

National Library of Australia

# Artificial Intelligence Framework

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## Version History

Version no.	Date of approval	Approval Authority	Revisions made
1	21 Feb 2025	Library Council	

# 1. Executive Summary

Australian government consultations on safe and responsible Artificial Intelligence (AI)<sup>1</sup> have found that the public expects governments to be exemplars of safe and responsible adoption and use of AI technologies.<sup>2</sup>

The National Library of Australia (Library) is working to leverage these technologies to deliver our mission while retaining our trusted and respected reputation.

Our vision for guiding that work is to legally and responsibly innovate with AI to ethically unlock the national collection, amplifying its discoverability, breadth, accessibility and impact in ways that do not perpetrate or entrench harms. We will use AI to extend the Library's practices to support its statutory role of maintaining, developing and protecting a national collection of library material so Australians can discover, learn and create new knowledge, now and in the future.

This framework sets out how we intend to pursue this work.

AI technologies present opportunities for developing new ways to collect, understand and share the collection in the face of evolving regulation in privacy, copyright, Indigenous Cultural and Intellectual Property (ICIP), Indigenous data sovereignty, inclusion, accessibility, digital collecting and cyber security risk. AI technologies can also classify and manage information. Providing new pathways to discovery in this way means we can improve the public's engagement with our collections, increasing their impact to pursue this work over the next several years.

Our approach to AI and emerging ways of presenting, interrogating and exploring knowledge and meaning necessitates careful deliberation and measured enthusiasm. At the same time, the Library's legal and statutory obligations cannot be compromised with the introduction of new technologies. That is why we will apply a principles-based framework that will see AI implemented only in service to our Corporate Plan and Digital Strategy, and aligned with our risk management framework. We will deliver benefit to the public, partners and staff in a risk-managed, staged and ethical way, implementing guardrails and governance across our organisational capability pillars, acting in the public interest with our technology choices and ethical considerations.

Technological advancements also present opportunities, risks and uncertainty. They have implications for skills, talent, operating models and resources across the organisation. As such, we will develop a 'whole-of Library' approach to AI training and capability development. We will adopt technology to enhance collecting and improve Library workflows, digital operations and services to the public in line with Australian Government obligations and new AI-specific frameworks, such as ethics and assurance of AI. The Library will also actively engage in these issues in partnership with the Galleries, Libraries, Archives and Museum

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<sup>1</sup> The Digital Transformation Agency (DTA) uses the [OECD definition of an Artificial Intelligence \(AI\) system](#)<sup>1</sup>: "An AI system is a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment."

<sup>2</sup> [Policy for the responsible use of AI in government](#)

(GLAM) sector, the research sector and other partners, while ensuring the safety and security of our collection.

This document is hierarchically structured with increasing granularity:

- government context and direction in the adoption and governance of AI, its benefits, risks, assurance and ethical considerations
- Library-specific context and direction in adopting and governing AI, its benefits, risks, assurance and ethical considerations, particularly regarding the Library's statutory role as a national collecting institution
- principles for AI use in the Library and Library-specific AI use cases that help deliver strategic priorities
- governance frameworks to support development of policies and processes, and
- issues that will require ongoing engagement and solutions.

This AI Framework is the National Library's first word on how it will leverage AI in delivering its mission – not its last. In line with our Digital Strategy 2024-27, it will be reviewed regularly to ensure transparency and currency in a changing and multi-layered operating environment.

## 2. Context

The digital transition has fundamentally changed the ways collecting and memory institutions operate.<sup>3</sup> In terms of AI, capabilities like machine learning (which uses data and algorithms to help AI mimic human learning); deep learning (which trains computers to handle data similarly to how humans do, such as identifying data types and patterns); and generative AI (which uses data models to generate new examples of content such as text, images, audio, and computer code)<sup>4</sup> are already being incorporated into common online tools as standalone systems or embedded within other applications.

High-profile and widely used technology applied from AI research and development over the last decade has raised the expectations of information managers like the Library. Large technology companies and others have lifted the public's expectations by, for example, demonstrating that search systems can understand the context and intent of the human searcher, summarise results and not just match keywords but locate content, including text, sound and image. Applications of large language models include capabilities such as auto-complete, grammar correction, language translation, speech recognition, computer-programming and semantic searching. Collecting institutions internationally, for example the National Library of Norway<sup>5</sup>, are piloting and using AI technologies to transform transcription of sound, image and digital archives<sup>6</sup>. As AI becomes ubiquitous, in-use and yet-to-be-imagined developments will further expand the influence of information technology on society in general and again raise both opportunities for and expectations of information managers.

Against this backdrop, the National Library functions within two contexts: the Australian Government context and our own operational context.

### Australian Government Context

Australian government consultations on safe and responsible AI found that the public expects government to be an exemplar of safe and responsible adoption and use of AI technologies.<sup>7</sup>

Over the past few years, the Australian Government has developed policies and guidance regarding AI ethics principles, assurance and implementation (refer Appendices). The government encourages corporate Commonwealth entities like the Library to apply the 'Policy for the responsible use of AI in government', which aims to embrace the benefits, strengthen public trust, and adapt over time to embed a forward-leaning, adaptive approach for government's use of AI that can evolve and develop over time.<sup>8</sup>

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<sup>3</sup> <https://www.nla.gov.au/sites/default/files/2024-08/nla-digital-strategy-2024-7.pdf>

<sup>4</sup> <https://architecture.digital.gov.au/ai>

<sup>5</sup> <https://arxiv.org/pdf/2402.01917>

<sup>6</sup> [Conference Program & Book of Abstracts Fantastic Futures | NFSA](#)

<sup>7</sup> [Policy for the responsible use of AI in government](#)

<sup>8</sup> <https://www.digital.gov.au/policy/ai/aim>

Additionally, the framework for the assurance of artificial intelligence in government<sup>9</sup> provides for a nationally consistent approach, describing ‘cornerstones’ of assurance to be considered for implementation.

## National Library Context

The National Library manages collections, almost all of which are publicly available and increasingly born digital. Our role in national collaboration is unique and our collection reflects this diversity.

The collection comprises:

- Physical and digital material (such as the Australian Web Archive), which is solely owned by the National Library, and subject to a variety of copyright, access and ICIP conditions.
- Collections that are developed with partners, held and managed by the National Library. This includes catalogue metadata that describes the collections of other cultural institutions, digital copies of original materials from partner institutions, as well as the collaborative National eDeposit (NED)<sup>10</sup> service for collecting, preserving and accessing Australian contemporary digital publications, management of which is guided by engagement with the state and territory libraries<sup>11</sup> who are co-owners of NED.
- Licensed resources like research databases and commercial electronic resources, which are not owned by the National Library and not in scope for any AI activity.

The Library’s unique and significant analogue Australian collections are being digitised. Eventually, when rights allow, these collections can be freely accessible from anywhere. We have been thoughtful stewards for decades, curating, building, describing and preserving this knowledge for future generations. Responsibly governed, AI technologies offer an opportunity to build on this legacy by amplifying the impact and extent of the collection.

Responsible AI governance includes recognition of legal rights holders and their valid commercial interests. Where legal frameworks for AI are evolving or unclear, any development will proceed with caution and consent from relevant stakeholders and copyright owners will be sought. This includes engaging with external stakeholders such as the NED Steering Group, publishers and independent publishing communities. We will not on-sell or share in-copyright data under any circumstances. As discussed below, we recognise the rights of Indigenous peoples to control their own cultural and intellectual property.

The Library will look to AI to help further unlock the value and discoverability of the collection with capabilities like surface-enriched context, connections and pathways through the collection to strengthen discovery, learning and new knowledge. AI capabilities can extend the collection, assisting in acquisition of emerging information formats, and curation and description of content at scale to leverage the contextual information built by the Library over time. AI can be used to scale the Library’s capacity and capability to continue

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<sup>9</sup> <https://www.finance.gov.au/sites/default/files/2024-06/National-framework-for-the-assurance-of-AI-in-government.pdf>

<sup>10</sup> [National eDeposit \(NED\) - National and State Libraries Australasia](#)

<sup>11</sup> [Home - National and State Libraries Australasia](#)

collecting today what will matter tomorrow in a digital world. Where AI tools are available as enhancements to enterprise IT products, such as those embedded in Office 365<sup>12</sup>, we will responsibly implement these to build organisational capability.

Risks (refer [AI Risk Management](#) section) accompany transformational change opportunities, and the Library needs a way to navigate this. As custodians of the national collection, we are most alert to the risks of perpetrating harm or challenging trust in the stewardship of the collection.

Within our own operational context, we pursue several high-priority issues, which are discussed below.

## Research Sector

The National Library holds the largest digital cultural collection in Australia, including material that has been collaboratively collected and managed with other GLAM institutions, especially the state and territory libraries. This collection is of interest to researchers across disciplines, including those applying or interrogating AI technologies and cultures. The Library is increasingly sought as a partner for research projects, especially for applications for Australian Research Council grants.

Partnerships with the research sector can deliver significant benefits, both in assisting the Library to meet its mission and in enabling Australian research to guide better outcomes. We will pursue partnerships where complementary skill sets can be brought together and where mutual benefits are clearly identified, including improving or enhancing Library services, development of Library capability or enhanced contextual information on the collections.

The Library will only pursue partnerships that adhere to the broader principles and framework in this document. It is, however, likely that the Library will have more opportunities for partnerships than resources to support them, and decisions on which to join will focus on the greatest benefit to the public. This will apply irrespective of whether partnerships involve resourcing from or to the Library.

## Transparency

In our role as an inclusive, trusted institution and custodian of culturally important information resources, we champion transparency as a cornerstone of our democratic and cultural infrastructure. We seek to maintain trust by building collections as impartially as possible and our approach to AI will reflect the APS values<sup>13</sup>.

We will implement applicable government guidance and be transparent with all stakeholders – the public, partners, external peers and researchers – regarding AI frameworks, choices and implementations. Given the Australian Government's determination that Australians should know when they are being 'significantly impacted' by an AI system and should also be able to find out when an AI system is engaging with them<sup>14</sup>, the Library will ensure AI engagement is appropriately 'sign-posted' and explainable to users. In practice, this

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<sup>12</sup> <https://www.dta.gov.au/blogs/aps-trials-generative-ai-explore-safe-and-responsible-use-cases-government>

<sup>13</sup> [APS Values | Australian Public Service Commission](#)

<sup>14</sup> Data Availability and Transparency Bill 2020

will also mean signposting where we may not be able to identify all AI-assisted capabilities. In relation to the collections, this includes the curation of content, including websites, created by, or with the assistance of, AI tools and for internal capabilities where system vendors include AI within their products. As AI technology evolves, we will continue to investigate opportunities to expose contextual information regarding AI generated content.

We will always respect Australian copyright law and protect valid commercial interests to uphold our agreements and respect the *Copyright Act 1968*<sup>15</sup>.

## First Nations

We are on a journey to deepen our respectful recognition and engagement with First Australians. We respect Indigenous peoples as the rightful authorities over their intellectual and cultural property, which is reflected in our Indigenous Cultural and Intellectual Property (ICIP) Protocol. The Protocol includes principles that position First Nations peoples as cultural authorities of their knowledge and enables First Nations-led interpretation and management. AI technologies represent particular risks and opportunities to upholding these principles, as well as to discovering and accessing First Nations knowledges and culture.

ICIP rights are not well documented or identified for the majority of the collection due to historical collecting practices. While AI may offer the opportunity to better identify ICIP material, this may also magnify existing challenges in conducting consultation to seek clarity around appropriate access and contextual information. This needs to be aligned with implementing First Nations protocols.

Without comprehensive and reliable information about existing cultural property in collection material, working with generative AI technologies at scale carries the risk of contravening cultural rights and protocols, as well as misrepresentations. The Library acknowledges the concerns of First Nations Australians around generated content that mimics Indigenous knowledges without cultural authority. We will also need to respect any new government legislation regarding protection of cultural and intellectual property. Use of AI also conjures other risks affecting Aboriginal and Torres Strait people, including bias, racism and surfacing of harmful and distressing content at scale. While of particular relevance to Indigenous people, these concerns affect many other communities and are referred to elsewhere in this Framework.

To manage such risks, our AI ethics principles include human-centred values, such as respecting human rights, diversity and the autonomy of individuals. This includes following the UN Declaration on the Rights of Indigenous Peoples, which is reflected in the Australian Government AI Ethics Principles. The Government-recommended guardrails include human review of AI systems, transparency, application of Indigenous data sovereignty principles and signposting AI-generated or summarised content. The Library may consider a specific user feedback mechanism for this scenario with Indigenous-led governance. We will engage locally and internationally to understand this complex area, and welcome initiatives from the research sector in this space,<sup>16</sup> as well as ongoing engagement with Indigenous leaders in the information sector.

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<sup>15</sup> <https://www.legislation.gov.au/C1968A00063/latest/text>

<sup>16</sup> <https://www.kcl.ac.uk/research/ireal>



## Sustainability

Our commitment to building and managing our collections is matched by our commitment to making their integrity and accessibility sustainable. Implementation of AI technologies brings cost and environmental sustainability implications, which creates an additional challenge in the context of meeting the Australian Government's commitment to achieve net zero in government operations by 2030<sup>17</sup>, and the Roadmap for Net Zero Australian Public Service by 2030<sup>18</sup>. The Library's Emissions Reduction Plan addresses this commitment and will be reviewed over time to reflect any AI impacts. Costs of AI are multi-dimensional in areas like software, computing power including energy, AI services, AI-ready data, governance, security and risk management, as well as human talent and process development. Vendors are raising prices as they incorporate AI capabilities into their products. As a result, the cost of deployment can be unpredictable. The Library will address these considerations as part of its framework to assess the value of AI initiatives, using exploration and proofs of concept to demonstrate value against multiple measures, including cost-monitoring and the environmental impact of choosing a particular technology or solution.

## Organisational Cultural Change

In addition to its technical complexity, AI raises ethical questions for people within the Library. The Government's assurance framework<sup>19</sup> calls for implementation of capabilities that have broad implications for the development of staff awareness, knowledge and skills in AI relevant to their roles. Development of a thoughtful AI risk culture will include a gradual realigning of the risk-averse and risk-accepting tendencies in different parts of the Library, particularly in relation to our custodianship of the collection. This will require significant uplift of capability and understanding, promoting AI and data literacy, ensuring the entirety of our workforce is sufficiently informed and engaged and able to responsibly implement our AI principles in action.

Sharing professional skills, practice and knowledge will continue to be a priority, including with partner libraries, and the cultural and research sectors. We will develop an organisation-wide framework that will leverage existing learning 'planks' of the sector, to develop 'AI ambassadors', broader learning sessions, technical knowledge bases and open access to ongoing AI projects.

The Library is beginning its AI journey within these contexts. The next few pages detail the principles that underpin them.

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<sup>17</sup> [Net Zero in Government Operations Strategy](#)

<sup>18</sup> [APS Net Zero - Our path to Net Zero](#)

<sup>19</sup> <https://www.finance.gov.au/sites/default/files/2024-06/National-framework-for-the-assurance-of-AI-in-government.pdf>

## 3. Principles

### For use of AI in the Library

#### Legislation and policy compliance

- All our actions will comply with legislation and we will adopt all applicable government AI-related guidance.
- We will always respect Australian copyright law and protect valid commercial interests.
- We will respect the rights of First Nations peoples, including Indigenous Cultural and Intellectual Property.
- We will be transparent regarding AI frameworks, choices, and implementations, taking the opportunity to signpost 'explainable AI'.

#### Library mission

- The aim of every AI implementation will be to support the Library in its mission, as well as to enhance user engagement and inclusion, and broaden access to its collections and services.
- We will develop the Library's role within the broader GLAM, cultural and research sectors, collaborating through learning and engagement to draw on mutual skills, practice and knowledge in designing and developing AI use in the Australian context.
- We will prioritise inclusion in our approach and not introduce or amplify harms such as bias, inaccessibility or silencing of minority voices.
- We do not hide or alter bias or censor collection items.
- We will always consider the inherent value of the collection to the public interest.

### For Library-specific AI use cases

#### Governance

- We will assess the legality, value and appropriateness of AI solutions, implementing these only where other options are not appropriate.
- We will act in the public interest in our technology choices and ensure ethical considerations are foremost.
- We will seek to protect our data from external AI systems where their use contravenes the access rights of publishers and authors.

- For transparency, where the information is available to us, we will signpost for users where collection content, products or services are AI-generated or assisted, reveal classified, personal or otherwise sensitive information.<sup>20</sup>

### **Process and guardrails**

- Every AI implementation will include human review as part of build, deployment and operation.
- We will exercise caution in considering the use of language models.
- We will use out-of-copyright material and/or respect copyright and other rights before proofs of concepts commence and gain relevant approvals for any collection material to be used.
- Data processed by external services is retained only for the transaction's duration and is not stored by those services.
- We will prioritise projects built on AI technologies where there is a body of knowledge to support its application.

### **Technology and Systems**

- Decisions that modify IT infrastructure will be made with human review.
- Use AI to augment existing technology systems – AI technology will be developed and deployed not as a green-fields site replacing existing systems but as tools to augment and evolve existing systems and architecture that are already known and managed.
- Consider AI extensibility in cyber and infrastructure<sup>21</sup> – as the Library implements its cyber security and infrastructure plans, it will consider extensibility for AI requirements.

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<sup>20</sup> <https://architecture.digital.gov.au/guidance-generative-ai>

<sup>21</sup> <https://www.cyber.gov.au/resources-business-and-government/governance-and-user-education/artificial-intelligence/engaging-with-artificial-intelligence>

## 4. AI Opportunities

In both the government and Library contexts, AI uses can be classified across two dimensions reflected in the 'AI Opportunity Radar' below, which helps align investments with the Library mission and values, and to understand any associated cost, risk and benefit profiles. Public-facing functions/services are represented in the top half, with internal functions/services below.

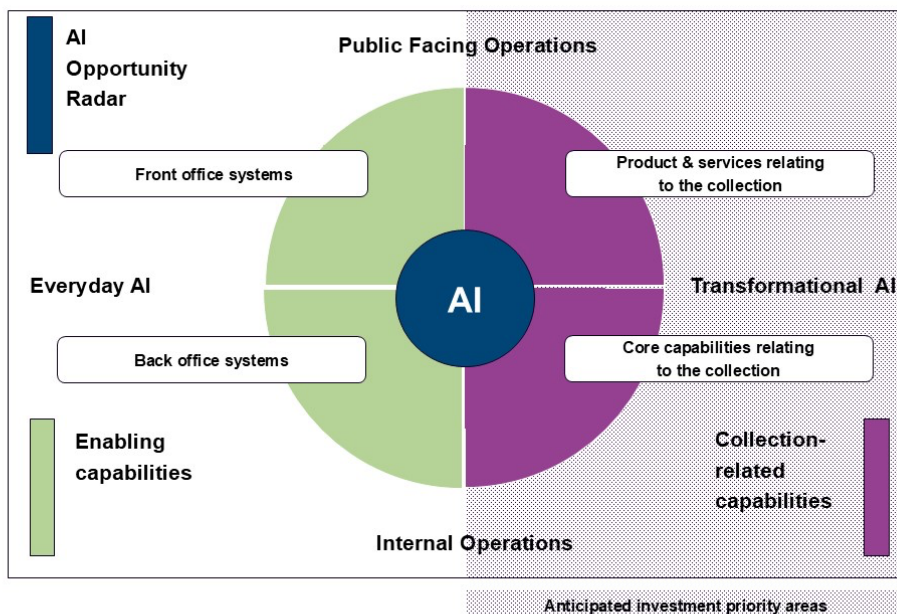


Figure 1 - Adapted from Gartner AI Opportunity Radar model with permission.

Potential benefits reside in one of four quadrants:

1. **Public-facing and significant 'Products and Services' related to the Collection** (top-right quadrant): 'flagship' Library systems to which the Library and partners contribute and are used every day by the public to engage with the collection. Examples are content search and delivery using the catalogue and Trove, as well as complex services like research guide development.
2. **Internal and significant 'Core Capabilities' related to the Collection** (bottom-right quadrant): specialised workflow and support systems used to create and sustain the value of the collection created by the Library and its partners. Examples are collection development, curation, description, preservation, metadata creation and sharing, automated audio transcription, and OCR/HTR correction.
3. **Internal and everyday 'Back Office' processes and systems** (bottom-left quadrant): general systems used by staff and automated systems to create and support the Library's systems. Examples are programming and office workflow automation tools and corporate/enterprise systems and tasks like minutes and report writing.
4. **Public-facing and everyday 'Front Office'** (top-left quadrant): general systems supporting public interaction, such as the Library's main website and simple services like reading room requests.

## AI Uses for the Library

By leveraging emerging technologies like AI, we strive to engage Australians with their history in ways that present historical and contemporary information in more interactive and enlightening formats, making the past more relatable and accessible. Our goal is to use these tools to foster deeper connections with Australia's heritage, encouraging reflection and new conversations.

To further unlock the value of the collection, we will prioritise investigation of uses in 'Products and Services' and 'Core Capabilities'. The Library will start by considering known low-risk use cases and leveraging AI solutions to maximise value or benefit to the collection, public or staff, noting that that the Principles (above) would apply to any use.

The Library recognises that use of AI in the 'Back Office' and 'Front Office' will evolve as IT tools continue to in-build AI enhancements.

The primary opportunities of implementing AI in a National Library are:

### Products and Services

- **Enhanced search and discovery:** improve the accessibility and discoverability of digital and physical collections through more contemporary experiences.
- **Partnership with GLAM and research sectors:** ethically research and engage with partners to investigate how AI will create new avenues for collecting, interrogating and understanding the collection, as well as how partnerships can increase transparency and understanding of AI.
- **Access for Australia's diverse audiences:** equitably improving access for people with disability and culturally and linguistically diverse communities to the collection.

### Core Capabilities

- **Tools to help build the collection:** helping discovery of new content by collecting new and emerging digital content and formats.
- **Tools to help manage the collection:** improving core library/information business productivity by using tools to suggest metadata like classification, perform anomaly detection, and produce text indexes for written materials.
- **Tools to help describe the collection and aid discovery:** undertaking speech-to-text transcription, description of images, original metadata creation.
- **Enhancing collection description:** augmenting existing metadata and text classifying content, identifying entities, recognising intent and translating text, using image models to describe and classify images and video, and to detect and describe objects.

### Back Office

- **Streamlining operations:** automating routine tasks to optimise resources, such as using AI assistants like Google image search or ChatGPT to aid routine writing tasks (refer [Interim guidance on government use of public generative AI tools](#)).
- **Improving operating efficiency and sustainability:** scaling the capacity and capability of staff to reduce labour-intensive, repetitive work practices by providing better staff enterprise tools that adopt or enable AI-enhanced capabilities in existing products.
- **Assisting with compliance/risk management:** including enlisting technology to help with cyber defences, detecting potential cyber security threats by analysing network traffic, user behaviour, and other indicators, providing early warnings of possible breaches and making our policy rules, regulations and processes easier to navigate and discover.

## Front Office

- **Enhance user experience:** develop AI-powered personalised content recommendations to provide instant assistance to users / staff and answer queries.
- **Enhance accessibility:** develop AI-powered accessibility solutions to assist individuals with disability in accessing library resources.

## AI Investment

From time to time, the Library will need to assess potential AI investment (such as in tools to augment and evolve existing systems) for value and impact. To that end, we have developed a framework that captures three priorities:

### 1. *Trusted Custodianship*

Our work depends on public trust. To maintain it, we ensure that we work within all Australians laws, respect copyright and the valid rights of creators to protect their commercial interests.<sup>22</sup>

### 2. *Unlock the Collection*

We are custodians of the collection on behalf of all Australians. This means we need to become more representative of our constituents and audiences.<sup>23</sup>

### 3. *Ethical and Explainable*

Our role as an inclusive, trusted institution will require strong ethical considerations and a commitment to transparency in how we engage with transformative ways of presenting, interrogating and exploring knowledge and meaning.

<sup>22</sup> [Creative Australia Principles: Generative Artificial Intelligence and creative work](#)

<sup>23</sup> <https://datascience.si.edu/ai-values-statement>

## 5. Governance and Frameworks

### Australian Government

This Framework is created to assure that legal, ethical, privacy, risk, and security implications are appropriately considered when using AI for Library work. Governance and frameworks for use of AI in the Library are to assure that AI tools are used to support human decision-making, not to replace it.

Integrity, stewardship and public trust are critical to the Library's consideration and application of AI ethics principles. The National framework for assurance of artificial intelligence in government<sup>24</sup> provides practices for governments to apply to their assurance of artificial intelligence against Australia's AI Ethics Principles<sup>25</sup>.

The Australian Government's 'Policy for the responsible use of AI in government' aims to "ensure that government plays a leadership role in embracing AI for the benefit of Australians while ensuring its safe, ethical and responsible use, in line with community expectations."<sup>26</sup>

The policy includes principles<sup>27</sup>, mandates and other requirements, which the National Library will implement, including designating official/s accountable for policy implementation. This will set the broad framework for responsible use of AI at the Library.

The Library will implement the following mandatory requirements of the [Policy for the responsible use of AI in government](#).

We will designate accountable official/s for policy implementation, with responsibility to:

- implement the policy in the National Library
- be a contact point for whole-of-government AI coordination
- engage in whole-of-government AI forums and processes
- engage with GLAM, cultural sector and research partners
- keep up to date with changing requirements as they evolve over time.

And we will make public AI transparency statements outlining:

- the Library's approach to AI adoption and use, with updates at least annually
- relevant information about the Library's use of AI including compliance with this policy, measures to monitor effectiveness of deployed AI systems, efforts to protect the public against negative impacts.

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<sup>24</sup> [National framework for the assurance of artificial intelligence in government](#)

<sup>25</sup> [Australia's AI Ethics Framework](#)

<sup>26</sup> [Policy for the responsible use of AI in government](#)

<sup>27</sup> Which are safe engagement with AI to enhance productivity, decision-making, policy outcomes and government service delivery; APS officers' ability to explain, justify and own advice and decisions when utilising AI; clear accountability for the adoption of AI and understanding its use; and building AI capability for the long term.

The Library will implement the following suggested requirements of the [Policy for the responsible use of AI in government](#):

1. AI fundamentals training for all staff.
2. Additional training as appropriate for all staff in consideration of their roles and responsibilities.
3. Understanding where and how AI is being used within the Library and developing an internal register with this information.
4. Nominate to participate in the pilot of the Australian Government's AI assurance framework and providing feedback to DTA on outcomes of the pilot to inform next steps.
5. Apply the Interim guidance on government use of public generative AI tools.<sup>28</sup>
6. Monitoring AI use cases to assess for unintended impacts.
7. Engaging with whole-of-government policy and governance requirements to ensure ongoing compliance and APS-wide capability uplift over time.
8. Reviewing on an ongoing basis the internal policies and government approaches to AI to ensure they remain fit for purpose. This includes ongoing review and update of Library-specific strategies, such as the collection of AI-generated content in the Collecting and Engagement Strategies.

The Library will consider potential mechanism/s for following suggested requirements of the [Policy for the responsible use of AI in government](#):

9. Integrating AI considerations into existing frameworks such as privacy, protective security, record keeping, cyber and data.

## Library

To guide implementation of this Framework and support accountable official/s in implementation and alignment with whole-of-government AI approaches, the Library will establish a cross-functional AI Steering Committee. The Committee will include cross-Library senior representation for decision-making and risk management, and engagement with stakeholders regarding implications for collection management and use.

The Committee's purpose will be to safeguard accountability, assess opportunities, set guardrails, and assess, monitor, and mitigate risk and ethics application throughout the AI lifecycle, ensuring line-of-sight to corporate risks. Under the oversight of this Committee, we will develop and implement operational governance including AI use case risk assessment, risk case assessment for vendor AI-enabled product roadmaps and exploration and adoption models incorporating guardrails. Guardrails will focus on preventing possible harms through testing, transparency and accountability.

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<sup>28</sup> [Interim guidance on government use of public generative AI tools - November 2023 | aga](#)



## 6. AI Risk Management

Transformational change opportunities are always accompanied by risk. To navigate this, the Library will develop an AI Risk Management Framework aligned with our existing enterprise risk frameworks and processes<sup>29</sup>. In addition to aligning with whole-of-government approaches, the Library will develop an approach appropriate to its role as a leading national collecting institution.

### AI Organisational Risk Assessment

In addition to using AI systems responsibly and applying ethical principles and organisational guardrails, a number other broader organisational risks need to be considered and managed.

- **Regulatory:** legal risks, adherence to regulatory compliance, privacy, copyright laws and emerging ICIP requirements, as well as government AI-specific governance and frameworks.
- **Reputational:** perception of bias or lack of transparency regarding treatment of the collection, e.g. impacts on ICIP rights.
- **Reputational:** the Library could be perceived as moving too slowly, or too fast, in its AI adoption. Misalignment with the speed of adoption of other like institutions.
- **Competencies:** talent management; change fatigue. The workforce will need to be trained to ensure data models are fit-for purpose and regularly monitored and updated. Whole-of-Library staff training in AI capabilities and the Library's application of policy.
- **Technical risk:** technical debt including poor data and data governance limitations.
- **Rapidly developing technology:** some decisions based on the current best understanding of the 'state of the art' may age well, others not so well, given the rate of development.
- **Governing and regulatory bodies progress:** these frameworks may progress at a slower pace than AI technology development and implementation.
- **Cultural:** external resistance to AI use by partners, collaborators, the public, etc. Internal staff knowledge, understanding and risk appetite for AI.
- **Management of copyright and intellectual property rights in the Library's collection:** the Copyright and Artificial Intelligence Reference Group, established by the Attorney-General's Department in 2024, is in the process of developing policy frameworks regarding the use of copyright material as inputs for AI systems. While current Australian copyright law - which operates by exception - does not permit large-scale copying and storage of in-copyright material (of the kind required for training of Large Language Models), there are several other scenarios where the copyright situation is unclear. In the interim, the

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<sup>29</sup> Discussion risk in high settings [https://storage.googleapis.com/converlens-au-industry/industry/p/prj2f6f02ebfe6a8190c7bdc/page/proposals\\_paper\\_for\\_introducing\\_mandatory\\_guardrails\\_for\\_ai\\_in\\_high\\_risk\\_settings.pdf](https://storage.googleapis.com/converlens-au-industry/industry/p/prj2f6f02ebfe6a8190c7bdc/page/proposals_paper_for_introducing_mandatory_guardrails_for_ai_in_high_risk_settings.pdf)

National Library will need to balance compliance with existing legislation and ethical frameworks while still fostering innovation.

## Risk Mitigation and AI Guardrails

Government policy<sup>30</sup> does not mandate which strategies organisations use to assess AI system risk but does suggest some risk considerations to use in assessment. The Government's proposals paper for introducing mandatory guardrails for AI in high-risk settings<sup>31</sup> and other frameworks (such as NSW's<sup>32</sup> and the OECD's<sup>33</sup>) provide a risk classification system for AI candidates. Library developments will be subject to risk assessment and the application of mitigations and guardrails.

The Voluntary AI Safety Standard<sup>34</sup> includes 10 voluntary guardrails<sup>35</sup> for AI systems and how to use them to help develop and deploy AI systems safely and reliably. These guardrails help organisations benefit from AI while mitigating and managing the risks AI may pose. The Library will tailor its response to the guardrails.

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<sup>30</sup> [Policy for the responsible use of AI in government](#)

<sup>31</sup> [https://storage.googleapis.com/converlens-au-industry/industry/p/prj2f6f02ebfe6a8190c7bdc/page/proposals\\_paper\\_for\\_introducing\\_mandatory\\_guardrails\\_for\\_ai\\_in\\_high\\_risk\\_settings.pdf](https://storage.googleapis.com/converlens-au-industry/industry/p/prj2f6f02ebfe6a8190c7bdc/page/proposals_paper_for_introducing_mandatory_guardrails_for_ai_in_high_risk_settings.pdf)

<sup>32</sup> <https://www.digital.nsw.gov.au/sites/default/files/2024-07/NSW-AI-Assessment-Framework-July-2024.pptx>

<sup>33</sup> OECD (2022), OECD Framework for the Classification of AI systems, *OECD Digital Economy Papers*, No.323, OECD Publishing, Paris, <https://doi.org/10.1787/cb6d9eca-en>.

<sup>34</sup> [Voluntary AI Safety Standard | Department of Industry Science and Resources](#)

<sup>35</sup> [The 10 guardrails | Voluntary AI Safety Standard | Department of Industry Science and Resources](#). The guardrails are: establish, implement and publish an accountability process including governance, internal capability and a strategy for regulatory compliance; establish and implement a risk management process to identify and mitigate risks; protect AI systems and implement data governance measures to manage data quality and provenance; test AI models and systems to evaluate model performance and monitor the system once deployed; enable human control or intervention in an AI system to achieve meaningful human oversight across the life cycle; inform end-users regarding AI-enabled decisions, interactions with AI and AI-generated content; establish processes for people impacted by AI systems to challenge use or outcomes; be transparent with other organisations across the AI supply chain about data, models and systems to help them effectively address risks; keep and maintain records to allow third parties to assess compliance with guardrails; and engage your stakeholders and evaluate their needs and circumstances, with a focus on safety, diversity, inclusion and fairness.

# Appendix 1 – Related legislation, regulations and policy frameworks

## APS conduct

[APS Code of Conduct](#)

[Public Service Act 1999](#)

## Artificial Intelligence

[Australia's AI Ethics Principles](#)

[Engaging with Artificial Intelligence \(AI\) guidance](#)

[Interim guidance on government use of public generative AI tools](#)

## Cyber and protective security

[2023-2030 Australian Cyber Security Strategy](#)

[Protective Security Policy Framework](#)

[Cyber Security Guidelines](#)

[NLA IT Security Policy](#)

## Data

[Framework for Governance of Indigenous Data](#)

[Foundational Four](#)

[Archives Act 1983](#)

[NLA Recordkeeping Responsibilities](#)

[Data-matching Act 1990](#)

[Data Availability and Transparency Act 2022](#)

[Notifiable Data Breaches scheme](#)

## Privacy

[Privacy Act 1988](#)

[NLA Privacy Policy](#)

## Risk

[Commonwealth Risk Management Policy](#)

## Intellectual Property

[Copyright Act 1968](#)

[Intellectual property principles for Commonwealth entities](#)

[Protocols for using First Nations Cultural and Intellectual Property in the Arts - Creative Australia](#)

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