



# **RESPONSIBLE AI IN PRACTICE: THE JOURNEY OF ARTS COUNCIL ENGLAND**

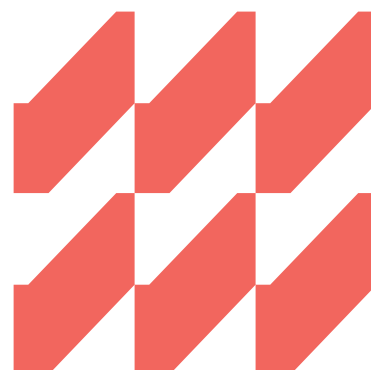
Written by Dr Oonagh Murphy and the New Technologies and Innovation Team

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# RESPONSIBLE AI IN PRACTICE:

## THE JOURNEY OF ARTS COUNCIL ENGLAND

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### Who is Arts Council England?

Arts Council England is the national development agency for creativity and culture in England. We have around 700 staff, based in nine offices across England. We invest public money from the government and the National Lottery to support the arts and culture sector. Our ambition, as set out in our strategy Let's Create, is to ensure that everyone in England has access to high-quality cultural experiences in the places where they live and work, and that the creativity of all individuals is valued and nurtured.

### Why does Responsible AI matter to Arts Council England?

There is a broad and growing awareness of the potential impact of Artificial Intelligence (AI) on all aspects of creative and operational practice in the arts and culture sector. Recognising that these technologies will impact our own operational practices too, Arts Council England has begun to develop internal policies and practices that support responsible engagement with AI. To fulfil our role as the national development agency for the creative and cultural sector we knew that we needed to create a solid foundation for responsible engagement with AI technologies.' Now, 12 months into our journey, we are keen to share our learnings with others who may be beginning to develop an AI strategy or policies.



## Defining the 'AI Project'

In May 2024 Arts Council England's Executive Board approved three R&D work packages that responded to emerging challenges facing the Arts Council and the wider creative and cultural Sector in the context of AI technologies. These were identified as:

1. How Arts Council England uses AI responsibly for internal purposes
2. How Arts Council England can help the sector navigate the opportunities and challenges of AI responsibly
3. How Arts Council England can contribute to UK AI policy development

This report shares our learnings from work package 1: How Arts Council England uses AI responsibly for internal purposes. We are sharing our approach both in order to be transparent (a cornerstone of the AI Policy which Arts Council England has now adopted), and to support peer organisations, many of whom were generous with their own support to us in developing our approach, as they begin their own AI journeys.

## Where does AI sit within Arts Council England?

The development of AI policy and practices at Arts Council England sits with the Executive Director of Enterprise and Innovation. Enterprise and Innovation - E&I, for short - comprises New Technologies & Innovation, Inclusive R&D, Business Innovation, Alternative Finance, Philanthropy, Environmental Responsibility, and Creative Health. As a team, we think of ourselves as the group looking at the most significant issues society faces – disruptive technologies, climate change, our evolving understanding of health and wellbeing – and supporting the sector to respond to the opportunities and challenges these issues present in a manner that promotes financial sustainability and growth.

Specifically, the 'AI Project' is led internally by Owen Hopkin, the Director of New Technologies and Innovation (NT&I), and externally by Dr Oonagh Murphy, the Responsible AI Fellow. The Responsible AI Fellow is a dedicated 18-month academic post that is funded by the Arts and Humanities Research Council through BRAID (Bridging Responsible AI Divides). The work is further supported by existing staff in the NT&I Team.

Our work in this area presents a development opportunity for the whole organisation, and we have sought to involve other members of staff as appropriate. Reflecting the guiding objective to identify and promote ethical and responsible AI practice, we will continue to consult with colleagues from the Governance, Diversity and Environmental Responsibility teams through their involvement in the advisory and working groups that are helping us to deliver the AI work plan.



## How Arts Council England uses AI: A Baseline Study

When we began this work in May 2024, Arts Council England had not taken a position on the use of AI technologies by staff to support their work.

In order to collect data and develop insights on views and practices around AI across Arts Council England, a survey was distributed to all staff. The survey ran between July 8th - August 12th, 2024. The survey sought to reveal the sentiments, experience, skills and knowledge that exist within Arts Council England, and to identify what mechanisms would support staff to engage in AI technologies in a responsible manner.

The survey was distributed in the all-staff newsletter, and was supported by an internal communications campaign, which included a blog post on the staff Intranet, the launch of a new AI at Arts Council England project page on the Intranet, and a reminder in the staff newsletter in the last week of the survey being opened. The survey was completed by 254 of ACE's 700 staff, giving a completion rate of 36%.

The survey collected both quantitative and qualitative responses. The quantitative data provides a benchmark, which will enable future replication, allowing us to monitor progress and confidence around AI at Arts Council England. The qualitative data surfaced existing skills, knowledge and experience from across the geographically distributed Arts Council England team. Open response questions gave opportunities for the diverse staff base to provide insights and perspectives that may not have been on the radar of the New Technologies & Innovation Team.

## Headline Figures

- Sentiment: 55% of staff felt positive about the potential of AI, 22% negative.
- AI Usage: 42% of respondents were using AI tools in their work (110 staff members).
- Interest: 80% of staff wanted to learn more about AI.
- Training: Only 20% had engaged in AI training.
- Queries: 30% had received questions from the sector around the use of AI.
- Staff report feeling ill-equipped to answer questions from the sector about the ethical and practical implications of these technologies. Only 2% of staff report feeling very confident answering questions.
- Staff are also unclear about how and when it is appropriate to use AI in the course of their everyday work at Arts Council England.

The survey showed us that there was a pressing demand for sector-facing and staff-facing guidance from Arts Council England on the adoption and impact of AI technologies. This empowered us to build policy around existing practices and challenges, as well as providing a mechanism for staff to influence and shape the direction of Arts Council England's position on the use of AI technologies. Whilst not the reason it was carried out, in hindsight the survey was an excellent mechanism of communicating with staff and beginning an organisation-wide conversation around AI technologies. The data from the survey evidenced a need for policy in this area from a legal compliance and reputational risk perspective. Staff were already using AI technologies: the survey made it clear that, rather than AI being a near-future technology, it is a technology that has already arrived.

“

**We just need a clear position from Arts Council England - even if it is that we are doing some research and thinking in this area to ensure we carefully consider any changes or policies that will impact the sector or public - we just need to let the sector know we are doing something.**

”

Staff  
Survey

## Responsible AI Adoption Strategy

From this baseline study we established a Responsible AI Adoption Strategy, which included the following objectives:

- Establish a governance structure to oversee AI policy implementation
- Develop internal AI policy for staff use of AI
- Track software licences: keep a record of licences that have been bought
- Create a public position statement on the use of AI in grant making processes
- Pilot programs: explore AI implementation in an organisation specific context

“

**We should outline how we want to explore using AI as part of the delivery of our strategy through the transformation programme and how we want to bring the sector together to talk about the impact of AI.**

”

Staff  
Survey

## Establish a governance structure to oversee AI policy implementation

The ultimate decision-making power around the adoption of an AI Policy sits with Executive Board. However, we know from experience that digital transformation requires consultation, active listening and co-production to ensure adoption is implemented across an organisation.

- » We wanted to get staff on board, from the very start of this project.
- » We wanted staff to know that this was a R&D process; we weren't pushing AI but were responding to expressed needs and concerns raised by staff themselves.
- » We wanted staff to know that the policy would address existing practices and speak to potential emerging practices while also speaking to the values of the organisation.
- » We wanted staff to know the approach we were taking was proactive rather than reactive.

To bring the organisation with us we established two new forums:

### The AI Oversight Group

- Chaired by Executive Director of Enterprise and Innovation
- Members were Directors who represented the organisation from a variety of operational perspectives (9 members).
- Meets quarterly until October 2025.
- Acts as a critical friend to work produced by the AI team.
- Identifies gaps and suggests ways to develop proposed policy and practice.
- Serves as a mechanism to refine work taken to Executive Board.

### Responsible AI Reference Group (working group)

- Chaired by Responsible AI Fellow.
- Members of staff from across Arts Council England, reflecting the full range of grades, location and directorates.
- Recruited to reflect diversity of perspectives on AI, from those excited by the opportunity, to those who are neutral, through to those that are vocally critical of these technologies\*
- Act as a community of practice.
- A hierarchy free space
- Sense check approach to AI at Arts Council England.
- Bring emerging questions and challenges to the group for discussion.
- Be a critical and curious space to exchange ideas, with invited external speakers from peer organisations to inspire and engage members.
- Bring voices from across the organisation into the conversation, and support operationalising and adoption of AI Policy by feeding the work of the group back to members' own teams and colleagues through informal knowledge sharing.
- Meet every two months from now until October 2025.

\*Some of those we asked to join this group were reluctant: they either didn't feel they had the skills or knowledge to contribute or felt strongly that AI was bad for people and planet. We did a lot of work engaging with these individuals to listen to their concerns, and to empower them



to realise their perspective was a valuable one that could help to shape the organisation's response to these technologies. We also discussed the motivation behind the wider AI Project – responding to the emerging use of AI technologies by staff at Arts Council England, rather than a project that sought to push AI technologies. We advocated the benefits of a proactive approach to policy development, to share a culture of Responsible AI, rather than waiting for 'something to happen' and needing to push through a reactive policy. We have sought to ensure that diverse voices are platformed in this meeting, by holding a 1 to 1 session with members in advance when useful, sharing links to articles and podcasts that link to areas of work or personal interest, and programming guest speakers and staff contributors to share their thinking. Our founding principle for this grouping was that a good meeting is one where everybody feels confident contributing. We framed these calls as being a hierarchy-free space, something that we felt was important in a grade-focused organisation. This allowed us to create a community of practice, and a space for honest conversations.

“

**The overview and  
progress-to-date were  
helpful and informative  
- it gave me confidence  
in discussing AI and the  
Arts Council's relationship  
with it.**

”

Staff  
Survey

“

**The Responsible  
AI Group meeting  
was fascinating  
and (probably more  
importantly) feels  
like a forum in  
which Arts Council  
England is really  
listening to staff.**

”

Responsible AI  
Reference Group

## Generative AI Policy: Using Generative AI Tools as an Arts Council England Employee (AI policy for staff)

The staff survey showed us that staff were already using AI technologies (primarily Generative AI), and that guidance was required to ensure that use of such technologies was legally compliant and aligned with the values of the organisation. We used the insights from the staff survey to define the scope of the AI guidance and then sought feedback on our first draft from the Responsible AI Reference Group.

The Reference Group provided 47 comments, recommendations and edits to the draft staff guidance 'Using Generative AI Tools as an Arts Council England Employee'. We discussed these comments with staff, and embedded changes based on their feedback. This ensured that the guidance spoke to staff with a range of job roles, and operating contexts. We then took the refined guidance document to the AI Oversight Group for discussion.

The Oversight Group provided a very strong steer that, owing to the live risks around legal compliance and reputational risk, the document should be 'policy' not 'guidance'; it should be the official position of how Arts Council Employees can use these technologies, rather than a softer advisory position. At this point we consulted with Union Representatives and sought feedback on the proposed policy. Again, this provided an inflection point, and further edits were implemented. The union felt strongly that the section of the policy which comments on environmental responsibility should be brought to the forefront - a position the AI Team were happy to support. The policy now reflects this.

We brought the policy to the Executive Board in February 2025. After a rigorous discussion, it was approved and adopted, and the team were tasked to move with haste, to support organisation-wide adoption of the policy.

The policy has two core themes:

### **1. Values-based practices.**

The AI policy is grounded in Arts Council England's corporate values – we care, we learn, we are ambitious - an important foundation which aligns the policy within the existing operating context at Arts Council England. Empowering individual staff and the organisation to apply existing knowledge and practice as a foundation for the responsible engagement with AI was a key strategic approach. As such the policy also aligns itself to the Nolan Principles of Public Life: Selflessness, integrity, objectivity, accountability, openness, honesty, and leadership, and UK GDPR.

We wanted to drive engagement and confidence, with the aim of creating a policy that would proactively support staff and help them recognise transferable skills, knowledge and practices that they can apply to their engagement with AI technologies.

There was nuance around use cases, for some the question of appropriateness was a legal judgement for others it was a values-based judgment. However, one area of operational practice - grant making processes - stood out as a value-based red line. Staff felt strongly that the work of assessment and decision making in grant making required expert skill and human

nuance and should at this time not be assisted by generative AI technologies. It was also the area which staff asked for the organisation to take a public position, as they were fielding questions from the sector regarding ACE's use of these technologies. They were also being asked by the sector if it was permissible for individuals or organisations to use Generative AI to write a grant application.

## 2. Legal compliance

The policy outlines how UK General Data Protection Regulation (UK GDPR) applies to the use of Generative AI Platforms. It is descriptive in outlining problematic use cases and directs staff to 'understand the terms of service before you input any GDPR-protected information into a generative AI tool'.

“

**The documents are  
really clear, thank you so  
much, I feel much more  
confident talking about  
AI now.**

”

Staff  
Survey

## Public Position Statement on AI in Grant Making Processes.

A Public Position Statement on AI in Grant Making Processes was developed with the Funding Programmes team. This short statement is the first public position that Arts Council England has offered about the use of AI technologies in any area of its work. It was decided that this first statement should be specific and focused, and that it would serve as a foundation for further statements and positions as they emerge. The statement provides clarity to applicants in the organisation's most significant area of work: the management and distribution of public funding in the arts and cultural sector. In brief, the statement says that Arts Council England does not currently use generative AI in the assessment, decision making, or outcome notifications of grant applications. It goes on to say that applicants can use Generative AI to support the drafting of their application, but provides some contextual and quality considerations for applicants to reflect upon. Crucially the statement notes that this is a position that may change as the technology changes, but that any change in position will be communicated publicly.

“

**...much of the work we do at  
ACE relies on the knowledge and  
specialist skills of individuals  
and I know many will think  
this is a weakness, I happen to  
think it's a great strength which  
enables collaboration and more  
importantly empathy.**

”

Staff  
Survey

“

**A public position statement may provide some confidence against fears of AI being used to judge applications especially at a time where success rates are historically low.**

”

Staff  
Survey  
Quotes



## AI Risk List

Whilst the policy is directive in terms of acceptable and non-acceptable use cases, we recognised that not all staff have the skills or knowledge to make assessments about the suitability of AI platforms and their compliance with UK GDPR. As such we created a risk list: an evolving document that provides analysis by the Data Governance Team on the appropriate use cases for each platform. The platforms on the initial version of the list are those that staff told us via the survey that they are already using.

Platforms are colour coded, green, amber, red. Analysis of the appropriate use of each tool is provided, alongside analysis of the platform's compliance with UK GDPR. This became known by the AI team as the 'we read the terms of service, so you don't have to' list.

The only tool currently green listed is Microsoft CoPilot. Arts Council England is a Microsoft organisation, and the enterprise licence which covers all staff ensures that all data used in any Microsoft Platform (when logged in through an Arts Council England staff account) remains within Arts Council England control, and is not used as training data.

All staff at Arts Council England have access to Microsoft CoPilot Chat, which comes as part of each person's Microsoft 365 account. CoPilot Pro was tested by a number of ACE staff as part of an AI Pilot. However, it was decided that its most useful feature – the minute-taking of Teams meetings – was more cost-efficiently accessed via the Teams add-on, Teams Pro. A further assessment of the advantages provided by CoPilot Pro will come in the wake of the organisation's 'Digital Workplace' initiative and its data storage/management exploration. ACE's Solutions Architect and a small number of ACE IT staff use CoPilot Studio for the purpose of AI pilot projects. Much of the benefit of CoPilot Studio – and CoPilot Pro – comes with having good quality, well-structured and well-managed data in an organisation. The AI Risk list is not exhaustive, and staff can use tools beyond this list; however in those cases, they need to make sure the tools are GDPR compliant, and in line with the staff policy. This provides flexibility to more technically minded staff.



## Internal Communications

Throughout the development and adoption process of an AI Policy for staff at Arts Council England, internal communication was key. Key activities during the AI Project were introduced in the staff newsletter and supported by blog posts. We held an all-staff meeting to share insights from the survey and outline next steps, which was attended by 200 staff. We held a further all-staff meeting to launch the AI Policy, which was again attended by 200 staff. At these sessions we shared our process and answered questions from attendees. We also encouraged staff to reach out with further questions or concerns, and flagged the AI Oversight Group, and Responsible AI Reference Group members, as further points of contact.

Alongside all staff meetings, we regularly attended directorate meetings, team meetings, and senior leadership group meetings. We wanted to people to know that the development of AI policies and practices at Arts Council England was a collaborative effort, that was proactive, and values led, rather than reactive, and efficiency driven.

We created an intranet space as a central repository for the 'Generative AI Policy: Using Generative AI Tools as an Arts Council England Employee (AI policy for staff)' and 'AI Risk List', which also provided a mechanism to support the development of AI Literacy. The AI section of the Arts Council England intranet includes topical articles, signposting to online learning courses, and short explainer guides on how to use Microsoft Co-Pilot. The content on this section of the website will be regularly updated, and it is hoped that in the future it will also feature a custom learning and development offer which has been designed for the specific needs of Arts Council England.



“

**I think it would be helpful to have an answer ready on how we use it and what we think is a responsible way to approach AI (including the use of AI in applications).**

”

Staff  
Survey  
Quotes



## Pilots

To help us understand AI's potential applications within Arts Council England, in September 2024 we initiated five pilot projects across various business functions, including IT, HR, Investment, and Communications. These pilots are small-scale, requiring minimal resource investment and operating within a structured test environment. They assess use cases that could inform broader adoption across Arts Council England's operations. Fundamental to the pilot projects was that their outputs were not used in a live environment. All tasks were completed as they normally would be by a human, with AI replicating the process for research purposes.

The pilots followed a consistent methodology aligned with the Generative AI Framework for HM Government, ensuring they are legally compliant, ethically robust, and delivered in a responsible manner. Fortnightly project team meetings oversaw progress and risk management, and close collaboration with our Information Management team ensured full GDPR compliance. Updates were provided to the AI Oversight Group and the Responsible AI Reference Group and communicated to staff via the intranet and staff newsletter.

Each project has been delivered jointly by a member of the NT&I team and a lead from the relevant business team, supporting the organisation-wide development of AI literacy. An external developer supported four of the pilots, working alongside Arts Council England's Solution Architect to embed this learning within the IT team.

The main objective of the pilots has been to explore the practical application of AI within Arts Council England, rather than to implement fully developed business solutions. We have gained a wealth of learning from the pilots. Findings include:

- A robust project methodology and project management framework is critical to delivering pilots at pace and in a legal and responsible way.
- It was important to involve staff from across the business areas we supported, and projects ran more effectively when we had senior level buy-in from the department.
- Working alongside colleagues from IT and information we've built considerable AI literacy through the pilots. This includes developing a much better understanding of different AI tools and pricing models.
- The pilots reiterated that AI is not a silver bullet. AI relies on good quality data and works best with well-defined and efficient systems and processes.

The five pilot projects were:

| Project  | Business Function     | Purpose  |
|--|-----------------------|--|
| Recruitment Question Generator                       | HR                    | Use AI to generate candidate questions from job descriptions for the new Applied recruitment system.                 |
| Develop Your Creative Practice Eligibility Checker   | Investment Operations | Use AI to flag potentially ineligible grant applications to human reviewers and support classifying of applications. |
| National Lottery Project Grants Case Study Generator | Advocacy & Comms      | Use AI to automate case study production   |
| Recruitment Shortlisting Efficiencies                | HR                    | Use AI to support human reviewers with candidate shortlisting in high-volume recruitment.                            |
| Copilot for Workplace efficiencies                   | IT                    | Test Microsoft Copilot for automating administrative tasks.  |

The success of the AI Pilots was assessed using a number of criteria, including: their ability to help teams understand potential solutions for business use-cases, potential time-saving by staff members, GDPR risk, technical complexity and the AI skills/capacity imparted within each team.

Of the Pilots, the Recruitment Question Generator and National Lottery Project Grants Case Study Generator are being explored to see whether they could be used by the owning teams (HR and Comms).



## AI Triage Service

To support adoption, and aid the development of the policy, risk list, and pilots' methodology, we established a mechanism for triaging questions about the use of AI at Arts Council England. As there were multiple people working on the AI Project, we didn't want individuals responding to queries through their normal inbox, as this would not allow us to analyse questions or issues being raised and would result in siloed working. Instead, we created a new dedicated email address for staff to use when they had questions about the use of AI in their working practices.

Questions are addressed through a triage meeting which includes representatives from: New Technologies and Innovation, IT, Data, and Governance – with additional staff invited as useful. The types of questions being fielded by the group is varied: from the suitability and GDPR-compliance of AI tools, to reflections on dealing with funding applications that have been written using AI tools. Alongside supporting the operationalising of the AI Policy, the inbox provides an important data set for policy and resource development.



## Concluding Thoughts

- Our approach to delivering the AI project has emphasised consultation and reflection. This has enabled us to develop an informed understanding and evidence base for our work on AI. We have sought to minimise the potential for risk by carefully introducing exploratory pilots where we can test tools and methodologies without real-world consequences. Working closely with the comms team to manage how we talk about our AI work, and present its outputs, is also contributing to risk mitigation.
- Over the course of the last 12 months, we have sought to drive learning and development through applied action research, offering staff the opportunity to learn new skills, and apply their existing knowledge to the application of new technologies. We have sought to work across the organisation, and in doing so have created a solid foundation for future AI adoption.
- Across the AI Project Team, AI Oversight Group, AI Staff Reference Group, and Pilot Projects (HR, IT, Investment Operations, Advocacy and Communications) we have engaged around 45 staff in direct delivery or consultation. These staff now hold essential skills that will support responsible engagement with AI technologies across the organisation should Arts Council England decide to further implement AI solutions.
- It is important that this consultation – both with staff and external bodies - continues. Our AI Staff Policy and Public statement will need to evolve as these technologies and attitudes to them also evolve. In order for this to happen successfully, the range of opinions and insight that it took to produce these documents will be required again to ensure any further iterations of the documents continue to reflect ACE's and the sector's values, as well as their varied views. As such the effort to date across all three areas of work will need to be an ongoing one.
- The adoption of AI technologies across society is creating new challenges and opportunities: from healthcare to education; from policing to welfare; and from entertainment to government. In this context, Arts Council England should equip itself, and support the sector, to understand the impact and potential of these far-reaching general-purpose technologies.
- As we have learnt throughout this work, there are no right answers. Instead, we have realised that we need to be able to stand over our working-out and justify the positions we are taking as an organisation. There is no time to wait for a definitive answer: AI is already here and is already being used by our staff and customers. Rather than waiting to become experts, we are instead seeking to develop an ongoing conversation, learning from our peers, our staff, and those that we serve in the creative and cultural sector.
- In many ways it is artists who help us to define and establish the questions we should be asking when it comes to thinking about AI technologies and their impact on society. A responsible interim approach to these emerging technologies may simply be - remember to ask questions, be curious, imagine a new world, support those that look at this technology differently, and listen to and platform diverse stakeholders.

- It is fitting to conclude this report with the words of a staff member, who in the staff survey said “The two worst things we can do with AI is ignore it or embrace it too gleefully. We need to see where it will benefit existing practices, not simply look for existing practices where it can be applied just because it can”.
- Arts Council England, then, is not asking: how should we use AI? but why would we use AI? The answer to that question provides the foundation for responsibly engaging with these fast-evolving and wide-reaching technologies.

“

**Whilst I appreciate there are risks and concerns in relation to AI there are also some exciting opportunities for ACE to position itself as a sector development organisation across multiple disciplines helping to advocate for the sector and help shape policy.**

”



## Acknowledgements

The work presented in this report is the result of a large collaborative team effort at Arts Council England. We would like to pay particular thanks to those that have worked on this project over the last year: Sinéad Burke, Nicholas Carter, Paul Glinkowski, Carl Stevens, Lydia Watkins.

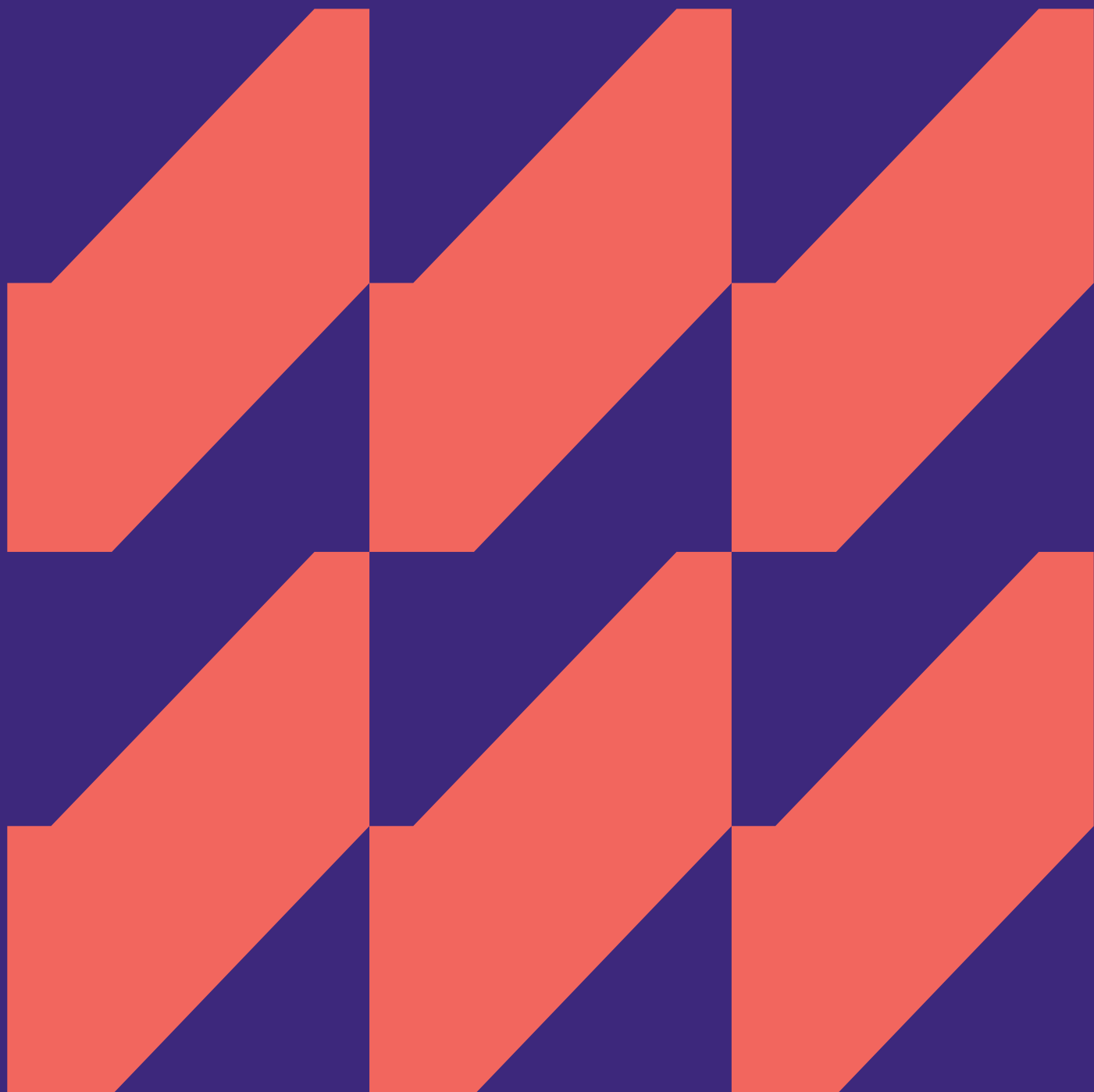
We would also like to thank peer organisations who generously shared their experience and learning with us: BFI, National Lottery Community Fund, BBC, National Lottery Heritage Fund, National Literary Trust, CAST AI for Grantmakers Peer Group, Paul Hamlyn Foundation.

**This report is an output of a Bridging Responsible AI Divides (BRAID) Fellowship, a partnership between Arts Council England and Dr Oonagh Murphy, Goldsmiths and is funded by the Arts and Humanities Research Council.** Through the BRAID programme Dr Oonagh Murphy, Turing Fellow and Senior Lecturer in Digital Culture and Society at Goldsmiths, is working as an embedded Responsible AI Fellow at Arts Council England from May 2024 - October 2025.

BRAID is a UK wide programme dedicated to integrating Arts and Humanities research more fully into the Responsible AI ecosystem, as well as bridging the divides between academic, industry, policy and regulatory work on responsible AI. Funded by the Arts and Humanities Research Council (AHRC), BRAID represents AHRC's major investment in enabling responsible AI in the UK. The Programme runs from 2022 to 2028. Working in partnership with the Ada Lovelace Institute and BBC, BRAID supports a network of interdisciplinary researchers and partnering organisations through the delivery of funding calls, community building events, and a series of programmed activities.

Funding reference: Arts and Humanities Research Council grant number AH/X007146/1

Learn more at: [www.braid.org.uk](http://www.braid.org.uk)



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