

AI Regulation

Status: Maintained | Jurisdiction: United Kingdom

Jurisdiction	Source Information	Is there dedicated legislation regulating AI?	Are there plans for dedicated legislation regulating AI?	Are specific applications of AI banned?	Does legislation categorize different types of AI or use cases for AI?	Are there requirements for an AI system to log activity automatically?	Are there information or transparency requirements?	Are there explainability requirements?	Are there any ethical requirements for human oversight?	Is there government guidance or a code of practice on AI development and use?	Is there guidance or a code of practice on AI for specific sectors?	What general purpose legislation is most relevant to AI development and use?	What technical standards, whether international or local, are relevant to AI development and use?	Is there legislation governing AI liability?	Are there ongoing monitoring requirements after a product incorporating AI goes live?	Are there any notable disputes, cases, or litigation concerning AI?	Are there any other key points that practitioners should consider?
United Kingdom	<p>Law stated as at 1 December 2025 (Simon Bollans, Alison Lewinsky, and Mark Aggleson, Stephen Harwood)</p> <p>The UK currently does not have any single, comprehensive, dedicated legislation that specifically regulates AI. In March 2023, the previous UK government adopted a principles-based regulatory framework that was intended to be flexible and adaptive to the evolving nature of AI technology. Details of this approach are in the previous government's policy paper and consultation responses, which outline a pro-innovation approach to AI regulation and set out principles for sector-specific regulatory guidance (see Practice Note, AI UK regulatory developments).</p> <p>It is still unclear to what extent the current UK government (formed in July 2024) will follow the general principles of this approach. However, the authors anticipate the implementation of some dedicated AI legislation over the next few years, even if it only targets the largest and most powerful AI models or applies in specific contexts.</p>	<p>Yes, King's Speech proposal</p>	<p>There are currently no specific applications of AI that are banned in the UK in the same way that the EU AI Act (Regulation (EU) 2024/1689) banned prohibited AI practices.</p> <p>However, in some cases, developing, marketing, distributing, and using AI may contravene existing laws and regulations that are not tailored to AI. AI developers and users must factor in existing laws and regulations, such as those relating to data protection, employment, equality and anti-discrimination, and anti-competitive practices, when developing and using AI. They should also focus on AI systems or applications that pose significant ethical, privacy, or safety concerns.</p> <p>In December 2024, the current government launched a public consultation Copyright and Artificial Intelligence: (AI Copyright Consultation) to seek views on how the government can ensure that the UK's legal framework for AI and copyright supports the UK creative industries and the AI sector (see Practice Note, AI and copyright: December 2024 consultation on copyright and AI). This consultation pertains to potential changes to UK copyright law to enable the use of copyright works to train AI models. The government's preference at the time was for allowing the use of proprietary content for text and data mining (TDM), subject to an "opt-out" exception for rights holders (that is, to enable the use of content for TDM where rights holders have not reserved their rights).</p> <p>Section 135 of the DUA requires the Secretary of State, within nine months beginning on 19 June 2025 (the date DUA passed into law), to publish and lay before Parliament an economic impact assessment on copyright holders and AI developers and users of the four policy options set out in section B4 of the AI Copyright Consultation (see Article, Data (Use and Access) Act 2025: the key changes ahead, AI and copyright). These policy options are:</p> <ul style="list-style-type: none"> Do nothing, so the copyright and related laws remain as they are. Strengthen copyright, requiring licensing in all cases. A broad data mining exception, allowing data mining on copyright works, including for AI training, without rights holders' consent. The exception would allow commercial use for any purpose and be subject to few or no restrictions. A data mining exception, which would allow rights holders to reserve their rights, underpinned by supporting measures on transparency, that is, the "opt-out" exception. <p>The government may also add alternative policy options to this economic impact assessment. 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However, depending on the application and sector, AI systems may need to log activities to comply with existing regulatory requirements, particularly (but not exhaustively) those related to:</p> <ul style="list-style-type: none"> Accountability. Data protection. Equality and anti-discrimination. Transparency. <p>Further, the previous UK government's approach to AI regulation emphasized the importance of transparency and accountability, suggesting that future regulatory guidance could address the need for logging and reviewing AI system activities to ensure ethical and responsible use. However, the current government, which was formed in July 2024, could take a different approach, which will emerge in due course.</p> <p>The above legislative requirements do not affect private contractual situations where, for example, an entity has committed to AI-related explainability requirements in a way that is legally enforceable by contract.</p>	<p>Existing UK laws contain information and transparency requirements for AI systems, in particular UK data protection law (Articles 22A to 22D, UK General Data Protection Regulation (UK GDPR)), as amended by the Data (Use and Access) Act 2025 (DUA), which in this context is expected to come into effect in the first part of 2026.</p> <p>In this regard, the impact of the DUA is as follows. When AI is used in automated decision-making (ADM) that results in a "significant decision" (one that produces a legal effect or similarly significant consequence for a data subject, such as in credit scoring or recruitment), individuals have the right to:</p> <ul style="list-style-type: none"> Be informed about ADM decisions. Make representations. Human intervention if requested by the individual. Contest the decision. <p>This is a significant move away from a regime that restricted the use of ADM, subject to exceptions, to a more permissive approach with safeguards. Tighter controls remain on ADM involving special category personal data, for example, data concerning health, political opinions, and religious beliefs (see Practice Note, Meaning of personal data (UK): Special categories of personal data). For more information, see Article, Data (Use and Access) Act 2025: the key changes ahead: Automated decision-making.</p> <p>The DUA also amends the Privacy and Electronic Communications Regulations 2003 (PECR), which regulate storage and access technologies used by providers of online services, including web or app developers. Such technologies include:</p> <ul style="list-style-type: none"> Cookies. Tracking pixels. Link decoration and navigational tracking. Web storage. Fingerprinting techniques. Scripts and tags. <p>AI is routinely deployed in these technologies. Therefore, the PECR will to that extent apply to AI-enabled storage and access technologies. The UK Information Commissioner's Office (ICO) has produced draft guidance to reflect the amendments that the DUA makes to the PECR (ICO Guidance). See Practice Note, Data (Use and Access) Act 2025: Part 5, Chapter 2 – Changes to PECR.</p> <p>The ICO Guidance states that those using storage and access technologies must, except for certain limited cases, provide clear and comprehensive information about them. However, if storage and access involve processing personal data, providers of online services must provide the following information anyway:</p> <ul style="list-style-type: none"> The storage and access technologies to be used. The purposes for which online service providers intend to use them. Any third parties who store or access information in the user's device, or process information stored in, or accessed from, the user's device, including the purposes they will be used for. The duration for which any information will be stored or access to information granted, such as the duration of cookies. <p>The above are, in effect, transparency and information requirements relating to the use of AI in the context of storage and access technologies. For further implications and effects of the DUA, see Practice Note, Data (Use and Access) Act 2025. Practitioners working in the public sector should be aware of the Algorithmic Transparency Reporting Standard (ATRS), which encourages public bodies to publish voluntarily information on their use of AI. The government has stated that compliance with the ATRS is mandatory for all government departments. See Practice Note, Transparency AI use in the public sector (UK): Government guidance and standards on AI transparency.</p> <p>The previous UK government's approach to regulating AI in its policy paper also highlighted transparency and explainability as key principles in a proposed AI regulatory framework. However, the current government, which was formed in July 2024, could take a different approach, which will emerge in due course.</p>	<p>While there are currently no AI-specific ethical requirements for human oversight under UK data protection law, the UK Equality Act 2010 also serves to protect people from discrimination in the workplace and in wider society. See Practice Note, AI UK regulatory developments: Equality and Human Rights Commission (EHRC).</p> <p>Further, ethical considerations, including human oversight, were also integral to the previous government's approach to AI regulation. The previous government's AI policy paper outlined principles such as accountability and governance, which implied that there may be future ethical requirements for human oversight in the development and deployment of AI systems. These principles are intended to ensure that AI operates within a framework that respects human rights and ethical standards.</p> <p>However, the current government, which was formed in July 2024, could take a different approach, which will emerge in due course.</p> <p>The Information Commissioner's Office has also published detailed guidelines on AI and data protection. Following the enactment of the Data (Use and Access) Act 2025 (DUA), these guidelines are under review and will change. These include best practices for ensuring AI systems comply with the UK General Data Protection Regulation (UK GDPR), such as conducting Data Protection Impact Assessments (DPIAs) for AI projects. For more information, see Practice Note, Data (Use and Access) Act 2025: Part 5, Chapter 1: Data Protection.</p> <p>The previous UK government, in partnership with the Alan Turing Institute, had also launched the AI Standards Hub which promotes the development of global standards for AI. This currently serves as a resource for organizations to align with best practices in AI ethics, safety, and transparency. The current government could continue this initiative.</p>	<p>The previous UK government provided high-level guidance on AI development and use through its AI policy paper, which set out a pro-innovation regulatory framework based on principles that sectoral regulators would consider. This guidance is not legally binding but serves as a roadmap for the development of sector-specific regulatory guidance. See Practice Note, AI UK regulatory developments: Competition and Markets Authority (CMA).</p> <p>The previous government also announced that it was developing a roadmap for AI regulation, which would include further principles and guidance for AI development and use. However, the current government, which was formed in July 2024, could take a different approach, which will emerge in due course.</p> <p>In addition, the previous UK government's Data Ethics Framework offers guidance on how to use data ethically in AI systems within the public sector. The framework includes, among other things, fairness, accountability, and transparency, which are crucial to AI development and deployment. This administrative guidance, last updated on 16 September 2020, continues under the current government.</p> <p>The Information Commissioner's Office has also published detailed guidelines on AI and data protection. Following the enactment of the Data (Use and Access) Act 2025 (DUA), these guidelines are under review and will change. These include best practices for ensuring AI systems comply with the UK General Data Protection Regulation (UK GDPR), such as conducting Data Protection Impact Assessments (DPIAs) for AI projects. For more information, see Practice Note, Data (Use and Access) Act 2025: Part 5, Chapter 1: Data Protection.</p> <p>The previous UK government, in partnership with the Alan Turing Institute, had also launched the AI Standards Hub which promotes the development of global standards for AI. This currently serves as a resource for organizations to align with best practices in AI ethics, safety, and transparency. The current government could continue this initiative.</p>	<p>Under the former government's approach to regulating AI, there was an expectation that sector-specific regulators in the UK would develop regulatory guidelines for AI based on the principles outlined in an AI policy paper. These guidelines would be tailored to the unique risks and opportunities AI presents in different sectors (see Practice Note, AI UK regulatory developments). The former government's approach aimed to ensure that AI regulation was coherent across various sectors while allowing for the flexibility needed to address sector-specific concerns. However, the current government, which was formed in July 2024, could take a different approach, which will emerge in due course.</p> <p>Key examples of current sector-specific AI guidance and codes of practice include:</p> <ul style="list-style-type: none"> Healthcare. The National Health Service (NHS) has issued a Code of Conduct for Data-Driven Health and Care Technology, which outlines principles for the ethical use of AI in healthcare. It covers areas such as patient safety, data privacy, and transparency. It aims to ensure AI technologies improve care without compromising ethical standards. Financial services. The Financial Conduct Authority (FCA), along with the other UK financial sector regulators (the Prudential Regulation Authority (PRA) and the Bank of England), have published various papers and guidance on AI use in financial services, such as: <ul style="list-style-type: none"> The FCA's AI Update (see Legal Update, FCA responds to government's response to results of AI white paper consultation); The Bank of England's FS2/23 – Artificial Intelligence and Machine Learning; and The Bank and the PRA's response to DS17/HMT: update on our approach to AI (see Practice Note, AI UK regulatory developments: Bank of England). The FCA's guidance includes the application of AI in areas like credit scoring and fraud detection. The focus is on maintaining fairness, accountability, and transparency, particularly in automated decision-making. The guidance applies existing controls and requirements, such as those in the FCA Handbook, within an AI context. <p>• Law enforcement. The National Policing Digital Strategy 2025–2030 outlines the role of AI in modern policing, including the use of data analytics and predictive policing tools. It stresses the need for ethical standards, accountability, and public trust in AI-driven technologies. The College of Policing has published an authorised professional practice for data ethics and data-driven technologies in policing (see College of Policing, Data ethics: Authorised Professional Practice).</p> <ul style="list-style-type: none"> Equality and human rights. The Equality and Human Rights Commission (EHRC) has published its approach to regulating AI in an update on our approach to regulating artificial intelligence (30 April 2024) (see Practice Note, AI UK regulatory developments: Equality and Human Rights Commission (EHRC)). Education. The Department for Education has released guidelines on the use of generative AI in schools and higher education. These guidelines focus on ensuring that AI tools enhance learning without infringing on student privacy or autonomy. They emphasize transparency in AI applications like adaptive learning systems and automated grading. Transport. The Department for Transport provides guidance on AI in autonomous vehicles. The Code of Practice for Automated Vehicle Trialling outlines: <ul style="list-style-type: none"> safety standards; the importance of human oversight; and the need for transparency in data collection and use during trials of self-driving cars. <p>• Energy. Ofgem, the UK energy regulator, has issued guidelines on the use of AI in energy markets (see Practice Note, AI UK regulatory developments: Office of Gas and Electricity Markets (Ofgem)). This includes using AI for grid management, demand forecasting, and smart meters. The focus is on ensuring that AI applications: <ul style="list-style-type: none"> are transparent; are secure; and do not lead to unfair market practices. </p> <p>• Retail and consumer protection. The Competition and Markets Authority (CMA) has explored the implications of AI in retail, particularly concerning pricing algorithms and personalized marketing. The guidance emphasizes the need to prevent AI-driven practices that could harm consumer rights, such as unfair pricing or deceptive advertising (see Practice Note, AI UK regulatory developments: Competition and Markets Authority (CMA)).</p>	<p>Range of subject matter</p>	<p>Several ISO/IEC and IEEE</p>	<p>No specific legislation</p>	<p>Not specifically</p>	<p>Getty, Thaler, others</p>	<p>Political landscape, ethics</p>