by OpenAI in 2018, and it's designed to predict the next word or phrase in each sequence of words. It was created because that OpenAI wanted to create a chatbot that can hold natural conversations with humans, then ChatGPT was released in early 2020.

For the legislation involving ChatGPT in Malaysia, Ms Lee Sim Kuen said that the Copyright Act 1987 in Malaysia is for human authors. Hence, it's unlikely that copyright would be applicable to the work that's generated by chatbots. Thus, there are still lack of specific legislations for chatbots like ChatGPT if it breaches copyright laws in Malaysia. Additionally, Dr. Rajini Kumar a/l Sreedharam mentioned that there is no laws or structures to oversee AI usage in Malaysia. However, Malaysia is exploring policy options. MOSTI is responsible for developing AI governance. As part of this effort, MOSTI has introduced the National Artificial Intelligence Roadmap 2021-2025. MOSTI has also mentioned plans to introduce a comprehensive AI Bill. For the legislations involved in UK for ChatGPT, the UK Government has adopted a cross-sector and outcome-based framework for regulating AI, underpinned by five core principles: safety, security, and robustness; appropriate transparency and explainability; fairness; accountability and governance; and contestability and redress. These principles guide policymaking to ensure ethical and responsible development and deployment of AI technologies across various sectors in the UK.

The agency involved in ChatGPT in Malaysia is MOSTI, while in the UK, there are several agencies involved in ChatGPT, which are several governmental bodies, such as the Office for

Artificial Intelligence (OAI), the Information Commissioner's Office (ICO), and the Centre for Data Ethics and Innovation (CDEI), the Department for Science, Innovation and Technology (DSIT), The Financial Conduct Authority (FCA), and The Office of Communications (Ofcom) play roles in regulating and monitoring AI applications. These organizations collaborate to promote ethical and accountable AI development and implementation across the UK.

From both respondents, in Malaysia, there are no laws explicitly targeting ChatGPT or similar AI technologies. Nevertheless, broader legislation concerning data protection, cybersecurity, intellectual property, and privacy might be applicable to the utilization and implementation of AI technologies. There weren't specific laws in the UK directly addressing ChatGPT or similar AI technologies. However, various laws and regulations may apply depending on the context of its use. These could include data protection laws such as the General Data Protection Regulation, intellectual property laws, consumer protection laws, and regulations related to algorithmic transparency and accountability.

Lastly, the recommendations to improve ChatGPT framework in Malaysia based on UK's framework given by Ms Lee Sim Kuen is that ChatGPT has revolutionised our education system to a new phase as it's used by most educators and learners, it was proved great at enhancing speaking skills of "English as a second language" learners. Hence, it will be excellent to continue the use of it while a legal framework or guidelines must be released as soon as possible to oversee the use of it. However, in Dr. Rajini Kumar a/l Sreedharam's view, he thinks that it's premature to offer recommendations at this stage as the laws regarding this matter are still under discussion.

4.3 Conclusion

Both respondents are chosen because they hold high qualifications and are experts in the field of law. There's yet to have any specific legislations in Malaysia. Instead, the governmental

bodies are putting efforts to release them as soon as possible. In UK, there are no legislations too. However, the UK Government has adopted a cross-sector and outcome-based framework for regulating AI, underpinned by five core principles: safety, security, and robustness; appropriate transparency and explainability; fairness; accountability and governance; and contestability and redress. These principles guide policymaking to ensure ethical and responsible development and deployment of AI technologies across various sectors in the UK. In addition, the only agency involved in ChatGPT in Malaysia is MOSTI, while in the UK, there are several organizations collaborate to promote ethical and accountable AI development and implementation across the UK, such as OAI, ICO, FCA, and more. Furthermore, there are no particular laws in both Malaysia and UK for overseeing AI like ChatGPT. Finally, ChatGPT should be oversee by authorities in Malaysia in the future when there's laws and regulations for it.

CHAPTER 5: CONCLUSION

5.0 Introduction of Every Chapter

In Chapter 1, research background, research problem, research questions and objectives, and research significance are discussed. In these subtopics, AI and ChatGPT is defined, the AI regulations in different areas, such as South Korea, UK and Netherlands are discussed, the AI frameworks in Malaysia and UK, and the legal ambiguities or loopholes, such as the lack of specific AI laws in Malaysia and UK are discussed, the enforcement difficulties with the lack of proper legal frameworks and oversight for AI, the ethics and socio-legal issues implications caused by ambiguous boundaries of moral judgment in AI-driven technologies are discussed, and the use of the research to help providing more understandings for the public and governments to prepare for a more complete and proper AI governance, are discussed.

In Chapter 2, the detailed definition of ChatGPT, the types of ChatGPT, the history of ChatGPT in Malaysia and UK, the laws involved in ChatGPT in Malaysia and UK, and the agencies involved in ChatGPT in Malaysia and UK are discussed. In this subtopics, the introduction of ChatGPT, the generations of ChatGPT such as GPT-1, GPT-2, GPT-3 etc, the history of ChatGPT in Malaysia and UK, such as establishing and emphasizing AI policies, the laws involved in ChatGPT in Malaysia and UK, such as the Personal Data Protection Act 2010 in Malaysia, and the National AI strategy and AI White Paper in the UK, the Agencies involved in ChatGPT in Malaysia and UK, such as the Ministry of Higher Education Malaysia, Malaysia's Ministry of Science, Technology, and Innovation (MOSTI) for Malaysia, and the Department for Digital, Culture, Media, and Sports (DCMS), and the Information Commissioner's Office (ICO) in UK are discussed.

In Chapter 3, the subtopics that are discussed includes the methodology used in the research, why qualitative and exploratory research is used in this research and more. Data collection method utilised in this research is interview. Moreover, primary, and secondary data are collected throughout the whole research. Furthermore, the sampling design includes target population, sampling frame, sampling elements, sampling techniques and sampling sizes are also discussed. On the other hand, face to face interview and semi structured interview is used in this research. Besides, the data processing process includes transcribing and checking, filtering initial data/coding, identifying themes, patterns and relationships, theme review and theme naming, and generating a report. Lastly, there are the questions that were asked during the interview under “Data Analysis”.

In Chapter 4, the biography data of respondents are recorded. For instance, both respondents are experts in the field of law, and at the meantime, they’re both law lecturers in UTAR. Moreover, their professional opinions regarding the questionnaire are recorded too, such as the legislations involving ChatGPT in Malaysia and UK, the agencies involved in ChatGPT in Malaysia and UK, and more.

In Chapter 5, the subtopics as the introduction of every chapter, the discussion of major findings from the questionnaire and the research itself, the implications, and limitations of study, and lastly, the recommendations for future research are discussed.

5.1 Discussion of Major Findings

In the major findings, there is no specific legislations in Malaysia and UK. However, the UK Government has adopted a cross-sector and outcome-based framework to regulate AI, underpinned by five core principles: safety, security, and robustness; appropriate transparency and explainability; fairness; accountability and governance; and contestability and redress. In Malaysia, the only agency involved in ChatGPT is MOSTI, while in the UK, there are several

organizations collaborate to promote ethical and accountable AI development and implementation across the UK, such as OAI, ICO, FCA, and more. Lastly, there are no particular laws in both Malaysia and UK for overseeing AI like ChatGPT. In comparison with existing journal articles that are found, all the answers by the interviewees are accurate. However, there are still some differences between the findings in the research and the interviewees' answers. Firstly, in the research, there's the Malaysia Digital Economy Corporation that intends to lead the entire country for digital transformation of economy, which includes AI technology. Moreover, another agency is the Malaysian Communications and Multimedia Commission that is involved in AI, which includes ChatGPT. Furthermore, in the research, there are also an agency in UK involved in ChatGPT that was not mentioned in the interviewees' answers, which is the Department for Digital, Culture, Media, and Sports (DCMS). Besides, the Centre for Data Ethics and Innovation (CDEI), the Department for Science, Innovation and Technology (DSIT), The Financial Conduct Authority (FCA), and The Office of Communications (Ofcom) are involved in regulating and monitoring AI in UK with their own roles, mentioned in the interviewees' answer. In summary, there are still no specific laws in Malaysia and UK to govern AI entities like ChatGPT while the suggestions to improve ChatGPT framework in Malaysia based on UK's framework is that ChatGPT was proved great at enhancing speaking skills of "English as a second language" learners. Hence, it should be used in Malaysia for this function.

5.2 Implication of Study

This study provides insights for legal authorities and the public of Malaysia. The discussed information in this research is definitely useful to those authorities and public who are determined to contribute a useful hand in setting up a proper and complete legal framework regarding ChatGPT in Malaysia. The findings' result indicate that Malaysia is falling behind from UK in terms of legal framework involving ChatGPT. Through the results of findings, Malaysia has no specific laws and regulations to govern the use of AI entities such as ChatGPT. However, Malaysia has only an agency, which is MOSTI, that is giving a good hand in Malaysia to provide a proper and complete guideline in creating a legal framework for AI entities like ChatGPT.

UK is way in front of Malaysia because they have their AI White Paper, which provides a guideline for creating a legal framework for AI entities. Gaining insights into the legal framework involving ChatGPT in UK can provide Malaysian lawmakers and the public with valuable guidance in developing more proper and complete legal guideline and framework involving ChatGPT. In addition, UK has many departments such as the OAI, ICO, Ofcom, and more, to work hard and create a proper legal framework on governing AI entities like ChatGPT. Moreover, the results show that ChatGPT is a chatbot that can predict the next word or phrase in each sequence of words. Hence, it is very useful to educators and learners. In such, it was proved helpful to the students who are learning English as their second language.

5.3 Limitations of Study

There are a few limitations of study in this research. For example, time constraint, the latency of acquiring data, high time consumption, and the lack of expertise. In terms of time constraint, it was very packed as there were many academic tasks to be finished at the meantime. In terms of the latency of acquiring data, there were several times that there were difficulties to get assistance from targeted lecturers and e-mail replies because of their tight and busy schedules. Moreover, due to the strict request for biography of respondents and their availability, it is time consuming to finish this research because it requires longer time to search for respondents. Hence, the needed time to finish the research is extended. Lastly, the lack of expertise. There are seldom lecturers that are suitable and qualified for this research because it requires a deep knowledge in laws. Hence, it was time consuming to search for suitable candidates.

5.4 Recommendations of Future Research

There are a few reasons of why to conduct this research in the future. Firstly, quantitative research helps researchers to measure the adoption of ChatGPT amongst students with standardized measuring scales. Secondly, it is to understand the helpfulness of ChatGPT to students and recommend changing in teaching and examination methods. For example, ChatGPT can save students' time for searching materials on the internet. Moreover, according to Albayati (2024), ChatGPT can customize the educational process by responding to student inquiries and delivering project evaluation. It may also produce educational materials and plans for lessons. Lastly, a greater number of samples are frequently used in quantitative studies, that can improve the results' applicability to wider group of students. Researchers may arrive at more accurate statements regarding the overall adoption of AI by polling an accurate representation of pupils. In the future, quantitative research regarding the acceptance of ChatGPT amongst students is hoped to be conducted.

5.5 Conclusion

In comparison with UK's AI White Paper, Malaysia should learn from it, and create guidelines according to it by modifying it accordingly. According to the OAI (2023), they require instruments for reliable AI, such as verification methodologies and technological requirements, will be important to allowing accountable AI development while backing the recommended regulatory framework. Moreover, to properly guarantee AI systems, we require guarantee approaches for measuring, evaluating, and communicating their reliability throughout the entire creation and implementation life cycle. Furthermore, in UK, the Portfolio of AI assurance methods was introduced in 2023 to assist inventors in understanding how AI guarantee methods may assist larger AI monitoring initiatives. The Portfolio is a partnership with the industries to demonstrate how these instruments are

currently being used by companies for practical uses as well as how to comply with AI legal guidelines. Lastly, comparison UK's AI White Paper, the assurance methods must be supported by existing technological requirements, which enable consensus throughout guaranteed practitioners. Several worldwide and local standards-setting organizations are preparing or have previously issued AI-specific technical guidelines focusing on issues like as risk administration, openness, prejudice, security, and resilience.

As recommendations, except for learning from UK's AI White Paper, Malaysia can set up a committee inside MOSTI and collaborate with policy makers to set up guidelines and laws for AI entities like ChatGPT as soon as possible because in the future, the usage of AI is increasing significantly and at the end, it is inevitable that everyone will utilise AI in industries and fields such as students, engineers, vehicle manufacturers, and more. Moreover, since that ChatGPT is a foreign country, Malaysia must come up with laws and regulations to deal with breaches of law by AI entities such as ChatGPT if there's any. For example, if ChatGPT needs to get license before a given deadline to continue running in Malaysia, and if it has breached the law, such as personal privacy, OpenAI needs to be penalised. Hence, a proper and complete legal framework for AI entities is needed as soon as possible to protect users.

At the beginning of this chapter, a summary of every chapter is discussed. Moreover, there are some discussions of major findings from interviewees and the findings in this research and are compared to check the correctness. Furthermore, in terms of the implication of study, this research is definitely helpful for the lawmakers and the public for setting up a proper legal framework involving ChatGPT as it provides the insights and lacking laws for AI entities like ChatGPT. Next, the limitations of study are latency of acquiring data, high time consumption, and the lack of expertise. In the future, quantitative research regarding the acceptance of ChatGPT amongst students is hoped to be conducted. Finally, this research has an ultimate goal as to raise the awareness of the importance of a proper and complete legal framework of ChatGPT in Malaysia.

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Appendix

Appendix A: Interview Questionnaire

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ID: 20UKB03424

FYP Topic: A comparative study between the legal framework of ChatGPT in Malaysia and United Kingdom (UK)

Supervisor: Dr. Angelina Anne Fernandez

Questionnaire:

Q1. What is the definition of ChatGPT?

Q2. What is the History of ChatGPT in Malaysia?

Q3. What is the History of ChatGPT in UK?

Q4. What are the Legislations involving ChatGPT in Malaysia?

Q5. What are the Legislations involving ChatGPT in UK?

Q6. What are the Agencies involved in ChatGPT in Malaysia?

Q7. What are the Agencies involved in ChatGPT in UK?

Q8. What are the Laws involved in ChatGPT in Malaysia?

Q9. What are the Laws involved in ChatGPT in UK?

Q10. What are the recommendations to improve ChatGPT framework in Malaysia based on UK's framework?