

READR – Position Paper on AI Rights Frameworks

Prepared for the BFI

February 2026





About the authors



Alma Economics combines unparalleled analytical expertise with the ability to communicate complex ideas clearly.

www.almaeconomics.com

About the commissioning organisations



The BFI is a cultural charity, a National Lottery distributor, and the UK's lead organisation for film and the moving image.

www.bfi.org.uk

This report was commissioned as part of the BFI's Rapid Evidence Assessment & Data Reviews (READR) initiative. The aim of READR is to deliver shorter, targeted reports underpinned by data and evidence to provide rapid, responsive insight for the UK screen sector. READR reports will be used to shape policy and strategically guide the sector. This report is authored by Alma Economics, the BFI's appointed research supplier for READR

Table of Contents

Context, background, and approach	1
AI governance and regulation in the screen sector	1
Aims of the research: Bridging the knowledge gap	1
Research methodology	2
Report structure	2
1. State of play: AI, copyright, and ethics	4
Introducing the legal and regulatory matters in scope	4
Existing UK regulatory landscape on AI, copyright, and ethics	4
Copyright considerations	5
Authorised use	6
Ethics issues	8
What are screen sector stakeholders asking for?	9
2. Frameworks and codes of practice	11
3. Assessment framework	14
4. Emerging developments from other jurisdictions	16
5. Conclusion	18
Licensing of third-party-owned screen content for generative AI training	18
Use of generative AI to create or enhance screen or audiovisual outputs	19
6. References	20

Context, background, and approach

AI governance and regulation in the screen sector

The direct use of Artificial Intelligence (AI) within the UK's screen sector can be mapped to two broad categories. First, as outlined in the *AI in the Screen Sector* report by CoSTAR Foresight Lab,¹ is the use of AI in the production lifecycle, where AI is used during the production of screen content, or in pre-production and post-production. Second is the use of copyright-protected screen content in training generative AI models by AI developers.

These uses of AI within the screen sector have given rise to concerns regarding the regulation and governance of such AI use. From a regulatory perspective, these concerns (detailed further in Chapter 1 of this report) primarily relate to copyright and allied rights, including personality rights (also known as publicity rights), contractual issues (including transactions between sector stakeholders), and ethical issues (including transparency obligations; ethical obligations can also overlap with legal provisions relating to copyright and personality rights). As Chapter 1 of this report details, screen sector stakeholders in the UK have voiced their concerns on these fronts, seeking clarity, regulation, and governance.

The UK does not currently have dedicated legislation for the regulation and governance of AI and its use;² there have also not been any amendments to the Copyright, Designs and Patents Act, 1988, specifically regulating the use of AI.³ The only legislation that specifically relates to AI is the Data Use and Access Act, enacted earlier in 2025, and the extent to which this Act covers AI issues is also currently limited in scope (as further expanded on in this report).

The enactment of the Data Use and Access Act occurred in the wake of other policy developments by the UK Government aimed at regulating the use of AI. The most notable of these developments is the AI and Copyright Consultation,⁴ the outcomes of which have been referenced in the Data Use and Access Act. Alongside these policy developments, and in the absence of targeted legislation governing AI,⁵ the screen sector has developed various codes of practice, including governance frameworks and principles. These are mechanisms by which the sector has attempted to self-govern its use of AI in relation to its interaction with copyright issues and ethical concerns.

Aims of the research: Bridging the knowledge gap

Alma Economics was commissioned by the British Film Institute (BFI) to carry out a review of codes of practice that guide the use of AI and its interplay with copyright and ethics. For this research, we have analysed existing codes of practice against an assessment framework, exploring aspects relevant to the screen sector, its stakeholders (e.g., producers, actors, directors, streamers, distributors, etc.), and their relationships with each other. Emerging policy insights around these topics in international jurisdictions have also been synthesised to draw on examples of best practice or innovation beyond the UK.

¹ BFI and CoSTAR Foresight Lab. 2025. 'AI in the Screen Sector: Perspectives and Paths Forward A Foresight Lab Report'. June 2025. See [here](#).

² The lack of targeted legislation was a deliberate decision of the previous conservative Government in favour of what they termed as a pro-innovation approach and strategy. See [here](#).

³ Section 9(3) of the Copyright Designs and Patents Act, 1988, read with Section 29A of the same legislation.

⁴ Government of UK, December 2024. Copyright and AI: Consultation. See [here](#).

⁵ For clarity, there are provisions of the Copyright Act and Data Protection Act, and UK GDPR that are applicable to and govern the use of AI within the screen sector (as shown in later sections of the report).

This research aims to equip the screen sector with a robust and clear understanding of AI regulation and governance, such that it can effectively contribute to policy on these areas and formulate next steps relevant to the respective concerns of various sector stakeholders. It aims to achieve this through the following specific objectives:

- Improve awareness of governance and regulation of the use of AI within the screen sector, and its interplay with copyright and ethical considerations.
- Build on the sector's understanding of these codes of practice and how they impact sector outputs and relationships amongst relevant stakeholders.
- Improve awareness of developments and policy thinking in other relevant jurisdictions around the regulation and governance of AI and its interaction with copyright and ethics.
- Enable the sector to form a clear, well-evidenced position on next steps around the regulation and governance of AI and its use within the screen sector.

AI technologies are developing rapidly, as are both the research and policy debate surrounding them. As such, it is important to understand this publication as a snapshot in time.

Research methodology

Our approach has included a detailed desk-based review of existing regulation, policy developments, and codes of practice (including governance frameworks, principles, and guidelines) in the UK and internationally. This review encompassed academic literature, commentary, Government policy documents, as well as union-led open letters, enabling a thorough understanding of prevailing concerns and stakeholder demands in relation to AI and its interplay with copyright and ethics.

Following a review of the regulatory landscape, we developed an assessment framework to analyse the various codes of practice. The assessment framework includes specific features of various codes of practice relevant to the sector, such as remuneration and governance. This assessment framework aims to provide a blueprint for understanding AI-related regulatory instruments, and can be updated and applied for analysis of any legislation and/or code of practice for future exercises of this nature.

We also conducted nine interviews with stakeholders for insights into the state of play around AI governance and regulation in the creative sectors, bridging gaps in the literature review. Stakeholders we consulted with included UK Government executives, representatives from tech companies, AI developers, trade unions, professional networks, virtual production companies, and other content creation companies that use AI.

Report structure

The structure of the report is as follows:

- **Chapter 1** introduces the current state of play in the UK screen sector on copyright and ethics-related issues. In this chapter, we have outlined the existing UK legal provisions on AI and have introduced the various concepts relating to copyright and ethics in AI use in the screen sector. We have also explored what relevant screen sector stakeholders are asking and advocating for in relation to copyright and ethics matters.
- **Chapter 2** introduces the various codes of practice currently in the UK screen sector that guide the use of third-party screen content for AI training or outputs.

- **Chapter 3** analyses two select codes of practice against an assessment framework that enables review of codes of practice against key terms, such as jurisdiction, compensation, and others. The assessment framework that has been developed for this research creates a blueprint of key terms relevant to the use of third-party-owned content, data, and likeness commercially – either for AI training and/or in outputs. This can be used to aid the analysis of future codes of practice relevant to the sector.
- **Chapter 4** presents the concluding findings of this short report, incorporating findings from interviews, as well as the secondary review of evidence.

DRAFT

1. State of play: AI, copyright, and ethics

Introducing the legal and regulatory matters in scope

This chapter outlines the state of play on generative AI,⁶ copyright, and ethics in the screen sector. We first outline the existing legal provisions in the UK that apply to the various copyright and ethical considerations at play. Then, we introduce copyright issues at play in the use of generative AI in the screen sector, followed by an unpacking of the various ethical considerations at play in the use of generative AI within the sector. Finally, we explore what various screen sector stakeholders and AI developers/tech firms are asking for in terms of regulatory clarity and/or contractual considerations.

This chapter aims to provide a high-level understanding of key themes, concepts, and the overall regulatory and commercial landscape, as a first step before the various codes of practice are unpacked in the later chapters.

Existing UK regulatory landscape on AI, copyright, and ethics

Existing legislative provisions and policy developments governing AI and copyright in the UK can be summarised as follows:

1. Copyright, Designs and Patents Act 1988

The Copyright, Designs and Patents Act 1988 (CDPA) regulates copyright in creative works, including scripts, music, sound recordings, and audiovisual content. This Act includes provisions on copyright of ‘computer-generated works’, including authorship of such work, under section 9(3). The CDPA provides an exception to copyright infringement for text and data mining for non-commercial research, upon lawful access to such materials, under section 29A. This exception is generally understood to apply to the use of copyright-protected materials in AI training as well, provided this is accessed lawfully (i.e., requiring authorisation and/or licenses) and provided the purpose is non-commercial.

The CDPA does not include any explicit provisions governing the use of copyright-protected material in Generative AI training or outputs. It also does not include any clarity on whether all AI-generated outputs can be understood as ‘computer-generated works’ as under Section 9(3) of the CDPA.⁷

Notwithstanding the above, our understanding is that UK rightsholders in the screen sectors agree that the CDPA, as it stands, prohibits the use of copyright-protected materials for AI training (both commercial and non-commercial), without their explicit consent.

2. The Government’s Copyright and AI Consultation

The limitations of the CDPA have been acknowledged by the UK Government in its Copyright and AI consultation,⁸ as giving rise to varying, often contrasting positions amongst rightsholders and AI developers. According to the Government, legislative clarity on key open points forms the key motivation behind the consultation.

⁶ Generative AI is a subset of AI capable of generating text, images, video or other forms of output by using probabilistic models trained across one or more domains (UK Government Digital Service, December 2025. AI Insights: Generative AI. See [here](#)). In contrast, a large language model (LLM) is a generative AI tool that focuses on creating human-like text. Examples include Gemini, and Chat GPT (House of Lords Library, December 2024. Large language models and generative AI: House of Lords Communications and Digital Committee report. See [here](#))

⁷ There is debate amongst creative industry stakeholders about the extent to which AI-generated outputs involve human involvement and input, and whether these qualify as “computer generated works” for the purposes of the CDPA, and who the author and/or owner of such works should be. As this chapter will show, authorship of creative content, determines ownership of copyright in such content, and are therefore critical to this discussion.

⁸ Government of UK, December 2024. Copyright and AI: Consultation. See [here](#).

On the use of third-party-owned content in Generative AI training, the consultation acknowledges that, *“Some AI developers argue that existing legal exceptions in UK copyright law allow them to use copyright works when conducting training activity in the UK... But right holders reject these arguments. They maintain that, by making copies of their works to train models, AI developers are infringing their copyright in the UK.”* Accordingly, the Government aimed, by way of the consultation, *“to clarify the rules in this area and establish a fair balance in law.”*

Similarly, on AI-generated outputs, the Government aims to reconcile the *“debate about whether this balance within copyright law relating to the outputs of AI is right, between the traditional creator, the level of human input AI software might have, and the right holders in such works.”*

As of December 2025, the UK Government has published the results of this consultation; notably, this does not make any changes to existing law.⁹

3. Data Use and Access Act 2025

The Data Use and Access Act 2025 introduced obligations for the UK Government to assess the economic impact of AI and its various proposed copyright policy options in the Copyright and AI consultation. However, it does not currently have any binding legal provisions governing AI use in the UK's creative sectors. In its progress update published in December 2025, the Government has noted that it will continue to work on the economic impact assessment required by the Act and present it to the UK Parliament before March 2026.

4. Data Protection Act, 2018 and UK General Data Protection Regulation (GDPR)

The provisions of the Data Protection Act 2018 and UK GDPR apply where personal data is used in AI training or outputs. Primarily, these govern aspects such as transparency and disclosure obligations on the use of personal data and informed consent. The Information Commissioner's Office provides detailed guidance on the applicability of the Data Protection Act and GDPR to AI use of personal data.¹⁰

Copyright considerations

Copyright represents the bundle of legal rights vesting in authors of creative works; specifically, creative content relevant to the screen sector, such as literary works (e.g., scripts), musical works (e.g., compositions), sound recordings (i.e., the recordings of music), and cinematographic works (i.e., film and television content).¹¹ Typically, authors of creative works are the first owners of copyright, unless the work is commissioned and/or created in the course of employment. Authors may also transfer ownership of copyright through an assignment (wholly), or through a license (partly, subject to the license). In the UK, owning copyright in the creative works identified above provides relevant copyright owners with all or a combination of the following rights: rights to reproduce or copy the work, rights to distribute the work, rights to make of an adaptation of a work, rights to rent or lend the work, rights to perform the work (includes showing or playing of the work in public), and rights to transmit it via the internet.¹²

⁹ Copyright and artificial intelligence statement of progress under Section 137 Data (Use and Access) Act, December 2025. See [here](#).

¹⁰ Information Commissioner's Office, 2025. Legal framework. See [here](#).

¹¹ Literary, dramatic, artistic, and musical works are typically known as 'underlying works' for sound recordings and cinematographic works, as the creation or development of the latter types of content will typically include the aforementioned underlying works.

¹² For sound recordings and for audiovisual works such as film and television content, copyright provides only the rights against reproduction and copying, performance or making available, broadcasting, and transmitting on the internet. The right of adaptation is not available to owners of copyright in cinematographic works and/or sound recordings. When cinematographic films and/or sound recordings are created, there is an

Where AI has been used to create or produce screen content, or where copyright-protected material has been used to train generative AI models, relevant involved parties must navigate certain copyright considerations, such as ownership of rights in the works being so used, and getting the relevant authorisation from these rightsholders. Unauthorised use of copyright-protected material typically occurs when there has been third-party exploitation of copyright (See Figure 1 on relevant parties in this context), without relevant permissions and/or licenses from owners of copyright.

In the context of Generative AI used in the screen sector, we understand that the unauthorised use of copyright-protected content can occur in the following ways:

- **Unauthorised use of copyright-protected material by developers of Generative AI models in training.** Such unauthorised use can directly lead to the infringement of copyright. For example, a recent [media report](#) noted that sources of AI training data include more than 130,000 film and TV show scripts.¹³ The report described that in the majority of instances, the copyright-protected material was used without the permission of rightsholders and without compensation.
- **Unauthorised use of copyright-protected material by third-party users of generative AI in outputs.** This can occur in the creation of screen content using generative AI by third-party users, that, as outputs, infringe copyright owned and/or controlled by rightsholders. Relatedly, our review of secondary sources has shown that there are concerns amongst rightsholders about the questions of ‘authorship’ and ‘ownership’ of copyright in audiovisual works (parts or whole) that are created using Generative AI,¹⁴ and where relevant, how these interact with copyright ownership in underlying works (e.g., scripts or synchronised music). We understand that screen sector stakeholders can often act as both rightsholders and users in this context, with diverse interests.

Authorised use

For use of copyright-protected material in relation to generative AI, including in training AI models and/or in the creation of AI-generated creative outputs to be ‘authorised use,’ this requires relevant permissions and/or contracting (including through licensing) between rightsholders and users of copyright. Such contracts and licenses would include terms on remuneration to rights holders for the use of copyright-protected materials, transparency obligations, disclosure obligations, and related aspects. Depending on the use, in a third-party use context, this will ideally require the development of clear and strong terms of use.

Clarity on key mechanisms needed to support authorised use in generative AI training

Whilst the existing text and data mining exceptions to copyright infringement under Section 29A of the Copyright, Designs and Patents Act 1988 are generally understood by many within the sector to apply to the use of third-party-owned content in training generative AI models for non-commercial purposes, as noted above, there is limited consensus amongst stakeholders on how commercial uses of

adaptation of underlying works, such as dramatic or literary works (i.e., a film cannot be created without a script and/or a song cannot be recorded without a performance of the composition), this typically is undertaken commercially by way of a license, assignment, and/or through the commissioning of such works by film producers.

¹³ The Hollywood AI Database, November 2024. The Atlantic. See [here](#).

¹⁴ A Cambridge University report argues for a legal exclusion of copyright eligibility for creative works generated solely by AI, ensuring copyright remains for human-authored output. Whilst not directly put forward by screen sector rightsholders, the authors have contextualised this specific consideration in the context of the use of Generative AI within creative industries and its impact on creative labour. This is also directly related to the applicability of existing copyright provisions on the ‘authorship’ of content created using AI, and who would own copyright in such cases. University of Cambridge, February 2025. AI, Copyright and Productivity in the Creative Industries. See [here](#).

copyright protected content should be navigated. In particular, aspects such as approach to licensing, compensation, and royalty distribution are debated topics. For instance, the UK Government, through its consultation on Copyright and AI, proposed a possible “opt out” mechanism, requiring rightsholders to specifically “opt out” of having their content used for training of generative AI models; however, this has received pushback from rightsholders.¹⁵

Notwithstanding the UK Government’s ongoing attempts to introduce legal clarity on key topics, existing law mandates that permissions and licenses are required for any commercial use of third-party-owned content. From our interviews with industry participants, we understand that the AI model data scraping mechanism is known to make it technically challenging to reconcile commercially relevant aspects such as: (i) how to determine who the relevant rightsholders are to obtain the relevant authorisations and licenses; and (ii) how to determine remuneration and how such remuneration should be distributed amongst relevant parties.

Questions of ownership of AI-generated creative outputs

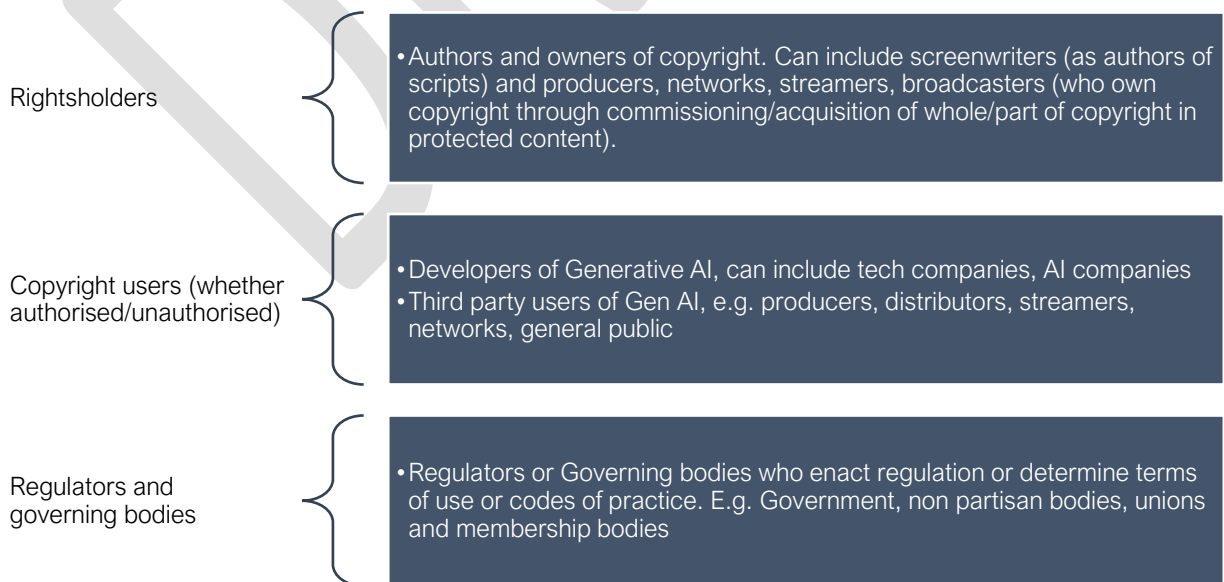
In cases where generative AI is used to develop new creative content, there are additional open questions on how approaches to ownership of copyright are to be navigated (i.e., who the owner of copyright of such content is), with these questions becoming particularly pertinent where underlying works are involved and/or where rights of multiple stakeholders are involved (e.g., co-productions).

In the absence of explicit legal provisions on transfer of ownership, some codes of practice (including licensing frameworks, principles, and guidelines) have been developed by sector stakeholders to enable, streamline, and navigate such transactions, while others are currently in development. These are discussed in the next chapter.

Who are the relevant parties in the above context?

Figure 1 below provides a visual depiction of the positions of the relevant parties in the above contexts, as stakeholders of the screen sector.

Figure 1. Key screen sector parties in the context of copyright issues



¹⁵ The most recent evidence of this pushback is from the results of the consultation published in December, 2025, which reports that 88% of respondents support licensing in all cases where third party material is used for AI training. Copyright and artificial intelligence statement of progress under Section 137 Data (Use and Access) Act, December 2025. See [here](#).

Ethics issues

In this section, we define ethical issues as considerations that are closely aligned with general ethical principles and consistent with the principles of the human rights approach to AI use recommended by UNESCO, including:

- Proportionality and protection from harm
- Transparency and accountability
- Upholding people's right to privacy and data protection
- Ensuring human oversight and determination
- Ensuring fairness and non-discrimination¹⁶

Notably, some of these ethical considerations (e.g., transparency) are critical first steps to resolving copyright-related considerations noted above (e.g., determining where licenses and permissions are required).

Our review has identified these key ethical issues relating to AI in the screen sector:

- **Unauthorised use of performers' likeness, voice, image, and personal data in the life cycle of audiovisual production.** Our review of the evidence base indicates that there are concerns amongst sector stakeholders around the responsible use of the likeness of performers.¹⁷ The use of Gayanne Potter's cloned voice for ScotRail's AI announcements¹⁸ without her full and informed consent and against original contract assurances has been described as a demonstrable case of unauthorised use of an artist's voice and likeness.¹⁹ The ethical considerations at play in this context include informed consent on the part of actors and performers, and opportunities for them to negotiate fair contracts and proportionate remuneration for the use of their likeness and personal data.
- **Replacing human creativity and labour with AI.** A key ethical consideration highlighted by the screen sector is that AI may replace skilled workers and human creativity across production workflows. The CoSTAR report, referenced previously, highlights sector-wide concerns about job security and calls by creative technologists to bridge knowledge and skills gaps in AI. There are also ethical concerns about loss of human creative control. A study by Queen's University Belfast²⁰ surveyed individuals working in the film, TV, and video games industries, who voiced concerns about the ethics of AI use, with some seeing it as a threat to creative integrity and raising concerns about the homogenising of creativity by averaging out unique artistic expressions. A 2023 KPMG report, Generative AI and the UK labour market,²¹ estimated that creative sectors have amongst the highest number of jobs affected by AI, with creative occupations seeing some of the largest shares of tasks being susceptible to automation.

¹⁶ UNESCO, 2024. Ethics of Artificial Intelligence. See [here](#).

¹⁷ Megaphone. 2025. 'Open Letter to PACT: We Demand Better in AI for Film & TV!' See [here](#).

¹⁸ Equity. May, 2025. 'Scotrail voice clone is "exploitative" behaviour, says Equity'. See [here](#).

¹⁹ Notably, the claims of unauthorised use were made against the Swedish tech firm, ReadSpeaker, who allegedly breached contractual terms on use of Potter's voice; Scotrail announced recently that it would be using an alternative AI onboard announcer. BBC, 2025. ScotRail has a new AI announcer after 'stolen voice' row. See [here](#).

²⁰ D Phillips, D Brice, E Phillips, D Lydon, JR Chang. 2024. 'AI screen skills study'. Queen's University Belfast. See [here](#).

²¹ KPMG. 2023. 'Generative AI and the UK labour market'. See [here](#).

- **Wider ethical imperatives.** These include concerns around the carbon impacts of AI on the screen sector's ongoing efforts to minimise its carbon footprint, given the computational resources required for training and operating AI models, and related high levels of energy consumption.²² This poses challenges for the screen sector's sustainability goals. This has not been reviewed as part of this report.

What are screen sector stakeholders asking for?

Having mapped the various concerned parties in legal or regulatory contexts to specific screen sector stakeholders, we proceed to examine what these screen sector stakeholders are asking and advocating for in terms of regulation of AI, copyright, and ethics. An understanding of what sector stakeholders are asking for helps contextualise this research and introduce the key constituent elements of the various codes of practice that are analysed in the following chapter. Below, we include findings from a review of secondary sources, and those from our interviews with sector stakeholders and technology companies.

Rightsholders seek transparency, accountability, and proportionate remuneration

The Creative Rights in AI Coalition, representing UK screen sector rightsholders, has called for regulatory mechanisms (primarily through the enforcement of existing law and strengthening of the Data Use and Access Act prior to it being enacted) that enable rightsholders' informed consent, and fair remuneration before their creative works are used to develop Generative AI models.²³ The Coalition also welcomed comprehensive transparency requirements for disclosure of sources of training data used by these Generative AI models.²⁴ In both cases, copyright and ethical considerations overlap.

From our interviews with sector stakeholders, we understand that rightsholders see the existing Copyright, Designs and Patents Act 1988 provisions on licensing as clear and without ambiguity, suggesting that existing provisions within the Act should be enforced more strictly, with the onus being on AI developers and technology companies to license the creative outputs they use.

Screen sector performers seek stronger enforcement of personality rights and updated contracts

Equity, a trade union representing screen sector performers, has called for amendments to existing law to enhance the enforceability of performers' personality rights (e.g., artists' covering voice, likeness, and personal image).²⁵ This extends both to the use of performers' rights in training generative AI, and also in use through outputs. These are primarily ethical concerns (though personality rights are considered IP rights when monetised).

Notably, Equity's advocacy on behalf of its members also highlights the importance of up-to-date contractual terms governing the use of actors' and performers' likeness, personal data in the production lifecycle (including future use), and related consent and remuneration.

We understand from our review of secondary sources and anecdotally from interviews that the use of performers' likenesses, voices, and personal data (and other third-party content) is taking place within the UK screen sector, and related contracts and clearances are also being finalised in the sector.

²² London School of Economics, September 2025. What direct risks does AI pose to the climate and environment? See [here](#).

²³ Creative Rights in AI Coalition, 2025. News. See [here](#).

²⁴ UK Parliament House of Lords Library, January 2025. Copyright and artificial intelligence: Impact on creative industries. See [here](#).

²⁵ Equity, February 2025. Equity's Copyright and AI Consultation Response. See [here](#).

However, there is no empirical evidence as to the scope or extent of authorised use versus unauthorised use in this regard.

Generative AI model developers and technology firms seek a balanced licensing landscape

As the *AI in the Screen Sector* report by CoSTAR Foresight Lab notes, AI developers and tech companies developing generative AI models have highlighted the importance of policy frameworks and a regulatory environment that balances responsible, ethical, and legally compliant access to data, whilst allowing developers to experiment with and advance generative AI technologies.²⁶ This need for balance has been echoed by the UK Government in its Copyright and AI consultation.

Separately, we understand from our interviews that AI developers and tech companies see challenges in access to data for AI training, such as hurdles in licensing, as holding back innovation and preventing the UK from taking a leading role in shaping future AI development.

Scepticism around licensing for generative AI training

Whilst existing copyright law requires relevant authorisations and licenses for any commercial use of third-party-owned content (whether this is to train generative AI models or whether any third-party rights are infringed in the content created or recreated using generative AI), we understand from interviews that there is limited appetite amongst screen sector rightsholders to license or provide authorisations for their rights for AI use (including training). AI has been described by some as a “black box” with very little knowledge amongst sector stakeholders of how to navigate rights transfer and related commercial questions, such as compensation.

From our interviews, we understand that on the rightsholders’ side, there is currently limited knowledge about which rights or content are being used for training, whereas AI companies and tech companies attribute difficulties in the AI model mechanism in accurately identifying rightsholders and then licensing this content. Combined, this has meant that there is little licensing of screen content for AI training in the UK. It has been suggested by some stakeholders in our interviews that for licensing of third-party screen content for AI training in the UK to progress, transparency around which third-party content is being used for AI training, and clarity on how to identify these rightsholders, are needed as a crucial first step.

²⁶ BFI and CoSTAR Foresight Lab. 2025. ‘AI in the Screen Sector: Perspectives and Paths Forward A Foresight Lab Report’. June 2025. See [here](#).

2. Frameworks and codes of practice

The focus of this chapter is the various codes of practice that currently exist in the screen sector and how they attempt to navigate the various copyright and ethical issues described in Chapter 1.

A ‘code of practice’ is a formally written set of guidelines or rules that describe how persons or organisations should act, in particular circumstances, to achieve required standards. It is usually issued under or alongside legislation to help interpret, implement, or comply with legal duties. Codes of practice are often voluntary in nature and include a range of guidelines, frameworks, and principles that can clarify and enable transactions and work within the sector. Such codes of practice are often established and enacted by representative bodies, unions, guilds, and sometimes imposed by companies attempting to regulate internal use of AI. For example, by being a member of a professional creative body, the member agrees to adhere to the body's codes of practice.

In the absence of enacted law on key questions regarding the licensing of copyright-protected works and on ensuring compliance with ethical and/or labour-related considerations, codes of practice enable the sector to navigate commercial relationships and transactions involving the use of AI. In doing so, codes of practice provide solutions for the legal and regulatory considerations described in the previous chapter. In the table below, we have provided a high-level summary of some existing codes of practice applicable to the use of AI within the screen sector.

Table 1. Summary of AI codes of practice within the UK screen sector

Name of framework	Type	Status	Use case
CoSTAR Time to ACCCT Framework	Framework	Published; unclear as to extent and scope of use	Supports contracting between developers of generative AI and screen sector rightsholders. Contracts entered into under this framework would enable the authorised use of copyright-protected material in the development of generative AI models (the framework includes detailed guidance on sustainable compensation and value generation). Sectors: all screen sectors, where rightsholders’ content is used for generative AI training.
DAACI Attribution Framework	Framework	Published; unclear as to scope and extent of use	Supports fairer transactions between rightsholders in music and users of DAACI AI music tool. Ethical framework that supports the authorised use of copyright-protected music (including ensuring fair remuneration) in the creation of AI-generated music developed using DAACI technology. Sectors: music, all screen sectors using DAACI AI software.

Producers Alliance for Cinema and Television (Pact) AI guidance and Key Principles ²⁷	Principles	Published; in use	Enables collective bargaining agreements between Pact's producer members and other sector stakeholders. Governs the use of generative AI within the lifecycle of screen production. ²⁸ Sectors: film and television.
Equity AI toolkit	Guidance and resources	Published; in use	Supports fairer and ethically compliant collective bargaining agreements between Equity members ²⁹ and producers. Supports actors and performers in ensuring that the use of their likeness, voice, and personal data in screen production is ethical, transparent, and based on informed consent, with an opportunity for fair and proportionate remuneration. Sectors: film, television, video games, animation.
International Federation of Actors' (IFA) Guide to Artificial Intelligence	Guidance	Published; in use	Supports fairer, ethically compliant contracts between actors and producers. Clarifies IFA's position on key ethical considerations relating to the use of AI in the screen sector, impacting its actor members. Clarifies position on AI-related contract provisions in collective bargaining agreements, such as consent, compensation, and protection against misuse. Sectors: film, television, video games, animation.
AIMICI (AI for Media Industries & Creative Individuals) Transparency Framework	Framework	In development	Supports transparent use of AI in screen production. The framework aims to link AI transparency compliance to funding requirements. The terms of this framework have not been made available for review. Sectors: unclear at present.
Copyright Licensing Authority's Generative AI License	License	In development	Aims to enable collective licensing of copyright-protected written works (including scripts) by AI developers. The terms of this licence are currently not publicly available for review. Sectors: unclear at present.

²⁷ The full text of Pact principles is a members' resource and not publicly available.

²⁸ Pact is also currently advocating for a balanced regulatory environment that underpins a commercial ecosystem where rightsholders are fairly remunerated for the use of their content to train Gen AI models.

²⁹ Equity represents UK screen sector cast and crew, such as actors, stage management, stunt performers, TV presenters, and voice artists.

Netflix guidance for use of Generative AI in Content Production	Principles	Published; in use	Supports transparent, ethical, and copyright-compliant use of generative AI in content production for Netflix These guidelines set out Netflix’s protocols for the use of generative AI by production partners in the creation of content for Netflix,³⁰ including the use of third-party-owned content or personal data in training or inputting into generative AI.³¹ The guidelines advise on ensuring content created using generative AI does not infringe third-party copyright³² and/or data without the necessary authorisations and clearances; and set down protocols for ensuring consent and agreements with guilds and unions are finalised before AI is used in a way that impacts performers’ likeness and personal features, and/or replaces their work in production. Sectors: all screen sectors, where content is created for Netflix.
---	------------	-------------------	--

³⁰ The use of Generative AI in creating intermediary outputs, e.g., storyboarding, etc., is typically exempt from detailed protocols.

³¹ These protocols primarily encourage transparency and disclosure of AI use and require Netflix’s written consent and authorisation before such use is permitted.

³² The guidance also explicitly cautions against inputting Netflix-owned content into AI models.

3. Assessment framework

The table below summarises the key aspects of two key codes of practice analysed as part of this research: the CoSTAR Time to ACCCT framework and DAACI's Attribution framework. These have been analysed in depth, given their detailed provisions on how third-party content can be used for AI training and/or outputs, and their comprehensive solutions for key commercial considerations for licensing as outlined in Chapter 1. The assessment framework that has been developed for this research creates a blueprint of key terms relevant to the use of third-party-owned content commercially – either for AI training and/or in outputs. This can be used to aid analysis of future codes of practice relevant to the sector.

Assessment criteria cover key commercial and ethical considerations that are relevant to this research, including:

- **Scope of AI use:** We have outlined the scope of AI use envisaged in each case, e.g., AI model training.
- **Jurisdiction:** This primarily refers to the territory in which these frameworks or codes of practice operate. In practice, given the non-binding nature of most codes of practice, this can refer to the legal jurisdiction of any transactions finalised under these frameworks or activities undertaken in a particular legal jurisdiction guided by these codes of practice.
- **Copyright and/or ethical considerations:** We have explored which specific copyright and/or ethical issues (of the list discussed above) have been addressed by way of these frameworks.
- **Screen sector stakeholders impacted:** We have mapped these frameworks and their applicability to specific screen sector stakeholders and rightsholders (see Figure 1).
- **Remuneration:** We have outlined any relevant proposals in these frameworks provided in relation to how remuneration should be determined fairly and proportionately in AI-related transactions.
- **Governance:** We have detailed any provisions clarifying who the governing authority is in these cases, and any provisions detailing how compliance with guidelines or provisions should be overseen in these cases.

Table 2. Assessment framework

Name of framework	Jurisdiction	AI use envisaged	Copyright and/or ethical considerations	Screen sector stakeholders impacted	Remuneration	Governance
CoSTAR Time to ACCCT Framework	UK	AI model training and inference (and other related uses)	• Clear, informed, and explicit consent (including right to withhold consent) • Rights holders' control on usage terms • Transparency of use that clarifies end use, including possibilities for use post-AI training	• Rights holders, including producers, screenwriters, networks, and distributors in the screen sector • Users including AI developers and third-party users	• Sets out mechanisms for fair, practical (reflecting actual value), and scalable models of compensation from AI developers (and users) to rights holders (including direct and cascading rights) • Recognises compensation models fit for various AI asset and model types	• Collaborative governance model combining technology, best practice principles, and Government-backed support
DAACI Attribution Framework	UK	AI-generated music using DAACI's AI system	• Clear and explicit consent ('opt-in' consent) • Fair licensing of copyright-protected works • Transparency of use • Clear attribution of works	• Rights holders of music, including composers, publishers, labels involved in music creation • Screen sector creatives who are also users of DAACI generative AI tool	• Sets out principles for fair remuneration through licensing and royalty distribution, which is based on clear attribution for protected material used	• Envisages an Independent AI and Creative Industries Advisory Board for governance oversight

4. Emerging developments from other jurisdictions

The following table provides a high-level snapshot of the current policy and regulatory landscape relating to the governance of AI and its interplay with copyright and ethics in select international jurisdictions. In the vast majority of cases, there is no explicit policy, law, or regulation targeted to the use of AI within the screen sector. The snapshot below contains a summary of each country's overall position and relevant regulatory context.

Table 3. Snapshot of the AI policy landscape in other jurisdictions

Jurisdiction	Stage	Regulatory context
European Union	Legislation in place	The EU's Artificial Intelligence Act (AI Act) was enacted in August 2024 and is in its implementation phase. The Act includes obligations for Big-tech companies, including Google, Microsoft, and OpenAI, to align with copyright standards. There are strong sanctions and various levels of penalties in place for companies, to deter them from prohibited AI practices under the Act. The Act is accompanied by guidelines for General Purpose AI (GPAI) models, clarifying provisions of the AI Act, including the definition and scope, obligations and risk criteria, and notification duties for providers. An accompanying Code of Practice was also published, providing a framework for GPAI developers to meet the requirements of the EU AI Act.
Ireland	Policy development stage	Besides the EU AI Act, there is no specific national regulation of AI in Ireland. However, an independent body called the Artificial Intelligence (AI) Advisory Council has been established to provide guidance to the Irish Government on emerging issues in AI.
Denmark	Legislation in place, amidst various policy developments	Besides the EU AI Act, three pieces of domestic legislation have been enacted to regulate AI. The first is on supplementary provisions on the regulation of AI and implements specific provisions of the EU AI Act, primarily concerning governance, including supervisory authorities and sanctions for non-compliance. The second piece of legislation, an Act amending the SU Act, regulates the use of AI in state education, and the third is an Act amending the Danish Working Environment Act, thereby regulating the use of AI by the Danish Working Environment Authority (Denmark's supervisory authority overseeing compliance with working environment regulation). Separately, the Danish Government has also reportedly proposed new legislation providing Danish citizens with rights against the unauthorised use of their own body, facial features, and voice, which is aimed at regulating the making of deepfakes without consent (with some exceptions).

United States	Policy development stage, with some codes of practice	There is no single federal law that regulates AI development or specifically bans or limits its use. AI developers and users comply with an inconsistent mix of state and local rules, making compliance complex. The US AI Action Plan, developed by the current administration, prioritises innovation by not imposing strict mandates on companies regarding the use of AI. Importantly, the Writers Guild of America and SAG-AFTRA were the first screen sector unions internationally to incorporate terms in their respective collective bargaining agreements relating to the use of AI by producers and their impacts on screenwriters and actors. Terms included protections against unauthorised use of actors' likenesses and protections against the use of AI to write scripts or generate source material.
Australia	Policy development stage, with some codes of practice	The Australian Government has issued guidance on AI adoption and governance, but no specific statutes or regulations explicitly regulating the use of AI currently exist. Notably, the Australian Government has confirmed that it will not introduce a text and data mining exception for AI use, and is consulting with the Copyright and Artificial Intelligence Reference Group (CAIRG) to explore three priority issues on copyright and AI policy, including the examination of licensing arrangements for the use of AI, improved certainty on applying copyright law to AI-generated material, and exploring avenues of less costly enforcement in relation to AI outputs-related infringement. As per the latest updates, written feedback is currently being sought from CAIRG members on these priority areas.
Japan	Legislation in place	Japan's AI Promotion Act establishes foundation principles for policies that promote the research, development, and utilisation of AI. The focus is on promoting economic development through the use of AI; the Act imposes no penalties on parties and enables the Government to advise businesses on harmful AI use, guide corrective actions, and disclose identified malicious actors.
South Korea	Legislation in place	The AI Framework Act (effective January 2026) is reported as being the second most comprehensive regulatory legislation on AI after the EU AI act. The emphasis is on transparency of use in AI-generated outputs, whilst promoting the use of AI. The Act grants regulatory authority to the country's Ministry of Science and Information and Communication Technology, with the power to impose fines.

5. Conclusion

An objective of this research was to enable the screen sector to make decisions about next steps on the use of AI within the sector. This research finds that the regulatory environment on AI, including policy developments on copyright, is currently still in early stages. This makes it challenging to suggest clear next steps and/or concrete recommendations for the screen sector. However, we are able to outline the current status quo on commercial transactions taking place within the screen sector in relation to AI, and identify the gaps that need to be bridged or unlocked for transactions to progress. This mapping of the status quo and identification of key gaps form the main concluding findings of this report.

An important caveat is that there is currently limited evidence and publicly available information on the scope and extent of transactions being finalised within the sector in relation to AI, across the legal and ethical issues considered in this report. Therefore, what follows is based on our best understanding of the commercial landscape, underpinned by a review of secondary sources and anonymised findings from interviews with sector rightsholders and technology companies.

Licensing of third-party-owned screen content for generative AI training

There is little licensing of third-party-owned screen content for generative AI training

We understand that there is currently little licensing of third-party-owned screen content for AI training in the UK. We understand that the AI model data scraping mechanism is known to make it technically challenging to identify:

- What third-party rights-owned content is currently being used in the context of AI training
- How to identify and attribute rightsholders of the various third-party-owned content being used for AI training and in AI-generated outputs.

Further, and likely as a result of the above, we understand that sector stakeholders have a limited appetite for the licensing of copyright for AI training, with there being general scepticism around licensing any rights for AI training. Due to the technical challenge in identifying rightsholders, AI has been described by some as a “black box” with very little knowledge amongst sector stakeholders of how to navigate rights transfer and related commercial questions, such as compensation.

For licensing to progress, key technical and commercial solutions are needed

We understand from interviews that, for the UK AI training licensing landscape to see advancement – i.e., for licensing of third-party screen content for AI training in the UK to progress – transparency around the third-party content being used for training, and clarity on how to identify these rightsholders, are needed as a crucial first step. It has been suggested that these are, first and foremost, technical questions that need to be answered at the level of how the AI training mechanism works, before the law can follow.

Other related commercial and regulatory solutions are needed, such as workable approaches to the distribution and management of related compensation and royalties to relevant rightsholders.³³ In this regard, some stakeholders have suggested implementing royalty distribution mechanisms similar to those used by collection management societies such as the PRS for music; however, limited clarity on identifying relevant rightsholders makes this challenging. A similar system of royalty distribution was proposed by the Copyright Licensing Authority and PLS for literary works (which include scripts), but

³³ Royalties are different from one-time license fees, in that the former is the term typically used for continued exploitation of rights.

the terms of these licenses are not publicly available, and there is no visibility on the extent to which these are currently being used in practice.

We understand, anecdotally, that limited licensing for third-party screen content has also meant that little AI training is taking place within the UK – which may be supportive of AI developers' view that innovation in the UK through AI development is facing hurdles (see previous chapters). In our interviews, it was also suggested that differences in fair use provisions between the US and UK makes it possible for AI training to scrape third-party data for training in the US (where this is permitted if the use is transformative³⁴), as opposed to the UK (which, as the previous chapters show, only permit training for non-commercial, research purposes). Some tech companies are training AI models based on in-house IP, without the need for any licensing of third-party-owned intellectual property, though this is rare.

Use of generative AI to create or enhance screen or audiovisual outputs

Generative AI is being used within the screen sector to create or enhance audiovisual outputs that use third-party content and personal data

Separate from the use of third-party content in AI training, screen sector stakeholders use generative AI in the production lifecycle to create or enhance audiovisual outputs, e.g., using AI post-production and/or using AI to recreate scenes in a film or replace human involvement, including on-screen talent and crew. As shown in previous chapters, any use of generative AI-made outputs that exploit third-party personal data, characteristics, likeness, and/or third-party-owned creative outputs requires the necessary authorisations, clearances, and other protocols from relevant rightsholders.

Authorisations and contracts are required for rightsholders' consent and to satisfy other commercial terms

These are contractual considerations, with the need for users of third-party content (in the screen sector, these are typically producers, networks, studios, or streamers) to get the relevant clearances, authorisations, and contracts to ensure any use and/or exploitation of third-party rights, personal data, and/or personal characteristics is authorised. We understand from our review of secondary sources and anecdotally from interviews that such use is taking place, and related contracts, authorisations, and clearances are also being finalised in the sector. However, there is no empirical evidence as to the scope and extent of authorised use versus unauthorised use in this regard.

Existing sector codes of practice provide protocols to navigate relevant contractual terms

Various codes of practice have been developed, as detailed in previous chapters, to raise awareness of the various ethical, legal, and/or contractual issues at play, including best practice that should be followed in this regard. These codes of practice enable sector stakeholders who use generative AI to create or enhance audiovisual outputs to review, and update where necessary, protocols, documentation, and clearances to ensure any such use or exploitation of third-party copyright, personal data, characteristics, and/or likeness is authorised and meets the applicable ethical standards and applicable law (including the Copyright, Designs and Patents Act 1988, where outputs infringe third-party material, and relevant data protection laws). Key codes of practice that highlight best practice on this topic include Netflix's AI guidelines (which apply to Netflix production partners) and Equity's AI toolkit, including Equity's AI vision statement, which sets out the eight principles for the industry to follow when engaging Equity-represented artists for performance cloning.

³⁴ Skadden, May 2025. See [here](#).

6. References

- BBC. 2025. 'Guidance: The use of Artificial Intelligence'. 24 June 2025. <https://www.bbc.co.uk/editorialguidelines/guidance/use-of-artificial-intelligence#seekingguidance>
- CoSTAR Foresight Lab. 2025. 'AI in the Screen Sector: Perspectives and Paths Forward A Foresight Lab Report'. June 2025. <https://www.bfi.org.uk/industry-data-insights/reports/ai-screen-sector-perspectives-paths-forward>
- CoSTAR National Lab, DECADE and Sheridans. 2025. 'Time to ACCCT: Providing Creative Industries and AI Developers with a Copyright Framework of Access, Control, Consent, Compensation and Transparency'. May 2025. <https://decade.ac.uk/wp-content/uploads/2025/05/costar-national-lab-ai-copyright-framework-report-may-2025-1.pdf>
- DAACI. 2025. 'A Framework for Copyright and Creative Innovation: Ethical and Legal Framework for Generative Music Creation'. March 2025. <https://daaci.com/wp-content/uploads/2025/03/DAACI-WHITE-PAPER-ETHICAL-LEGAL-FRAMEWORK-FOR-GENERATIVE-MUSIC-CREATION-26th-March-2025.pdf>
- D Phillips, D Brice, E Phillips, D Lydon, JR Chang. 2024. 'AI screen skills study'. *Queen's University Belfast*. https://pureadmin.qub.ac.uk/ws/portalfiles/portal/640931943/AI_Screen_Skills_Study.pdf
- Equity. 2025a. 'Scotrail voice clone is "exploitative" behaviour, says Equity'. 28 May 2025. <https://www.equity.org.uk/news/2025/scotrail-voice-clone-is-exploitative-behaviour-says-equity>
- Equity. 2025b. 'TUC backs Equity's call for better protections of performers from AI exploitation'. 9 September 2025. <https://www.equity.org.uk/news/2025/tuc-backs-equity-s-call-for-better-protections-of-performers-from-ai-exploitation>
- Glenster, Hampton, Neff, and Thomas. 2025. 'Policy Brief: AI, COPYRIGHT, AND PRODUCTIVITY IN THE CREATIVE INDUSTRIES'. February 2025. <https://www.bennettschool.cam.ac.uk/wp-content/uploads/2025/02/AICopyrightProductivityCreativeIndustries.pdf>
- International Federation of Actors. 2025. 'FIA Guide to Artificial Intelligence'. 2025. https://fia-actors.com/wp-content/uploads/2025/03/FIA_Guide_AI_rev2025_EN.pdf
- KPMG. 2023. 'Generative AI and the UK labour market'. June 2023. <https://assets.kpmg.com/content/dam/kpmgsites/uk/pdf/2023/06/generative-ai-and-the-uk-labour-market.pdf>
- Megaphone. 2025. 'Open Letter to PACT: We Demand Better in AI for Film & TV!' <https://www.megaphone.org.uk/petitions/open-letter-to-pact-we-demand-better-in-ai-for-film-tv>
- Skadden, May 2025. <https://www.skadden.com/insights/publications/2025/05/copyright-office-report>
- Trades Union Congress. 2025. 'AI for Creative Workers: A TUC Manifesto'. March 2025. https://www.tuc.org.uk/sites/default/files/2025-02/AI_Manifesto_Creative_Workers_2025_AW.pdf
- YouGov. 2025. 'Trust or trepidation: Attitudes to AI in media'. 27 February 2025. <https://yougov.com/reports/51673-uk-media-attitudes-to-ai-report>