Intellectual Property Office

Attachment 3 - Specification

AI Creator Control Tender Specification

Summary and objective

1. On 18 March 2026 the government published a report on copyright and AI. Alongside this, the government committed to conduct a review of creator control, which would consider how technical tools and transparency could improve creators' control over how their works are used within AI systems. The Intellectual Property Office (IPO) is working with the Department for Digital, Culture, Media and Sport (DCMS) on this review.

2. The IPO requires a supplier to provide research to support this review. The intention is that this will be a four-month project including an interim report (shared with policy officials) and final report (prepared for external publication). The Government may wish to communicate initial findings from the interim report prior to their formal publication in the final report.

3. The research will focus on technical tools and standards, and their use by right holders to control access to, and use of their works online. It will also consider transparency in relation to online bots, web crawlers and AI agents. This research will provide up to date information to the government about how the market is developing and deploying these tools and standards, their level of take up and whether there is an appropriate role for government in addressing barriers or issues in the market.

Background to the IPO

4. The IPO is an Executive Agency of the Department for Business, Innovation, Science, and Trade (BIST). It is responsible for intellectual property (IP) policy, registering and granting IP rights, and a range of IP services. It aims to stimulate creativity and innovation and enhance the international competitiveness of British industry and commerce. It is working closely with DCMS on AI and human creativity.

5. Further information about the IPO can be found on its website at: www.ipo.gov.uk

Background to the requirement

6. In December 2024 the government published a consultation[1] on the use of copyright works in the development of artificial intelligence (AI) systems. The consultation considered the application of UK copyright law to AI systems, as well

[1] https://www.gov.uk/government/consultations/copyright-and-artificial-intelligence/copyright-and-artificial-intelligence

as other related issues, including how greater transparency about the training of AI models and the use of technical tools and standards can help right holders control the use of their content online.

7. The government published a report on copyright and AI in March 2026.[2] The report detailed its findings from the 11,520 responses it received to the consultation and set out its future policy direction. Alongside the report, a written Ministerial Statement[3] set out four areas that the government committed to focus on in the next phase of its work.

8. One of these is a commitment to conduct a review of the mechanisms available for creators to control their works online, including technical solutions and standards, and best practice on input transparency. The review will be informed by stakeholder engagement and wider policy analysis, including the research which is the subject of this tender. The purpose of this research is to ensure the review is properly informed by up-to-date technical analysis of the latest tools, standards, and market developments.

9. The research will comprise:

    a. analysis of the latest technical tools and standards supporting creator control, their use and application;
    b. analysis of technical approaches to, and best practice on, web crawler transparency.

10. This technical research will be complemented by separate research surveying Creative Industries businesses on their awareness, use and experience of technical tools, including barriers to their use (see Annex A for details this must be used a context only and does not make as part of this tender). The research will inform our wider review which aims to identify where there are gaps in right holder's ability to control access to and use of their content and whether there is an appropriate role for government in addressing them.

Technical tools and standards

11. Some AI systems use creative content which has been made available on the internet and other public platforms. Such content may be used at various stages in the development and use of an AI system, including model training and fine-tuning, and grounding at the point of use to ensure factually accurate responses.

[2] https://www.gov.uk/government/publications/report-and-impact-assessment-on-copyright-and-artificial-intelligence/report-on-copyright-and-artificial-intelligence
[3] https://questions-statements.parliament.uk/written-statements/detail/2026-03-18/hcws1416

Some right holders experience difficulty in controlling access to their content and ensuring its use is in accordance with their wishes.

12. Technical tools and standards can enable right holders to manage or express their wishes as to how their work should be accessed and used, helping them to control and license it. These tools play an important role in mediating the use of online content with AI, including through web crawlers and AI agents.

13. The market for these tools and standards is developing rapidly. However, our current understanding is that they do not yet support all right holders' needs, and there are challenges with adoption across sectors, and adherence of content users to the preferences expressed[4]. Respondents to the government's consultation supported the development and use of technical tools and standards, but there were different views on the extent to which government intervention is needed.

14. The Government's Report on Copyright and AI explored the role of technical tools and standards in supporting right holder control. It concluded that the Government should work with experts and industry to support the development of best practice and adoption of market-led tools and standards. This review will inform this work.

Transparency over web crawler activity

15. Right holders will often find it difficult to know who has accessed their content online and for what purposes. This can make it challenging to prevent unwanted use of content, to offer appropriate licences, and to enforce rights.

16. Operators of web crawlers take different approaches to transparency. Some voluntarily disclose the names of their crawlers, the purposes for which they are used, and how to interact with them. But there is no legal requirement to provide transparency information about web crawlers, and operators of them have been criticised for lack of sufficient transparency.

17. Many respondents to the copyright and AI consultation supported greater disclosure by AI developers about the content they use to train their models, and in other aspects of AI-based services. This included greater transparency about web crawlers and other means through which content is obtained and used. However, the creative industries and AI sector differed over the granularity and scope of disclosure, and whether regulation was needed. Views were also mixed on whether the UK should follow the transparency approaches adopted in other countries.

18. In its report, the government proposed to work on transparency best practice with industry and other experts, to help right holders enforce their rights.

[4] Somesite I Used To Crawl: Awareness, Agency and Efficacy in Protecting Content Creators From AI Crawlers

Scope of the requirement

19. The research must address two connected areas:
    a. Technical tools and standards: current and emerging tools and standards used by right holders to communicate or implement preferences concerning access to and use of online content, including their adoption, effectiveness, limitations and market development.
    b. Web crawler transparency: current and emerging approaches to improving transparency about web crawlers, including their identity, operators, purposes and relevant activities.

20. The principal focus of the research must be the UK. Relevant international tools, standards, market practices and regulatory developments should also be considered where they affect, or provide material comparator evidence for, the UK.

21. The Supplier should set out their proposed methodology ensuring the methodology addresses the research questions below. The proposed methodology should cover how the supplier will carry out the work including key tasks and activities and set out how the proposal meets our requirements and rationale for the proposed approach. The work required will include a literature and evidence review for each element, expert analysis and evidence gathering.

Technical tools and standards

22. The Supplier is expected to provide a full and comprehensive understanding of the current state of the art in technical tools and standards. This should focus on web-based tools and standards in particular, including those operating at the website level and content level. It should explore their adoption by right holders and identify any barriers to their development, adoption and diffusion.

23. The Supplier will be expected to conduct research, and produce a report, that:

- Provides detailed and up-to-date evidence of **the types of tools and standards** available in the market and under development, the specific needs they seek to address (e.g. restricting access, permitting specific uses, enabling licensing, supporting enforcement, etc), and their relevance to specific sectors and content types.
- Assesses the **capabilities and limitations of tools and standards**, both from a technical and a user viewpoint, why these arise, and their likely effects.

This should include compliance with these tools, including how web crawlers and AI agents recognise and respect rights reservations and access controls. This should assess the types of content covered.

- Considers the **impact of technical tools and standards** on AI, content markets and the wider online environment. This should include impacts on AI developers and right holders, including small businesses and individuals.
- Explores **the adoption of tools and standards**, including providing evidence on the level of adoption and any barriers and enablers to it, including where these arise from market factors or regulatory intervention (such as EU regulation).
- Explores **current and future trends**, such as the increasing use of AI agents, on technical tools and standards, and how those developing tools and standards are responding to this.

24. The research should be informed by expert analysis on the use and impact of these tools and standards, including through engagement with industry experts and other stakeholders, where appropriate.

Web crawler transparency

25. The Supplier will be expected to research and report on how transparency measures regarding the use of web crawlers are approached in the market.

26. The Supplier should conduct research, and produce a report, that:
    - Examines approaches to web crawler transparency and authenticity. This should include the type of information that can be reasonably provided about web crawlers, such as their identity, operator, purposes, collection practices, and how they comply with website preferences. It should also consider approaches to providing information while maintaining security and privacy. The research should consider voluntary approaches and initiatives as well as action taken in response to regulation.

    - Includes consideration of crawlers directly controlled by AI developers as well as those operated by third party data aggregators, businesses in the wider economy and researchers.

27. The research should be informed by expert analysis, including through engagement with industry experts and other stakeholders, where appropriate.

Methods

Review of evidence and engagement with experts

28. The Supplier shall conduct a review of existing evidence to map the current landscape for both elements of this research (technical tools and standards and transparency). The scope of this review would include, but not necessarily be limited to, industry reports, academic papers, government publications and news archives. The Supplier should detail in their response if they propose any changes to this scope.

29. The supplier must detail in their response their approach to engaging industry experts and other stakeholders. This may include interviews with a range of stakeholders and whether the supplier intends to utilise existing expert groups.

30. The supplier must detail their proposed approach for presenting the results in the final report, as well as the approach to quality assurance.

Project Milestones

31. Indicative project milestones are set out below:

Milestone	Description	Timeframe
1	Start-up meeting and Confirm requirement with IPO	Within 1 week of contract award
2	Interim report setting out progress and initial findings	Within 12 weeks of contract start date
3	IPO and DCMS consolidated review and feedback on the interim report.	Within 14 weeks of contract start date
4	Final revisions and completed report	Within 16 weeks of contract start date

Outputs

32. Research materials:
    - Any stakeholder engagement plans, contact lists and topic guides are to be shared with IPO and DCMS officials for approval given the sensitive nature of this subject area.
    - Final methodology including any technical data collection method details.

Buyer and Supplier responsibilities

33. **The IPO will:**

- provide available background information reasonably required for delivery;
- identify appropriate IPO/DCMS contacts;
- review materials requiring approval;

- provide consolidated comments on submitted deliverables; and
- notify the Supplier of known matters that may materially affect delivery.

34. **The Supplier must:**

- manage and deliver the research in accordance with the agreed methodology and timetable;
- secure the expertise and stakeholder engagement needed for delivery;
- identify and manage delivery risks and dependencies;
- notify the IPO promptly of material risks, delays, evidence gaps or required decisions; and
- quality-assure deliverables before submission.

35. Deliverables must:

- address the applicable requirements of this Specification;
- be complete and internally consistent;
- be supported by appropriate and traceable evidence;
- identify material limitations, uncertainty and evidence gaps;
- distinguish appropriately between evidence, stakeholder views and Supplier analysis;
- have completed the Supplier's quality-assurance process; and
- be presented in the agreed format and to a standard suitable for the intended audience.

Where a deliverable does not meet the agreed requirements, the IPO may require reasonable corrections before acceptance.

Reporting:

36. An interim report will be presented to relevant IPO and DCMS officials within 12 weeks of the contract start (estimated March 2027). Note that the Government may wish to communicate findings based on the interim prior to publication of the final report.

37. The Supplier will send a final report of its findings to the IPO at the end of the contract (estimated April 2027). The report may be published on gov.uk.

Timings

38. This will be a 4-month project, with findings made available to IPO/DCMS in March, and the final report being prepared for April.

Budget

39. The total budget available for this commission is between £80,000 to £100,000 (inclusive of VAT).

Resources

40. The successful supplier will need to provide sufficient, suitably experienced resource to achieve the required outcomes within the period of the contract. Given the timescales and technical nature of the research, we would expect providers to have pre-existing knowledge, expertise and contacts in the relevant area.

Security requirements and confidentiality

41. Confidentiality: The potential provider will comply with all confidentiality clauses under the terms of the contract in respect of all work carried out for the customer. The IPO reserves the right to request that the successful supplier enter into an NDA.

Sustainability

42. The IPO has a responsibility to act and to support nature, the environment, and its vital contributions to biodiversity. The Potential Provider is required to act in sustainable manner in the delivery of the Contract, particularly in terms of eliminating waste, reducing travel, and minimising energy consumption. The Potential Provider must comply with all current legislation regarding sustainability and legislation introduced or amended during the period of the contract pertaining to this.

43. This must include compliance with the Modern Slavery Act 2015 and the Climate Change Act 2008.

44. The Potential Provider must consider their carbon footprint in allocating and deploying resources to undertake requirement.

Continuous improvement

45. This is a reasonably short, succinct piece of work. As such, the potential provider's performance will not have specific in-built requirements for continuous improvement.

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Payment

46. Payment will be made in accordance with the agreed payment schedule following acceptance of the relevant deliverable(s) against the acceptance requirements set out in the Specification.

47. Before payment, any invoices that are received must include a detailed breakdown of the work completed and the associated costs.

48. All invoices must quote a relevant IPO Purchase Order and Contract reference number and be emailed to payables@ipo.gov.uk.

49. Payment will be made within 30 days of receipt of invoice.