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CASE STUDY · MARLUC SYNOPSIS

UK Ministry of Defence AI governance and adoption

IMPLEMENTED 2021–2025 · DEFENCE AND SECURITY · UK · BAND E · PARTLY PROVED

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The MOD named a responsible AI senior officer in each part of Defence. Its own 2025 report calls implementation formative, and a House of Commons committee found a gap between the department's rhetoric and reality on AI. No results from AI use are reported.

ABOUT THIS SYNOPSIS

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Facts and figures are as reported by the sources listed below, which may be incomplete, self-reported or out of date. Check the original source before relying on any figure.

The impact band, proof marker and SEAM view are MarLuc's opinion. The organisation is not a MarLuc client and has not reviewed or endorsed this synopsis. Names and trademarks belong to their owners.

NOTICE WORDING LAST UPDATED 16 NOVEMBER 2026

AT A GLANCE

No measurable effect: no results reported.

AI used: Organisation-wide AI governance and adoption framework (policy, officers, assurance); specific systems not described.

Implemented: 2021–2025. Grade: band E, No measurable effect, Partly proved.

Headline result, as reported: MOD reports a responsible AI senior officer in each of 17 Defence organisations and calls implementation formative; a Commons committee found a gap between rhetoric and reality on AI, January 2025

1 · The case

The facts, as reported by the 4 sources listed at the end. Where a source is silent, the field says "Not reported".

Organisation

UK Ministry of Defence. The UK government department responsible for the armed forces. This case covers its organisation-wide approach to governing AI adoption, not any single system. Headcount and turnover are not given in the sources reviewed. Canvas block: 8. Governance and risk. Also 5. People and skills, 6. Data and technology.

Business challenge

The challenge. The MOD says it must use AI where it delivers clear benefits while meeting legal obligations and the values of the public it serves, and that AI also brings risks. It says it wants to embed AI into everyday decision-making and operations where that makes sense.

How it was addressed. The MOD published five AI ethical principles in 2022 and Dependable AI (JSP 936) in 2024. Each component organisation nominated a Responsible AI Senior Officer, who submits annual statements of AI ethical assurance backed by auditable evidence. Central support comes from the Defence AI Centre and the Defence AI and Autonomy Unit, and an AI Ethics Advisory Panel gives scrutiny and challenge. [1] [2] [3] [4]

Who implemented it

In-house (In-house): Runs the framework through its component organisations, the Defence AI Centre and the Defence AI and Autonomy Unit..

Technology (SEAM pillar E)

SEAM types: not established; the sources do not say how the system works. Deployment: Not reported. Vendors and products: Not reported.

Where it was built in: Not reported. The sources describe governance across component organisations and do not name systems.

What changed

Before: the House of Commons Defence Committee reported in January 2025 that MOD policy documents described AI as transformative but the department did not behave as though this were the case. After: by October 2025 the MOD reports named senior officers and annual assurance statements in each component organisation, and says implementation is at a formative stage. Measured results from AI use: Not reported. [1] [2] [3] [4]

What it cost

Not reported. A witness estimate of UK defence AI funding in oral evidence to the committee is not an audited figure and is not used here.

What it saved

Not reported. [1] [2] [3] [4]

Governance and control

Named senior officers, annual assurance statements with auditable evidence, an AI Ethics Advisory Panel that has met ten times, and central assurance frameworks, by the MOD's account. The officers do not act as developers, testers or certifiers of AI systems. The Defence Committee and the National Audit Office provide outside scrutiny of related areas.

S2 · Accountable owner · Claimed
Each component organisation nominated a Responsible AI Senior Officer who submits annual statements of AI ethical assurance. [1]

A1 · Safe use · Claimed
The MOD published five AI ethical principles in 2022 and JSP 936 in 2024, and has an AI Ethics Advisory Panel. [1]

A2 · Human in the loop · Claimed
The MOD says human involvement must be context appropriate and that humans are the accountable actor. [1]

A3 · Monitoring and assurance · Outside scrutiny (a regulator, court, auditor or similar body acted)
The House of Commons Defence Committee reviewed MOD AI capacity and adoption (January 2025); the NAO reviewed the wider Digital Strategy for Defence in 2022, not AI specifically. The MOD's assurance statements rest on evidence it holds. [2] [3] [4]

A4 · Vendor AI · Claimed
The MOD says it needs to become an intelligent customer of AI and avoid exposure to low-quality AI offerings. [1]

A5 · Agent controls · Not reported
Not reported.

A6 · Standards and regulation · Claimed
JSP 936 sets policy directives for responsible AI across Defence, by the MOD's account. [1]

What worked, what did not, what is unproven

WORKED

– Every component organisation named in the report has a Responsible AI Senior Officer, by the MOD's account.

– Over half of component organisations have introduced AI ethics guidance and training, by the MOD's account.

– Some organisations have embedded JSP 936 into existing assurance processes, by the MOD's account.

DID NOT

– The Defence Committee found a gap between the MOD's rhetoric and reality on AI, and said the Defence AI Strategy offers few specifics on how transformation will be achieved.

– The MOD's own report says a minority of component organisations are not yet exploiting AI and that skills are the most significant challenge.

– In 2022 the NAO found the MOD had no complete plan or clear way to measure progress on its wider Digital Strategy for Defence.

UNPROVEN

– Whether the governance framework changes decisions or outcomes in practice.

– Spending on defence AI, and any benefit measured against it.

– How many AI systems are in live use across Defence.

Timeline

2020 Defence AI Centre created [3]

2021 MOD establishes its AI Ethics Advisory Panel [1]

Jun 2022 Defence AI Strategy published [3]

2024 MOD publishes Dependable AI (JSP 936); component organisations then nominate Responsible AI Senior Officers [1]

Jan 2025 House of Commons Defence Committee reports on developing AI capacity and expertise in UK defence [3]

Oct 2025 MOD publishes its Responsible AI Senior Officers' Report 2025 [1]

2 · Grade and SEAM assessment

MarLuc's opinion, made on the evidence above. How cases are graded: marluc.co.uk/case-studies/how-we-rate

Level of change and impact

Claimed: Not applicable. Grade: E, No measurable effect. Proof: Partly proved. Level of change: Not graded.

No level assessed: band E, no results reported. The sources describe governance roles and policy; the MOD's report does not assess the effects of AI adoption, and no other source measures them.

Graded E, no results reported. The MOD has put responsible AI governance in place across Defence, by its own account, but its report says it does not address the wider impacts of AI adoption, and the Defence Committee found in January 2025 that the department's words on AI had not been borne out by action. Partly proved: the committee's finding is independent; the MOD's account of its governance is its own. The grade records that no results are published; it does not show that AI has had no effect.

The SEAM view and lessons learnt

The sources describe structure and intent, with no outcome measures, so the effect of AI on defence work cannot yet be separated from other digital change. A leadership team copying the approach should ask who is accountable when an officer without delivery responsibility signs an assurance statement, and how adoption will be measured beyond the existence of governance roles.

1. Name one accountable senior officer in every business unit.
2. Back assurance statements with auditable evidence.
3. Measure adoption and outcomes, as well as governance activity.

Evidence

Score 2 of 4. Mixed: the MOD's own report (self-reported) and an independent parliamentary committee report, relayed by the committee's press release (republished by Wired-Gov) and Janes.

Evaluation method. Self-reported organisation account, plus an independent parliamentary committee report. No evaluation of outcomes from AI use.

Sources disagree. The MOD says its RAISO statements show governance matches the level of AI activity and that JSP 936 has positioned it as a leader in responsible AI. The Defence Committee reported a gap between MOD rhetoric and action on AI. The two reports cover different aspects and dates.

Status. Ongoing: the MOD describes responsible AI implementation as at a formative stage as of

3 · Original sources

Read these in full. To challenge a fact or a grade, use the contact form at marluc.co.uk or the link on https://marluc.co.uk/case-studies/uk-mod-responsible-ai-senior-officers

[1] UK Ministry of Defence: Laying the Groundwork, Responsible AI Senior Officers' Report 2025
https://assets.publishing.service.gov.uk/media/68dfc52a750fcf90fa6ffdad/Laying_the_Groundwork_-_Responsible_AI_Senior_Officers__Report_2025.pdf

[2] Wired-Gov (republished House of Commons Defence Committee press release): Defence Committee: MOD must learn from Ukraine and embrace AI
https://wired-gov.net/wg/news.nsf/print/Defence+Committee+MOD+must+learn+from+Ukraine+and+embrace+AI+13012025112500

[3] Janes: UK parliament defence committee says country's use of AI in defence underdeveloped
https://www.janes.com/defence-intelligence-insights/defence-news/air/uk-parliament-defence-committee-says-countrys-use-of-ai-in-defence-underdeveloped-mod-must-adapt-rapidly

[4] National Audit Office: The Digital Strategy for Defence, a review of early implementation
https://nao.org.uk/press-releases/the-digital-strategy-for-defence-a-review-of-early-implementation

UK Ministry of Defence website: https://www.gov.uk/government/organisations/ministry-of-defence

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