Department for
Science, Innovation
& Technology

Department
for Culture,
Media & Sport

Copyright and
Artificial Intelligence

Statement of Progress under Section 137 Data
(Use and Access) Act

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Presented to Parliament pursuant to Section 137 of the Data (Use and Access) Act 2025 ("the D(UA) Act")

December 2025

Copyright and Artificial Intelligence

Statement of Progress under Section 137

Data (Use and Access) Act

This statement is made pursuant to Section 137 of the Data (Use and Access) Act 2025 ("the D(UA) Act"). It describes the work undertaken by the Department for Science, Innovation and Technology, working jointly with the Intellectual Property Office, and the Department for Culture, Media, and Sport, as it prepares to publish the Report and Impact Assessment required by Sections 135 and 136 of the D(UA) Act.

Sections 135 and 136 of the D(UA) Act require the Secretary of State for Science, Innovation and Technology to prepare and publish, before 18 March 2026:

1. **An economic impact assessment**. This is required by Section 135 of the Act. It must include an assessment of each of the options put forward in the government's consultation on copyright and AI. It may also include alternatives to these options. It must include an assessment of the economic impact of each option on copyright owners and AI developers, including individuals, micro, small, and medium-sized businesses.

2. **A report on the use of copyright works in the development of AI systems**. This is required by Section 136 of the Act. It must consider each of the four options put forward in the government's consultation on copyright and AI. It may also consider alternatives to these options. In particular, it must consider and make proposals in relation to each of the following:

   a. technical measures and standards that may be used to control the use of, and access to, copyright works to develop AI systems;

   b. the effect of copyright on access to, and use of, data by developers of AI systems (for example, on text and data mining);

   c. the disclosure of information by developers of AI systems about their use of, and access to, copyright works for the purpose of developing those systems;

   d. the granting of copyright licences to developers of AI systems;

   e. enforcement of rules relating to the use of, and access to, copyright works to develop AI systems, including enforcement by a regulator.

The report must consider AI systems developed outside the UK, as well as those developed within the UK. It must consider the likely effects on copyright owners and AI developers, including individuals, micro, small, and medium-sized businesses.

Contents of this progress statement

This progress statement outlines the government's work to date on copyright and AI, and the further steps we are taking as we prepare the report and economic impact assessment. It summarises the themes and structure of the report and impact assessment. This document is a statement of progress towards publication of the report and impact assessment and is not intended to pre-empt them. The government will be publishing the report and impact assessment by 18 March 2026.

The government's work on copyright and artificial intelligence

The Consultation on Copyright and Artificial Intelligence

The government consulted on potential changes to UK copyright law between 17 December 2024 and 25 February 2025. The consultation paper was published jointly by the Department for Science, Innovation and Technology, the Intellectual Property Office, and the Department for Culture, Media and Sport.

In the consultation paper, the government set out three objectives for reforms in the area of copyright and AI training. These were:

- **Control:** Right holders should have control over, and be able to license and seek remuneration for, the use of their content by AI models

- **Access:** AI developers should be able to access and use large volumes of online content to train their models easily, lawfully, and without infringing copyright

- **Transparency:** The copyright framework should be clear and make sense to its users, with greater transparency about works used to train AI models, and their outputs

The consultation also set out three broad options for intervention in this area, as well as a "do nothing" option. Each of the options comprised a package of measures, including potential changes to copyright law, as well as supporting measures on aspects such as transparency and technical standards.

These options were:

- **Option 0:** Do nothing: Copyright and related laws remain as they are

- **Option 1:** Strengthen copyright requiring licensing in all cases

- **Option 2:** A broad data mining exception

- **Option 3:** A data mining exception which allows right holders to reserve their rights, underpinned by supporting measures on transparency (government's preferred option)

The consultation sought views on these options, as well as on individual aspects of a potential approach to AI training. Questions covered areas including transparency, technical standards, and licensing.

In addition to AI training, the consultation also considered issues relating to AI outputs. These included the extent to which copyright should apply to computer-generated works, labelling of generative AI outputs, and emerging issues such as digital replicas.

The consultation paper was published online. To make the consultation more accessible and increase the range of responses, members of the public were able to respond either through the government's online consultation service, Citizen Space, or by email direct to the Intellectual Property Office.

Analysis of consultation responses

In total, a little over 11,500 responses were received – 10,112 via the government's online survey service, Citizen Space, and over 1,400 by email. Responses were received from a range of parties, including: creators and right holders, developers of AI models and applications, academics, researchers, cultural heritage organisations, and legal professionals. As well as responses from organisations such as businesses and representative groups, there were a significant number of responses from individuals. Over 3000 of the responses - just under a third - were based on template letters, or template survey responses, created and distributed by interested organisations.

Following closure of the consultation, the government committed that every response to it should be read and analysed by a human without the use of AI or other automated tools. The Intellectual Property Office created a taskforce of approximately eighty existing intellectual property policy officials and analysts to review the responses. The taskforce identified unique themes relating to each question and the overall positive or negative sentiments in relation to each. More complex views and ideas, such as supporting a particular type of licensing, or providing a view on a specific proposal within the consultation, were captured. Quality assurance was undertaken to ensure consistency in the way responses were interpreted.

Coding the responses thematically allowed us to identify common associations between responses. For example, support for licensing of copyrighted works often aligned with support for greater transparency around the use of such works for training AI. This meant we could identify which combinations of policies were supported by respondents, even where they were not directly consulted on.

Of those who responded through the government's online survey service, Citizen Space, 88% expressed support for option 1 - require licences in all cases. The remaining options presented in the consultation, in order of preference were: making no changes to copyright law (option 0, supported by 7% of respondents); introduction of an exception to copyright for all text and data mining purposes with rights reservation (option 3, the preferred option in the consultation, supported by 3% of respondents); and introduction of an exception to copyright for all text and data mining purposes with no rights reservation (option 2, supported by 0.5% of respondents). 1.5% of respondents did not indicate a preferred option. Although not all email responses explicitly stated a preference, these same sentiments were generally reflected across those responses.

There was also strong support across the creative industries for the introduction of statutory transparency measures in relation to AI training to support licensing of copyright works. Respondents from the tech sector had mixed views on transparency, with many supporting non-legislative approaches, or light-touch regulation. Regardless

of their preferred option, respondents generally expressed a clear desire that future changes should minimise additional administrative or financial burdens.

This distribution of preferences partly reflects the large response to the consultation from individual creators and the creative industries. When considering responses from different sectors, most of those from the creative industries were strongly against the option which, in the consultation, was framed as the preferred one, and in favour of requiring licenses in all cases. Most of those from the technology sector, including AI developers, favoured option 3 – the exception with rights reservation – and option 2 – the broad exception. There were also numerous proposals for new or modified options. For example, several respondents proposed targeted exceptions which focused on activities such as research.

Copyright laws must protect creative works, whilst also ensuring the UK reaps the transformational benefits of AI and keeps our place as one of the world's top innovators and economies. We are continuing to consider all options and will provide a detailed summary of consultation responses on each of the options and the specific technical areas as part of our report.

Stakeholder engagement and working groups

To inform our approach, and ensure that any policy proposals are properly informed by the views of cross-sectoral experts, the government continues to engage extensively on copyright and AI across a wide range of stakeholders.

The Secretary of State for Science, Innovation and Technology and the Secretary of State for Culture, Media and Sport convened roundtables bringing together representatives of the creative, media and AI sectors, and academia. The first two roundtables were held in July, and the third in September. Following on from these initial meetings, officials have met members of the roundtables and other stakeholders extensively to discuss issues in more detail. Expert technical working groups have also been convened on four themes:

- **Control and Technical Standards.** This group met on 25 November 2025. It is exploring what makes technical tools and standards effective for controlling content use, their current limitations, and whether legislation or guidance is needed to drive adoption and compliance.

- **Information and Transparency.** This group met on 2 December 2025. It is exploring what legal transparency duties could include (e.g. training data summaries, crawler disclosures) to address concerns from the creative industries without being overly burdensome for AI developers, and how they could vary by actor type.

- **Licensing.** This group met on 4 December 2025. It is considering the strengths and weaknesses of the current licensing framework, especially for smaller creators and is looking at potential ways to facilitate licensing.

- **Wider Support for Creatives.** This group met on 24 November 2025. It is considering additional protections for the creative industries.

The working groups collectively have over 50 different members, each bringing their own expertise and perspective. They include experts from music, publishing, film, visual art, videogames, collective management organisations, research, academia, and technology, including AI developers. The working groups provide a space for expert stakeholders to explore complex policy questions, share technical insights, and help shape practical solutions. They form a critical part of the government's commitment to work closely with experts to ensure our approach to copyright and AI drives up creativity and innovation, helps our leading AI sector and creative industries to thrive, and delivers growth for UK citizens. The government's upcoming report on the use of copyright works in the development of AI systems will reflect the work of these groups and the wider stakeholder engagement.

Alongside these working groups, the Secretary of State for Science, Innovation and Technology and the Secretary of State for Culture, Media and Sport have convened a cross-party Parliamentary working group. This has so far comprised a meeting in October with interested Members of Parliament, and a meeting in November with interested Peers. These

have provided an open forum to discuss and update Parliamentarians on the government's policy principles in this important area. Parliamentarians expressed views on key issues including transparency, licensing, creator remuneration, the need for technically workable solutions, and the UK's competitive advantage. The views of this group will be reflected in the government's upcoming report on the use of copyright works in the development of AI systems. In addition, the government is following the Lords Communications and Digital Committee's inquiry on AI and copyright with interest and will engage constructively with this work.

Preparation of the Economic Impact Assessment

The Department for Science, Innovation and Technology, working jointly with the Intellectual Property Office, and the Department for Culture, Media, and Sport, has commenced work on the economic impact assessment committed to in the D(UA) Act. This builds on the impacts identified in the Summary Assessment of Options published on 17 December 2024. The government is considering evidence submitted as part of the consultation process alongside wider evidence, including on evolving AI activity in the UK, the licensing market, emerging research, and developments in other jurisdictions such as the EU.

Report on the use of copyright works in the development of AI systems

As set out above, the Department for Science, Innovation and Technology, working jointly with the Intellectual Property Office, and the Department for Culture, Media, and Sport will prepare a report on the use of copyright works in the development of AI systems, and in relation to AI outputs. This will consider the options set out in the consultation, as well as other options that may be taken forward. It will also set out in detail the responses to the consultation and will consider the specific areas required by the D(UA) Act relating to access to and use of data, technical measures and standards, disclosure of information by AI developers, copyright licensing, and enforcement of copyright.

Next steps

Our creative industries are one of this country's greatest economic and cultural strengths and we are determined that they continue to thrive. Meanwhile, AI offers the most powerful lever we have for national renewal; it sits at the heart of the government's plan to kickstart an era of economic growth. The government will continue to work on the full report and economic impact assessment required by the D(UA) Act. These documents will be laid before Parliament before 18 March 2026.