

COMMON EUROPEAN  
DATA SPACE FOR  
CULTURAL HERITAGE



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# The case for Public AI: *making it happen with cultural heritage*





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# INTRODUCTION

AI has become a powerful and disruptive socio-cultural technology. Europe finds itself in a transitional state where the old rules no longer fully apply, and the new ones are not yet firmly established. At moments like this, Europe does not need a false choice between regulation and innovation. It needs an approach that enables innovation while ensuring that foundational technologies are governed by public values, rather than shaped by private interests alone. Fear of missing out should not become a justification for allowing private interests to shape technological development by default.

The more demanding – but ultimately more desirable – route for AI in Europe lies in between: deliberate, value-driven and institutionally grounded. Europe must develop a position that

does not lean into the narrative that AI is a race that must be won at all costs, but one that prioritises public value, community needs and democratic accountability, rather than pure market logic or centralised state control.

This paper comes from the professional community of the [common European data space for cultural heritage](#), including the Europeana Initiative as steward of this data space. It reflects discussions from the [Alignment Assembly on Culture for AI](#) – a collective intelligence exercise that has engaged over 400 professionals since May 2025 to this date. It is primarily written for the European cultural heritage sector. And while it reflects the perspectives of the data space community, it also articulates a shared position for the wider sector. In doing so, it aims to contribute in concrete, operational ways to a Public AI future in Europe.

# 1. AI AND THE REORDERING OF KNOWLEDGE, CULTURE AND POWER

AI is not new to the cultural heritage community. For over two decades, libraries, museums and archives have developed and applied domain-specific machine learning – ranging from metadata enrichment to speech-to-text, and from image recognition to handwritten text and optical character recognition. What is changing is the scale, speed and scope of AI, as well as its societal reach, made possible by the development of Large Language Models (LLMs) and generative AI.

AI has become a pervasive socio-cultural technology, reshaping how knowledge, culture and history are produced, accessed and interpreted. AI tools increasingly mediate meaning, drawing on the shared

knowledge and cultural production of society. AI is also changing how cultural content is made visible online. Availability is no longer enough: works are increasingly discoverable through the interfaces of platforms, curation systems and algorithmic pathways that can reinforce and exacerbate platform gatekeeping, unequal visibility and focus. Therefore, AI systems must be designed to surface, recommend and make visible, cultural and linguistic diversity.<sup>1</sup>

When one in six people<sup>2</sup> uses generative AI to answer questions, translate or support decision-making, the implications of AI are no longer just technical – they are societal, cultural and political. AI models increasingly function as powerful data repositories.

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<sup>1</sup> European Commission: Directorate-General for Education, Youth, Sport and Culture, Panteia, KEA European Affairs, Vrije Universiteit Brussel, DELab – University of Warsaw, Erasmus University Rotterdam, IDEA Consult, Clarke, M., Vroonhof, P., Byrne, C., Petrov, L., Le Gall, A., Antonucci, F., Albertelli, A., Rolando, E., Ranaivoson, H., Salganik, R., Wiratama, V., Afilipoaie, A., Hardy, W., Paliński, M., Rožynek, S., Berkers, P., Calkins, T., Wijngaarden, Y., Vuijsteke, C., Valintelyte, E.Janssens, J., Study on the discoverability of diverse European cultural content in the digital environment – Final report, Publications Office of the European Union, 2026, <https://data.europa.eu/doi/10.2766/8868773>

<sup>2</sup> Microsoft AI Economy Institute: [Global AI Adoption in 2025—A Widening Digital Divide](#).



*Tobacco workers in the 1950s - 1950  
Municipality of Thasos, Greece - CC BY.*

A recently published report tells the story: 2025 saw an 8% drop in human traffic to Wikipedia alongside a 50% surge in bot activity.<sup>3</sup> AI is not merely consuming or reading Wikipedia content – it might be replacing it as an interface to knowledge.

This raises urgent questions about the knowledge that AI systems are trained on, under what conditions, and in whose interest. The institutions that steward cultural memory cannot remain neutral observers. They must decide whether to adapt to infrastructures designed elsewhere, or to actively shape how these infrastructures operate. Engaging with AI is not simply a question of technological adoption: it is about institutional positioning, democratic responsibility and the safeguarding of long-term cultural sovereignty.

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<sup>3</sup> Wikimedia, IMD, Open Future: [Collective Intelligence vs Artificial Intelligence](#).

## 1.1 *The sectoral context*



### ***Building our sector's AI confidence: the Alignment Assembly on Culture for AI***

The cultural heritage community has never been a passive observer of digital change; it has actively built infrastructures, standards and tools grounded in public values, often setting an example beyond its own field.<sup>4</sup> Today, the sector is similarly challenged to take a clear, shared stance in engaging with and shaping AI.

As a first step, the common European data space for

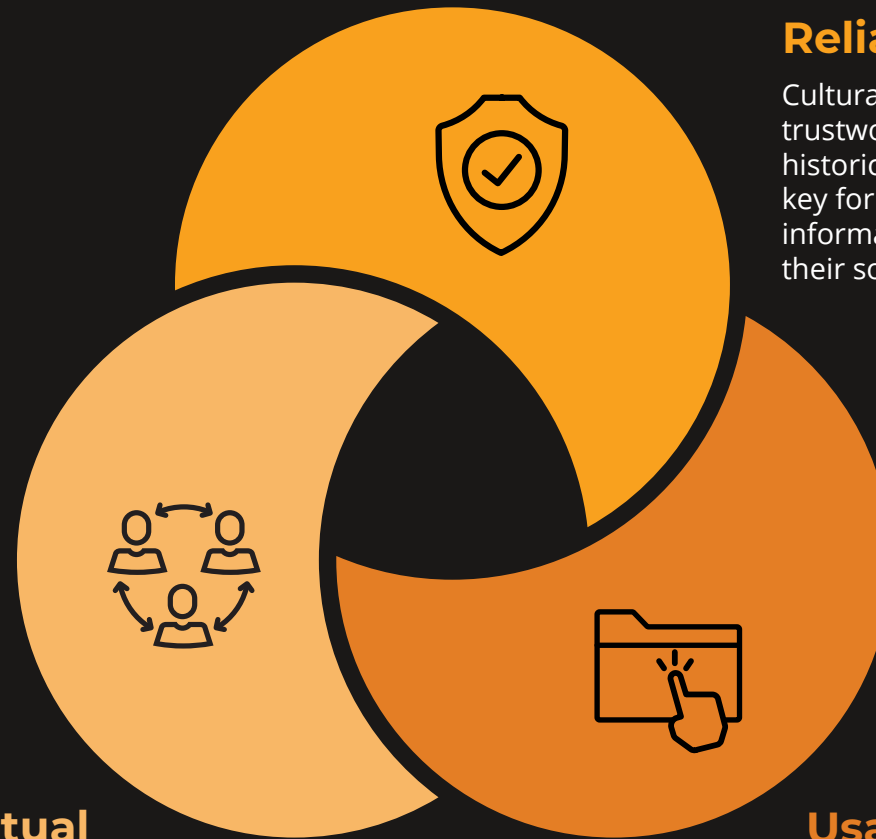
cultural heritage launched the Alignment Assembly on Culture for AI,<sup>5</sup> a collective intelligence exercise that has engaged more than 400 professionals since May 2025. Its [first insights](#), published in October 2025, mapped areas of consensus, friction and uncertainty across the sector, while also identifying priorities for further collective work.

The Assembly showed that the sector aims to actively shape a fairer and healthier information ecosystem, building on its expertise and values, while at the same time managing risks. This paper supports that vision and puts forward a clear proposition: in the age of AI, the cultural heritage sector should become an active force that both safeguards public values and shapes future opportunities.

<sup>4</sup>This includes contributions such as developing technical standards like IIF or promoting Creative Commons licences.

<sup>5</sup> The Alignment Assembly gathers insights and feedback from the cultural heritage professional community via dedicated touchpoints. These include an online positionality survey via polis.eu, followed by several online and physical gatherings: the Europeana Network Association (ENA) cross-community workshop on Culture for AI held in Copenhagen (October 2025), the AI4LAM Fantastic Futures conference (December 2025), consultations with the ENA Members Council and Europeana Aggregators' Forum (November 2025 and March 2026), plus consultations on the development of the white paper itself.

## *A cultural heritage perspective on usable, mutual and reliable AI*



### **Reliable**

Cultural heritage data can offer traceability, trustworthiness, contextualisation and historically grounded knowledge. This is key for AI systems to provide provenance information, making outputs traceable to their source and context.

### **Mutual**

Data governance must ensure that data use generates collective benefit, respects the authority of communities and institutions to shape how data is used, and is grounded in responsibility and ethical care.

### **Usable**

Cultural heritage content and metadata must be accessible, interoperable and sufficiently well documented to support meaningful reuse – including for AI development, in line with FAIR principles.

## ***A cultural heritage perspective on usable, mutual and reliable AI***

To do this, the sector must set clear boundaries and conditions for how cultural heritage data can be used in AI. These rules should prevent data from being absorbed into AI systems that are opaque, extractive, misaligned with our sector's values, or that give nothing back to the public institutions that steward it. The sector must also proactively engage with AI to unlock new forms of access, participation and societal value. This engagement should be guided by the sector's public-interest mission and values, while remaining respectful of rights and wishes of the creators whose creations they preserve, and implementing regulatory frameworks.

Europeana and the data space are built on three values: usable, mutual and reliable. In the age of AI,

mutuality is particularly under pressure, as cultural heritage data is being reused at scale without sufficient reciprocity.



Growing requests from AI bots seeking access to cultural heritage data show its increased relevance and strategic importance in the AI ecosystem. Europeana and the data space support cultural heritage institutions in opening up heritage collections for new forms of reuse – including for AI development. Usability means ensuring that content and metadata are accessible, interoperable and sufficiently well documented to support meaningful reuse, in line with FAIR (Findable, Accessible, Interoperable, and Reusable) principles. This is essential to foster innovation, but also to build AI

systems that are more diverse, representative and context-aware.

This shift in the reuse landscape creates new pressures. As shown in the Alignment Assembly, openness can be experienced as a loss of control by cultural heritage institutions, even when it serves the public interest. For many, the challenge is no longer whether reuse should happen, but how to sustain open and usable access under these changing conditions. This includes the practical costs of maintaining infrastructures, improving data quality, expanding digitisation and ensuring that more collections can be reused meaningfully.



## Mutual

Cultural heritage institutions – largely publicly funded – share knowledge and infrastructures to serve the

public interest and, in doing so, create further public value. This is fully aligned with the CARE principles (Collective Benefit, Authority to Control, Responsibility and Ethics), which remind us that data governance must go beyond access and reuse: it must ensure that data use generates collective benefit, respects the authority of communities and institutions to shape how data is used, and is grounded in responsibility and ethical care. In itself, the wide reuse of cultural heritage data is not the problem: these institutions preserve and share collections they look after because of their public mission, not because they expect compensation. The problem arises when this relationship becomes extractive rather than reciprocal, depleting infrastructures that cannot sustain both traditional users and AI bots.

Today's information ecosystem is increasingly dominated by a small number of private actors that benefit from open access to information without

contributing back in ways that sustain the commons from which they draw. Openness without reciprocity can reinforce existing concentration of power, undermining the principles of collaboration and shared benefit that have traditionally shaped the open knowledge ecosystem.

Some generative AI companies rely on large-scale scraping, drawing on resources that cultural heritage institutions have built over decades through public investment, without sharing back the value generated. Instead, publicly funded institutions bear the costs of server strain, infrastructure pressure, defensive technical measures, legal uncertainty and reputational risks linked to the reuse of the collections they look after. The outcome is a structural imbalance, with public institutions bearing responsibilities and costs while private entities benefit disproportionately. This not only poses a risk to institutions' ability to provide a robust public

service, but also suggests a new reality: AI systems have emerged as a significant audience for public knowledge infrastructures, and supporting this audience demands specific funding and support.



## Reliable

At a time of increased misinformation and declining trust, cultural heritage data can offer traceability, trustworthiness, contextualisation and historically grounded knowledge. This can delegitimise AI systems that do not provide provenance information traceable to the source and its context.

At the same time, the provision of reliable cultural heritage data for AI has its own challenges. Cultural heritage institutions do not always have complete certainty about the accuracy and provenance of their digital collections or their metadata. Nor are

they neutral: digitisation, collection and cataloguing practices reflect historical and present-day power structures, biases and gaps.<sup>6</sup> AI trained on currently available data can reinforce these inequalities in its outputs, turning historic silences and biased descriptions into machine-readable ‘facts’. These limitations show that cultural heritage institutions are not infallible – yet thanks to their expertise and public mission, they are well equipped to identify gaps and address bias, contributing to more trustworthy and inclusive digital knowledge infrastructures.

Taken together, these dynamics show why the values embodied by ‘usable,’ ‘mutual’ and ‘reliable’ matter not only for how the sector adopts AI, but also for how it helps shape the wider AI ecosystem.

*“The cultural heritage sector should develop its own narratives about AI, ones that are grounded in our values rather than focused merely on efficiency and commercial gains.”*

**Statement from the Alignment Assembly**

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<sup>6</sup>Taes, S., Truyen, F., Da Milano, C., Herlt, K., Rose, K., & Welter, J. (2024). Representing diversity in metadata: Recommendations and implementation strategy for cultural heritage institutions and professionals.

## *A reciprocal relationship: AI for Culture, Culture for AI*

AI can serve cultural heritage institutions and their activities (AI for Culture), and the cultural heritage sector can, in turn, shape AI and how it is used (Culture for AI).

### **AI for Culture**

The benefits and diverse applications of AI in the cultural heritage sector have been widely charted.<sup>7</sup> AI tools can support annotation, classification, curation, enrichment and discovery of collections at scale. They can enable professionals to work more effectively with increasingly large and complex digital corpora. They can facilitate accessibility of physical and online



*Dievčatá v Brezovej by Socháň, Pavol  
Slovak national gallery, Slovakia - Public Domain.*

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<sup>7</sup>See, for example, Münster, S.; Maiwald, F.; di Lenardo, I.; Henriksson, J.; Isaac, A.; Graf, M.M.; Beck, C.; Oomen, J. Artificial Intelligence for Digital Heritage Innovation: Setting up a R&D Agenda for Europe. *Heritage* 2024, 7, 794-816. <https://doi.org/10.3390/heritage7020038>

collections. They can enhance collection management processes, from deduplication and quality control to rights statements management and the detection of sensitive or harmful language in legacy metadata. Ultimately, they can build capacity within cultural heritage institutions.

When integrated thoughtfully into workflows, these tools do not replace professional judgement; they augment it, allowing practitioners to focus on contextualisation, interpretation and public engagement. Our sector has a long history in responsible AI integration and experimentation – including by initiatives such as EuropeanaTech, AI4LAM<sup>8</sup>, AI4Culture<sup>9</sup>, Transkribus<sup>10</sup> and projects led by national libraries, museums and archives.

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<sup>8</sup> <https://ai4lam.org/>.

<sup>9</sup> <https://ai4culture.eu/>.

<sup>10</sup> <https://www.transkribus.org/about/members.>

## Culture for AI

The concept of ‘Culture for AI’ reflects the role cultural heritage institutions can play in shaping a fairer AI ecosystem for the public interest. This paper identifies four major contributions. The first one lies in the data layer. Cultural heritage institutions steward a strategic resource: vast, curated and multilingual collections. These are diverse, well documented and come with a wealth of contextual knowledge. If AI systems are trained on this high-quality data, the sector can directly influence their veracity, representativeness and provenance-based application. Although cultural heritage data is already used to train AI, it is still underrepresented in many training datasets.

The sector has much more to offer AI than data alone. A second contribution is its long-established practice of managing data access and reuse in fair and reciprocal ways: contributing norms and governance principles designed with the public interest and democratic accountability in mind, fully in line with the FAIR and CARE principles which our sector aims to uphold.

Thirdly, cultural heritage professionals should shape smaller, specialised AI models<sup>11</sup> tailored to the cultural heritage sector, rather than being reduced to sources of training data. These models can be more pluralistic, publicly oriented, and better aligned with the goals of education, research and cultural access,<sup>12</sup> while enhancing the sector's capacity and autonomy.

Finally, a fourth contribution is to help citizens understand and critically engage with AI, supporting informed participation, critical reflection and democratic resilience. Cultural heritage institutions can support Public AI literacy across institutions and society through exhibitions, educational programmes, public events and digital engagement.

*'This crucial dimension of libraries' AI strategy remains largely under the radar – yet it is precisely where they should lead. After making metadata machine-readable, collections accessible online, and data interoperable via APIs, the next step is clear: make data and metadata AI-ready within an open, shared corpus!'*

**Sebastian Majstorovic, Data Consultant and Digital Historian, in the context of the Alignment Assembly**

<sup>11</sup> [Small AI initiatives - a collective mapping.](#)

<sup>12</sup> Brewster Kahle, American digital librarian and founder of the [Internet Archive](#), in *AI Tools, Not Gods. Why Artificial Intelligence Hype Threatens Global Governance-and How to Fix It* by Caroline de Cock.



*Morón Artisan Lime by Project Leader: Manuel Gil Ortiz  
European Heritage Awards Archive, Austria - Public*

## 1.2 Europe's strategic context

Today's global geoeconomic landscape is dominated by a few powerful private companies which control the infrastructure most others rely on. Publicly available data is often used by these companies in extractive or harmful ways, and sometimes even illegally. Safeguards to ensure private actors use open and public data responsibly are lacking. Instead, the prevailing trend favours extracting value without reinvesting or protecting the long-term sustainability of knowledge production – it lacks mutuality.<sup>13</sup>

To reduce dependence on non-European tech giants, in 2025 the European Commission launched

the AI Continent Action Plan,<sup>14</sup> backed by about €200 billion of public and private investment. With this, the EU aims to become a global AI leader while upholding a distinctive European approach to AI: trustworthy, human-centric and a 'force for good'.<sup>15</sup> The Plan is complemented by the [Apply AI Strategy](#), which commits the EU to developing Frontier AI models<sup>16</sup> – creating an opportunity for human-centred models based on public principles that serve diverse communities.

While the AI Continent Action Plan is a significant step forward, it still lacks a clear vision for AI in the public

<sup>13</sup> Alek Tarkowski, Zuzanna Warso (2024). Commons-based data set governance for AI. Open Future Foundation. [https://openfuture.eu/wp-content/uploads/2024/03/240325\\_Commons\\_Based\\_Data\\_Set\\_Governance\\_for\\_AI.pdf](https://openfuture.eu/wp-content/uploads/2024/03/240325_Commons_Based_Data_Set_Governance_for_AI.pdf).

<sup>14</sup> [AI Continent Action Plan](#) (2025). Communication from the Commission to the Parliament, Council, Economic and Social Committee and Committee of the Regions.

<sup>15</sup> At the AI Summit in Paris, see [https://ec.europa.eu/commission/presscorner/detail/lt/speech\\_25\\_471](https://ec.europa.eu/commission/presscorner/detail/lt/speech_25_471).

<sup>16</sup> Frontier AI models are understood as the most advanced and cutting-edge artificial intelligence systems currently in development or use.

interest,<sup>17</sup> which our sector is well positioned to advocate for. In addition, the emerging AI ecosystem – including data spaces, data factories, data labs and EU-funded LLM spin-offs – remains fragmented and uncoordinated.<sup>18</sup> Finally, it prioritises large-scale and general-purpose models, overlooking the potential for more targeted, sector-specific investment in priority areas such as cultural heritage.

## *The data space in Europe's AI ecosystem*

Alongside a broader AI infrastructure, which includes AI factories,<sup>19</sup> data labs and AI giga-factories,<sup>20</sup> data spaces that provide access to high-quality data for AI use are a key component of the AI Continent Action Plan.

In the case of the common European data space for cultural heritage, it is clear to see why. The data space already provides access to high-quality, well-documented, multilingual and trusted data, and its professional community maintains and continuously expands the contextual knowledge around it. The

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<sup>17</sup>This concern is echoed in Public AI scholarship and European digital policy debates, which caution that, without explicit public-value governance, major investments in computation, data and deployment may end up reproducing rather than reshaping the current concentration of power in the AI ecosystem. See '[From AI Factories to Public Value: What's Missing in the AI Continent Action Plan?](#)' (2025), an Opinion piece by Alek Tarkowski for Open Future Foundation and Amba Kak, Sarah Myers West, Leevi Saari, and Frederike Kaltheuner, Redirecting Europe's AI Industrial Policy: From Competitiveness to Public Interest (New York: AI Now Institute, 2024).

<sup>18</sup>Open Future: [Who Controls Europe's AI Future? How the Gigafactories Bet Shapes the EU's AI Trajectory](#).

<sup>19</sup>AI factories use the supercomputing resources of the EuroHPC Joint Undertaking to develop trustworthy cutting-edge generative AI models. Currently there are 19 AI Factories across 16 Member States – supported by €2.6 billion in investment. AI factories will connect AI-optimised supercomputing capacity, high-quality data resources, research institutions and industry to drive innovation across strategic sectors.

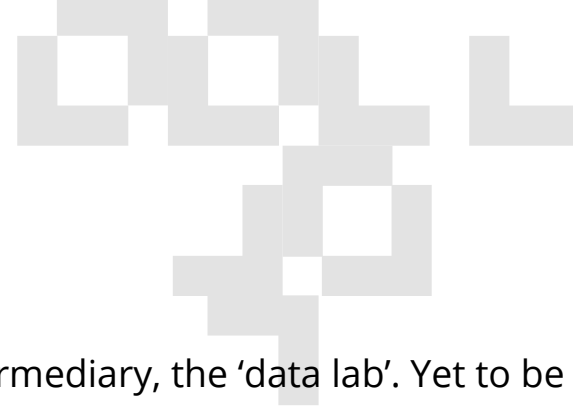
<sup>20</sup>Public-private facilities designed to train next-generation AI models at unprecedented scale, with planned investments of €3–5 billion per site – aimed at strengthening Europe's sovereign computing capacity and strategic autonomy in critical technologies.

high value of cultural heritage data for AI use is explicitly recognised in the [Data Union Strategy](#), which sets the ambitious target of making available 30 million digitised cultural objects for AI by the end of 2026. Reaching this goal will require strategic partnerships, EU support and additional investment in high-quality digitisation at Member State level.

The data space already provides a robust framework for managing diverse copyright statuses, enabling clear distinctions between three categories of materials relevant for AI use: 1) materials that are in the public domain; 2) materials that have been openly licensed; and 3) copyright-protected materials. While the first two categories are well suited for AI use, cultural heritage institutions should be careful about possible rights reservation by rightsholders in the third one. For materials that fall under the



*foto. Töölised metallipressiga.  
Pärnu Museum, Estonia - CC0.*



first two categories, the sector must act as a reliable steward, leveraging the data space to ensure such works are governed by public values rather than left to the default logic of private gain.

The data space can use its position in the broader AI ecosystem to partner with actors working with cultural heritage data and ensure that collaboration follows principles of transparency, reciprocity and the public interest, with respect to the creators, rightsholders and existing regulatory frameworks. Some AI factories explicitly include culture and language within their remit, and the data space is already forging connections with them – including those in Finland, Greece, Italy, Luxembourg, Poland and Spain.<sup>21</sup>

In practice, the data space can share cultural heritage data with AI factories through a dedicated

intermediary, the ‘data lab’. Yet to be established, data labs will act as bridges between data holders and AI infrastructure. Via data labs, the data space can provide pre-packaged data and metadata – such as curated, legally cleared, referenced and catalogued datasets – to AI factories for LLM training and specific use cases, in exchange for computing power, model development and expertise. In this way, the data space can act as a first mover among existing data spaces by aggregating and pre-packaging cultural data for reuse in AI factories. What’s more, the data space would define the standards and practices under which data can be reused – from curation to data sovereignty and access control, as well as contractual legal precedence. Through these connections, the data space for cultural heritage will support a European AI approach that is traceable and sovereign.

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<sup>21</sup> LUMI in Finland, PHAROS in Greece, IT4LIA in Italy, LAIF in Luxembourg, PIAST-AI in Poland and BSC in Spain.

These partnerships will be key to advance the ambitions of the Data Union Strategy and to show how cultural heritage data made available through the data space can be a key element of Europe's sovereign AI data supply chain. This work should not be understood as a one-way channel for data provision, but as part of a reciprocal ecosystem in which the data space helps shape the values and conditions under which AI infrastructures are developed and used. This includes being transparent about data use, making attribution where possible, supporting open infrastructures and sharing governance measures.

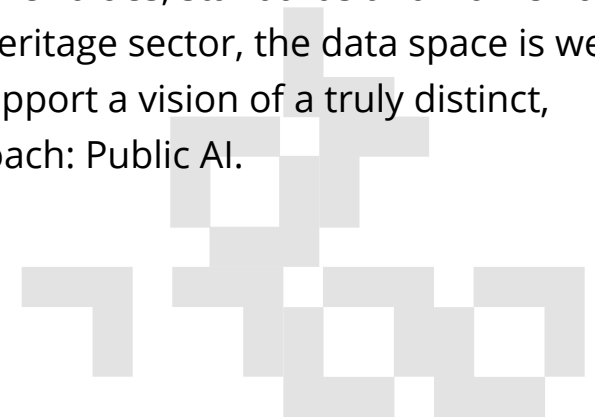
The data space offers many other ways to shape and support the application and development of AI in Europe. For instance, by improving linguistic diversity and representation. The European Union has 24 official languages, yet many of these languages

represent less than 0.6% of web content.<sup>22</sup> If AI systems continue to rely mainly on English, they will reflect an incomplete view of the world, sidelining Europe's linguistic and cultural diversity. Data from the data space can help close these representation gaps by prioritising multilingual and diverse materials, while also making data limitations clear to users and developers. The data space can also advocate for digitisation funding to ensure a more pluralistic and representative data foundation for AI in Europe.

Ultimately, by providing high-quality datasets at scale for AI development and acting as a testing ground which upholds the values, standards and frameworks of the cultural heritage sector, the data space is well positioned to support a vision of a truly distinct, European approach: Public AI.

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<sup>22</sup> [Unlocking data to advance European commerce and culture](#) (2025). Brad Smith. Microsoft



## 2. OUR VISION: PUBLIC AI

Against the wider contexts outlined in Section 1, we propose the cultural heritage sector championing Public AI as a response to two linked challenges: the growing role of AI systems as mediators of knowledge and culture, and the concentration of AI power in a handful of non-European private companies.

### 2.1 *Defining Public AI*

Public AI refers to an AI ecosystem and governance model where systems possess public attributes, public functions and public control (see table).<sup>23</sup>

#### Public control

Implementing governance measures that ensure democratic accountability and long-term sustainability of the infrastructures underpinning AI systems.

#### Public attributes

Prioritising accessibility, openness and interoperability.

#### Public functions

Serving societal needs such as knowledge sharing, cultural participation and civic engagement.

<sup>23</sup> The source for the content in the table is: Sieker/Tarkowski/Gimpel/Osborne (2025). Public AI – White Paper. Bertelsmann Stiftung. Gütersloh. [https://www.bertelsmann-stiftung.de/fileadmin/files/BSt/Publikationen/GrauePublikationen/Public\\_AI\\_2025\\_final2.pdf](https://www.bertelsmann-stiftung.de/fileadmin/files/BSt/Publikationen/GrauePublikationen/Public_AI_2025_final2.pdf).

Taken together, these dimensions distinguish Public AI from privately controlled systems, offering a more democratic, pluralistic and publicly accountable alternative ecosystem. Public AI seeks fairness not only within AI systems themselves, but across the wider ecosystem of data stewardship, infrastructure and access.

It is important to distinguish Public AI from adjacent concepts. Unlike 'sovereign AI', which focuses on national competitiveness and may reproduce commercial priorities under state direction, Public AI is oriented towards democratic accountability and international cooperation. Unlike 'open-source AI' alone, which addresses openness at the model level, Public AI encompasses the full stack – compute, data, models, and applications – and emphasises governance alongside access. Unlike 'ethical AI', which

typically focuses on mitigating harms within existing commercial structures, Public AI questions those structures and proposes institutional alternatives.



## ***Why Public AI is gaining momentum***

In parallel with the discussions within the Alignment Assembly, interest in Public AI has grown, particularly across the public sector. The [India AI Impact Summit](#) in February 2026 showed a growing appetite for Public AI as a means for greater autonomy over data and reduced dependence on a handful of dominant players.

The cultural heritage sector forms part of a broader public knowledge ecosystem, alongside public service media, publishing, education, research and public sector information. Cultural heritage is not the only sector facing pressures from AI; other public-interest knowledge institutions are confronting similar questions about how their data and resources are reused, by whom and on what terms. Public AI should be understood not as a sectoral shelter for heritage, but as a coalition framework for institutions that

produce and steward public knowledge. At the same time, Public AI can coexist with private initiatives. In Europe, however, this direction is not yet clearly defined or firmly embedded in EU policymaking.

The analogy to public service media is instructive here: just as public broadcasters were established to ensure that access to information was not left solely to commercial interests, Public AI addresses the risk that access to knowledge and culture could be shaped entirely by systems optimised for private gain. This perspective reflects the view that AI systems are inherently public technologies, as they build on knowledge and cultural resources collectively.

## ***Environmentally sustainable Public AI***

In line with the [EU AI Act](#), we acknowledge that AI applications also pose risks to the environment. On this basis, Public AI must also be environmentally sustainable. As AI infrastructure expands across Europe and globally, environmental sustainability must be recognised as a core dimension of Public AI governance rather than a secondary concern. The cultural heritage sector's long-standing commitment to stewardship should extend to the physical impacts of AI systems and infrastructures. This means supporting approaches to AI that are proportionate, transparent and resource-aware. Rather than reinforcing a model based solely on ever-larger and more energy-intensive systems, the cultural heritage sector can help promote alternatives grounded in high-quality, curated and contextualised data. Smaller, domain-relevant and purpose-specific models, combined with trusted cultural

datasets, can often deliver more accountable and meaningful outcomes while requiring significantly fewer computational resources. The sector is also well positioned to advocate for AI systems that align cultural value with ecological responsibility. This includes supporting energy-efficient model design, sustainable digital infrastructures, transparency around environmental costs and procurement practices that take long-term environmental impact into account.



## Four ways cultural institutions strengthen Public AI

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**1**

**Provide high-quality data and the knowledge needed to keep it traceable, interpretable and reliable.**

In doing so, cultural heritage institutions help make AI outputs more robust, contextualised and open to scrutiny.

**2**

**Manage data access and reuse in fair and reciprocal ways.**

Cultural heritage institutions are reliable intermediaries and should influence the way cultural information is accessed and reused by AI developers and assist in avoiding value extraction without reciprocity and infrastructure depletion.

**3**

**Shape how smaller, domain-relevant AI systems are developed and used.**


This includes helping to shape the governance of their development and deployment, ensuring that AI remains transparent, contestable and aligned with democratic values.

**4**

**Strengthen public AI literacy across institutions and society.**

Institutions must upskill professionals while helping audiences understand how AI works and engage critically with AI systems they encounter.

## 2.2 How cultural heritage can help shape Public AI in practice



Public AI offers a future where access to, and the use of, information is equitable, and it is in the best interest of the cultural heritage sector to make such a future a reality. We identify four distinctive contributions that cultural heritage institutions can make to Public AI which build on their public mission, expertise and long-term stewardship of cultural memory.

Together, these four contributions align with Public AI's characteristics of public attributes, public functions and public control. Reinforced by EU policy, the data space can empower the sector across these four areas through coordination, shared

*'If Public AI needs an institutional foundation, then Europeana and Europe's cultural heritage institutions are uniquely positioned to take up this role.'*

Open Future

infrastructure, standards, governance and capacity building. It can also provide the bridge for the cultural heritage sector to connect with a broader ecosystem of high-quality, well-governed data, including public sector information, scientific and educational resources, linguistic data, media and community-held knowledge.

The following sections set out this vision in more detail, showing both what cultural heritage institutions can contribute to Public AI and what enabling role the data space must play to make those contributions realistic, coordinated and sustainable.

## ***1. Provide authoritative access to high-quality data and the knowledge infrastructure needed to keep it traceable, interpretable and reliable***

### **The vision**

Cultural heritage institutions can contribute to Public AI by providing authoritative access to Europe's cultural heritage data. This includes through their high-quality, diverse and multilingual data, but also by providing the contextual knowledge infrastructure that makes this data interpretable, traceable and accountable.

AI systems can interact with cultural heritage data in several ways: as grounding data to improve relevance and accuracy; as reference input enabling style transfer or for generating new, derivative outputs;

or as material to be directly summarised, compared or analysed.<sup>24</sup> Cultural heritage data is particularly valuable for these activities because, as opposed to general web data,<sup>25</sup> it is curated, authoritative and contextualised. Take books, for example. Books provide long, carefully edited text that helps AI models understand complex arguments and narratives. They are usually more coherent, reliable and well documented than most online content, and are among the most valuable training data, offering greater utility per token than web, social media or research databases.<sup>26</sup>

At the same time, some cultural heritage data reflects unequal collecting and digitisation priorities,

shaped by colonial extraction and institutional taxonomies that privilege certain worldviews.<sup>27</sup> Making data available for AI training and use should therefore include checking for bias, reviewing and contextualising harmful or contentious language, using inclusive descriptions and involving communities in decisions about how their heritage is described and used. Cultural heritage institutions also hold information from indigenous peoples, whose traditions regarding the use of their heritage must be respected, in line with CARE principles. The cultural heritage sector has experience in such work; the EU-funded DE-BIAS project,<sup>28</sup> for instance, developed an AI tool that detects and contextualises harmful language in cultural heritage metadata

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<sup>24</sup> Impulse paper 'Publishing cultural heritage in the age of AI', commissioned by the Europeana Foundation to the Open Future Foundation, as part of and a contribution to the ongoing Alignment Assembly.

<sup>25</sup> See note 24 .

<sup>26</sup> In 2026, US court filings revealed that internal anthropic strategy materials identified books as the most valuable training data. See *Inside an AI start-up's plan to scan and dispose of millions of books* (2026), Aaron Schaffer, Will Oremus and Nitasha Tiku, The Wall Street Journal.

<sup>27</sup> Miles, Rachel S., Alana Osbourne, Eleni Tzialli & Esther Captain, editors. *Inward Outward, Critical Archival Engagements with Sounds and Films of Coloniality: A Publication of the 2020 Inward Outward Symposium*. Hilversum, Inward Outward, 2020. DOI: <https://doi.org/10.18146/inout2020>.

<sup>28</sup> <https://pro.europeana.eu/project/de-bias>.




*The Artist Jeanna Bauck by Bertha Wegmann - 1881  
Nationalmuseum Sweden, Sweden - Public Domain.*

using a multilingual vocabulary co-created with cultural heritage professionals and marginalised communities.

Beyond data itself, cultural heritage institutions provide a 'knowledge infrastructure' through their institutional practices of preserving meaning and evidential authenticity over time.<sup>29</sup> This authenticity should be a design requirement for any (Public) AI system, and cultural heritage professionals bring long-standing expertise to support the design of tools for the sector and beyond. This includes maintaining context integrity, provenance, collection structures, persistent identifiers, curatorial interpretation and 'what we know about what we know'.<sup>30</sup> Given the propensity of generative AI to produce false or misleading information, this is more relevant than

<sup>29</sup> [https://pro.europeana.eu/files/Europeana\\_Professional/Publications/251202PublishingCulturalHeritageDataInTheAgeOfAI.pdf](https://pro.europeana.eu/files/Europeana_Professional/Publications/251202PublishingCulturalHeritageDataInTheAgeOfAI.pdf).

<sup>30</sup> Bowker, G.C. and Star, S.L. 1999. *Sorting Things Out: Classification and Its Consequences*. MIT Press, Cambridge, MA, USA.



ever. Narrative and discursive metadata are also key to surface nuance, silences, power relations and potential harm in historical records. Professional heritage communities acknowledge these principles must remain readable by both humans and machines.<sup>31</sup>

Understanding of context and accountability is also important for system design. Retrieval-Augmented Generation (RAG) is particularly relevant here because it operationalises context integrity through the way cultural heritage collections are structured, described and maintained. Rather than relying only on model knowledge, RAG systems retrieve information from curated collections and their associated metadata, provenance records, persistent identifiers and curatorial interpretation, and then

generate responses grounded in that material.<sup>32</sup> This is precisely where cultural heritage institutions play a structural role: by preserving and documenting collections in ways that make them retrievable, interpretable and traceable over time. In doing so, they can reduce hallucinations, anchor outputs in documented holdings and enable users to trace responses back to sources.

## **The enabler role of the data space**

Through metadata frameworks, persistent identifiers, provenance standards and documentation, and context-rich APIs, the data space helps cultural heritage institutions to uphold the contextual and evidential integrity of the data they share, and to keep what is generated and retrievable aligned with

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<sup>31</sup> Colavizza, Giovanni, and Lise Jaillant. *AI Preparedness Guidelines for Archivists*. February 2026. Archives & Records Association (UK & Ireland).

<sup>32</sup> When it comes to a RAG approach, like other directions foreseen in this paper, e.g. ones that encourage access to high-quality data – can also be depletive, as more requests would end up hitting cultural institutions' servers. This paper assumes that institutions across the sector can develop and adopt protective measures to serve the uses they want to encourage, while discouraging others. One can argue this assumption is debatable, but we are precisely interested in raising the point and encouraging the community to discuss it.

<sup>33</sup> Write it Down! Fostering Responsible Reuse of Cultural Heritage Data with Interoperable Dataset Descriptions, <https://zenodo.org/records/17725565>.

established governance constraints.

A specific instrument for this is 'datasheets' or 'data envelopes':<sup>33</sup> metadata that describe heritage datasets including access conditions and recommendations, alongside the context of their production and any potential biases. The guidelines and tools developed by the CommonsDB<sup>34</sup> and DE-BIAS<sup>35</sup> projects demonstrate that our sector can provide data to AI systems while ensuring these are informed about, and encouraged to respect, access conditions and sensitivity rules.

This requires improving documentation practices and strengthening collection-level context so that provenance and curatorial interpretation remain legible to both humans and machines.

Here, the data space can build on its existing work on Linked Data and Knowledge Graphs, which already help institutions publish semantically and linguistically richer metadata. The Europeana Aggregators' Forum helps coordinate and align standards, technical practice and strategy across aggregators and institutions contributing data to the data space. By doing so, it strengthens the public attributes and public control needed for a more accountable Public AI ecosystem.

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<sup>34</sup>The CommonsDB project also offers insights into how contextual integrity can be operationalised at an infrastructure level. Its feasibility study outlines a production trust model combining qualified trust services, verifiable credentials and per-declaration digital signatures, helping to keep provenance traceable and accountability with data suppliers who hold the relevant contextual knowledge. See for more: <https://www.commonbdb.org/>.

<sup>35</sup><https://pro.europeana.eu/project/de-bias>.

## ***2. Manage data access and reuse in fair and reciprocal ways***

### **The vision**

Conversations about AI often treat data as a raw input to be extracted, scaled and commodified. To access cultural heritage data, AI companies either scrape publicly available content online or approach cultural heritage institutions individually, offering services in exchange for data.<sup>36</sup> As AI drives demand for collection-level access at industrial scale, the most strategic position for cultural heritage institutions is that of data steward: a trusted intermediary that shapes how cultural data is accessed, interpreted and reused. By playing this role, cultural heritage institutions support the public functions of Public AI.

Data stewardship is not only about maintaining the authenticity and integrity of data. It is also about shaping the conditions of access and reuse so that data remains aligned with the public-interest mission of cultural heritage institutions. Responsible data stewardship requires institutions to recognise that the collections they care for are rooted in communities whose histories are often diverse, contested or shaped by exclusion. This means involving communities of origin, and those represented in the data, in decisions about dataset design, collection description, interpretation, preservation and access. Such stewardship requires transparency about provenance, dialogue on restitution or return, and shared decision-making, particularly where collections reflect colonial, indigenous, diasporic or otherwise marginalised histories. Standards such as the IEEE Recommended

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<sup>36</sup> Ranging from hosting capabilities and digitisation of collections to providing access to AI tools.

Practice for Provenance of Indigenous Peoples' Data<sup>37</sup> recognise that communities must remain visible and authoritative in the data used for AI to reduce risks of reproducing inherited biases.<sup>38</sup>

Responsible data stewardship must also be grounded in a strong commitment to fundamental rights, inclusive participation and trustworthy data practices. In line with the United Nations Convention on the Rights of Persons with Disabilities (CRPD 2006),<sup>39</sup> cultural institutions have a duty to ensure that people with disabilities can access, contribute to and shape cultural life on an equal basis with others. This includes not only access to cultural content, but also meaningful participation in its creation, interpretation, and governance. Complementarily,

the European Accessibility Act (2019)<sup>40</sup> reinforces the obligation to design digital infrastructures, platforms and datasets that are accessible by default, removing barriers that hinder equitable engagement. These commitments are closely aligned with the Ethics Guidelines for Trustworthy Artificial Intelligence (2019)<sup>41</sup> by the High-Level Expert Group on AI, which provides a foundation for building trustworthy, transparent and reusable cultural data ecosystems in the age of AI.

As part of this steward role, cultural heritage institutions can prevent value extraction where public data feeds private gain without reciprocity. This includes setting clear access and reuse measures and in some cases providing technical interfaces

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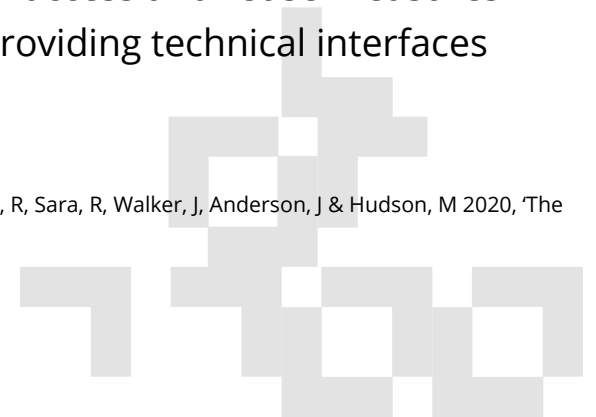
<sup>37</sup> <https://standards.ieee.org/ieee/2890/10318/>.

<sup>38</sup> Carroll, S, Garba, I, Figueroa-Rodriguez, O, Holbrook, J, Lovett, R, Materechera, S, Parsons, M, Raseroka, K, Rodriguez-Lonebear, D, Rowe, R, Sara, R, Walker, J, Anderson, J & Hudson, M 2020, 'The CAREprinciples for Indigenous data governance', Data Science Journal, vol. 19. <https://doi.org/10.5334/dsj-2020-043>.

<sup>39</sup> [un.org/disabilities/convention/](https://un.org/disabilities/convention/).

<sup>40</sup> <https://eur-lex.europa.eu/eli/dir/2019/882/oj/eng>.

<sup>41</sup> <https://digital-strategy.ec.europa.eu/en/library/ethics-guidelines-trustworthy-ai>.



that manage permissions, build on collective governance of systems (see the following section) and are enforceable at scale. Stewardship also means building infrastructure that makes rights and provenance legible at scale.<sup>42</sup> Cultural heritage institutions must have the confidence and agency to decide if, and under what conditions, their data is used for AI training.<sup>43</sup>



*A man flying in the air with wings and balloons attached to him. Coloured wood engraving. - Wellcome Collection, United Kingdom - CC BY.*

<sup>42</sup> [https://www.bertelsmann-stiftung.de/fileadmin/files/BSt/Publikationen/GrauePublikationen/Public\\_AI\\_2025.pdf](https://www.bertelsmann-stiftung.de/fileadmin/files/BSt/Publikationen/GrauePublikationen/Public_AI_2025.pdf).

<sup>43</sup> Keller, P. (2025, December). Publishing cultural heritage data in the age of AI [Impulse paper]. Commissioned by the Europeana Foundation to the Open Future Foundation, as part of and a contribution to the ongoing Alignment Assembly.

## The enabler role of the data space

The data space strategy 2025–2030<sup>44</sup> emphasises that cultural heritage institutions should remain in control of how the data they steward is accessed and reused. Within the Alignment Assembly, an initial framework has been developed to help cultural heritage institutions balance their commitment to open access and AI-driven large-scale reuse. This could enable a differentiated access model, in which openness remains the default where it serves the public interest, but additional conditions can be applied where large-scale AI reuse raises concerns around attribution, reciprocity, transparency or economic sustainability. In this way, the data space can help institutions move beyond a binary choice between

unrestricted openness and defensive restriction. This initial framework is outlined in the impulse paper ‘Publishing Cultural Heritage in the Age of AI’<sup>45</sup> and further developed through subsequent contributions and reflections by others.<sup>46</sup>

The data space helps institutions clearly define and communicate how their data is accessed and reused by developing shared approaches to provenance, permissions, reuse conditions and reciprocity. It supports the development of common tools and frameworks that make rights and source information legible at scale, while helping institutions define mission-aligned criteria for deciding if, when and under what terms data should be made available for AI use. By developing the necessary governance

<sup>44</sup> <https://www.dataspace-culturalheritage.eu/en/news/discover-the-common-european-data-space-for-cultural-heritage-Strategy-2025-2030>.

<sup>45</sup> Keller, P. (2025, December). ‘Publishing cultural heritage data in the age of AI’ [Impulse paper]. Commissioned by the Europeana Foundation to the Open Future Foundation, as part of and a contribution to the ongoing Alignment Assembly. The Impulse paper argues that decisions about access and reuse should remain aligned with the public-interest mission of cultural heritage institutions, balancing open access, non-discrimination, trustworthiness, support for research and innovation and economic sustainability. It also rests on two assumptions that are highly relevant for the data space: that most cultural heritage institutions operate under a public mandate, and that anything made publicly accessible is likely to be used by AI systems. The question, therefore, is not whether such use occurs, but under what conditions such use occurs for it to be in line with public values.

<sup>46</sup> <https://openfuture.eu/blog/beyond-control-and-compensation/>.

frameworks and enforcement mechanisms, it can help cultural heritage institutions remain open without becoming structurally vulnerable.

### ***3. Shape how smaller, domain-relevant AI systems are developed and used***

#### **The vision**

In our vision for Public AI, the cultural heritage sector should be able to shape the standards and governance principles that determine how AI is developed and deployed, and have a stronger role – together with other public institutions – in AI model development. The cultural heritage sector can fulfil these roles by supporting AI development pathways that preserve public control. This includes developing shared tools (such as APIs and registries) and supporting specialised systems which include smaller, domain-specific models. Thanks to their expertise and experience in multilinguality and public accountability, cultural heritage institutions are well placed to contribute as co-governors of research consortia building such models and tools.

Recent heritage projects show what domain-specific, stewardship-led AI looks like in practice. The previously mentioned DE-BIAS project offers an example of how cultural heritage expertise can shape AI tools<sup>47</sup> that respond responsibly to sensitive and contested language in collections. Together with other similar projects, it demonstrates that participatory and community-based approaches are essential if AI is to be genuinely usable, accountable and socially grounded.

A Public AI approach also requires close collaboration with commercial and public or research model developers to ensure the sector's norms and expertise are embedded in AI processes, products and services, and aligned with public goals and community needs. The sector has relevant and

transferable experience in leading cross-institutional consortia to develop common standards, shared tools and governance arrangements beyond the sector itself. Initiatives like IIF, Creative Commons tools and [RightsStatements.org](https://RightsStatements.org) illustrate this.

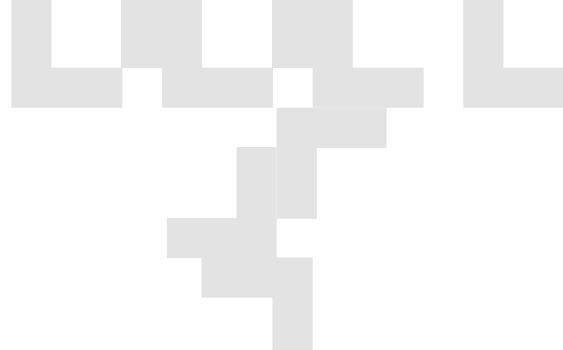
The heritage sector should also be recognised as a partner in designing and assessing domain-specific AI tools. Open-source development enables scrutiny, adaptation and accountability, yet the decisive factor remains a shared governance architecture: co-setting objectives, co-defining evaluation criteria and mechanisms for contestation and redress.

This matters particularly at the point of deployment,<sup>48</sup> where users encounter AI through interfaces, search systems, recommender systems or conversational

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<sup>47</sup> Mastromichalakis, O. M., Liartis, J., Rose, K., Isaac, A., & Stamou, G. (2025). *Don't Erase, Inform! Detecting and Contextualizing Harmful Language in Cultural Heritage Collections*. arXiv preprint arXiv:2505.24538.

<sup>48</sup> European regulation increasingly reflects this. The [AI Act](#) introduces obligations for deployers of high-risk systems, while the [Digital Services Act](#) (DSA) establishes transparency, risk assessment and audit requirements for large platforms. However, civil-society analyses of early DSA implementation, including from the European Digital Rights (EDRI) network, demonstrate that transparency alone is insufficient: governance only works when disclosures enable meaningful independent scrutiny, evaluation and enforcement.



agents. For cultural heritage institutions, deployment is not a neutral technical layer: it shapes how collections are accessed, represented and prioritised, and can create ongoing infrastructural, legal and reputational risks through continuous interaction with publicly stewarded collections.

Cultural heritage institutions should therefore help shape the governance of these systems not only in development, but also in deployment. This includes contributing to evaluation standards, documentation practices, accountability mechanisms and access and reciprocity conditions for AI systems interacting with collections. In this way, the sector can help ensure that AI systems remain transparent, contestable and aligned with public values.

## **The enabler role of the data space**

The data space can act as a hub for shared governance consortia that bring together cultural heritage institutions, researchers, public-interest technology actors and communities around specialised AI models and tools, including smaller models<sup>49</sup> designed for clearly defined tasks, domains and public functions. It can coordinate open and multilingual AI initiatives rooted in cultural expertise and public accountability. This includes promoting approaches that are appropriately scoped, transparent and resource-efficient, and helping create the practical conditions that make them viable and attractive.

In concrete terms, this means supporting pilot projects, matchmaking and common standards that

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<sup>49</sup> <https://nadiapiet.notion.site/Small-AI-Public-Research-Log-9bad029402a144a9b5a1d05bc2ee5bfd>.

connect cultural heritage institutions to relevant research groups, open-source communities and European AI infrastructures, and documenting use cases where specialised or smaller models are more appropriate or better aligned than general-purpose systems.

This should not be limited to building tools for the heritage sector alone. If AI is a cultural technology, cultural heritage institutions are well positioned to contribute to broader public-interest applications of AI by bringing their data, expertise and practices into the design and governance of these systems. The data space can support uptake by curating examples of good practice, producing guidance, enabling shared experimentation and helping institutions assess trade-offs around cost, performance, explainability, multilinguality and environmental impact. By doing so, the data space can help the sector move beyond dependency on general-purpose

commercial tools and towards a more specialised, distributed and publicly accountable AI ecosystem.

The data space can also help operationalise deployment-level governance for AI systems interacting with cultural heritage collections. This includes developing shared approaches to access conditions, traceability requirements and public-interest criteria for deployment. In parallel, it can help define reciprocity conditions for AI systems that repeatedly access publicly stewarded collections, including attribution, transparency about downstream use, contribution to infrastructure costs, or participation in shared governance arrangements. In this way, the data space can translate the public control dimension of Public AI into practical standards for deployment.

## 4. *Strengthen public AI literacy*

### **The vision**

Strengthening AI literacy is needed both within institutions and their workforces, as well as among their audiences.

For heritage professionals, this requires institution-wide capacity to understand how AI systems function and shape knowledge production, cultural interpretation, professional practice and power relations. The Alignment Assembly showed that there is no clear consensus yet on what types of skills and knowledge are essential for cultural heritage practitioners to make decisions about AI. It is clear, however, that this is not limited only to technical skills. Professionals must understand the legal, ethical and societal questions around data governance, rights management, bias, risk

assessment, procurement and partnerships.

Public AI also requires an informed and critically engaged public. Cultural heritage institutions can support their audiences in understanding how AI systems work, how they shape access to knowledge, and how cultural data is used in their development. This aligns with the long-standing public mission of these institutions; to collect, contextualise and share knowledge in ways that empower individuals and communities.

By building on decades of experience in public education and interpretation, cultural heritage institutions can strengthen Public AI literacy in many ways. Exhibitions and public programmes can demystify AI systems, making visible the data, assumptions and design choices that underpin them. Workshops and training sessions can equip

citizens with the skills to critically assess AI-generated content, understand algorithmic bias and reflect on issues of provenance and trust.

Initiatives such as Better Images of AI<sup>50</sup> demonstrate the importance of responsible communication around AI, avoiding misleading representations and fostering informed debate. Cultural heritage institutions can promote and shape these practices through their own interaction with audiences. The Deutsches Museum exhibition ‘Can AI learn to see?’<sup>51</sup> explores machine learning through interactive installations and public talks, while the Netherlands Institute for Sound & Vision and AlxDesign jointly developed the ‘Archival Images of AI Playbook: How to Create Better Images of AI through Digital Heritage’<sup>52</sup>, offering practical guidelines for sourcing archival materials to counter clichéd AI imagery.

<sup>50</sup> <https://betterimagesofai.org/images>.

<sup>51</sup> <https://www.deutsches-museum.de/en/museum-island/programme/event/can-ai-learn-to-see>.

<sup>52</sup> <https://blog.betterimagesofai.org/archival-images-of-ai-playbook/>.

## **The enabler role of the data space**

The data space can strengthen both sectoral and public-facing AI literacy. Building this capacity is essential for cultural heritage institutions to act as informed partners, critical evaluators and responsible stewards within the AI ecosystem. At the same time, this knowledge is crucial to support Public AI literacy across their audiences.

As a first step, the data space will develop a dynamic knowledge repository to consolidate insights and learnings from the Alignment Assembly, while supporting training, professional development and exchange of best and cautionary practices. The Europeana Network Association and the Europeana

Aggregators' Forum will play an important role in this effort, connecting institutions, sustaining exchange across borders and embedding AI literacy as a long-term shared priority for the sector.

The data space can also support public understanding of AI through exhibitions, workshops, learning resources and responsible communication practices. In doing so, it can help our sector position itself as a trusted intermediary in the public debate about AI.

*Roma. Arrotino ambulante by Tacchini Alvaro  
Internet Culturale, Italy - CC BY-NC-SA.*



# CONCLUSION AND NEXT STEPS

AI is becoming a dominant interface to knowledge and culture – yet the development of AI systems is in the hands of a few large private companies that are opaque and too often detached from public value. The time for action to address structural asymmetries in the AI ecosystem is now. Now more than ever, AI is putting the social contract of trust at risk. In sectors such as education and research, the use of AI without meaningful human involvement can erode the trusted relationships that sustain knowledge creation and exchange – such as those between teachers and students. Cultural heritage institutions are credible within the communities they operate in and can leverage their position and expertise to advance more trusted, accountable and pluralistic AI.

There is also a sense of urgency to our joint action. As sectoral strategies take shape and the EU defines its next long-term budget, including significant investments in AI, the cultural heritage sector must

speaking with a clear, distinct and shared voice. If our sector does not act now, the risks are manifold, and extend well beyond our sector alone.

## For AI and Europe

AI systems developed without the active contributions of the cultural heritage sector risk becoming powerful but fundamentally unreliable. While able to scale efficiently, it is at the cost of trust, nuance and evidential integrity – precisely the qualities needed for AI to serve the public interest. Equally Europe risks reinforcing current commercial AI dynamics if it does not champion a distinctly different approach grounded in the public interest. This concern is increasingly echoed in Public AI scholarship and European digital policy debates: without explicit public-value governance, the investments in computation, data and deployment may end



up reproducing rather than reshaping current concentrations of power in the AI ecosystem. If AI systems continue to rely mainly on English, they will reflect an incomplete view of the world, sidelining Europe's linguistic and cultural diversity.

*Edzésre váró gyerekek a BVSC-pályán by Hemző Károly  
(1928-2012) - 1960 - HNM-PCC Hungarian National  
Museum, Hungary - CC BY-NC-SA.*


### For the open knowledge ecosystem

The open knowledge ecosystem is already under pressure, and will be at risk without a shared framework through which public institutions – from cultural heritage to media, publishing, education, research and public sector information – can align, organise and act collectively. AI systems will continue to extract and repurpose content from public institutions without consent, redistribution of benefits, compensation or attribution, shifting the costs of infrastructure, preservation, governance and trust onto the institutions whose knowledge they exploit. This puts at risk the willingness of cultural heritage institutions to keep their data open and the sustainability of the broader ecosystem of knowledge organisations, media and other information providers.

### For cultural heritage institutions

Cultural heritage institutions continue to bear the costs of their data being extracted by opaque AI systems without consent, attribution or compensation. This will put at further risk the institutions' ability to afford to provide a robust public service and therefore jeopardise their relevance in the AI era. As AI increasingly determines what users see and engage with, the visibility and diversity of cultural content will also be at risk.





The cultural heritage sector must use its knowledge and experience, practices and values to promote and develop Public AI – starting with the common European data space for cultural heritage. The Alignment Assembly has shown both the urgency for action and the sector’s wish for a distinctive contribution, as well as the role the data space can play in enabling it. This is a more confident, political and public-facing role for the data space: as rights broker, trust infrastructure, literacy engine, technical partner and collective voice for cultural heritage. In the months ahead, the data space will support the cultural heritage sector in the following areas of action:

### **Coalition building and policy alignment**

As sectoral strategies develop – particularly the upcoming AI Strategy for the Cultural and Creative Sectors to be announced by the European Commission in 2027, as outlined in the Apply AI Strategy and the Culture Compass – and as the EU defines its next long-term budget with significant AI investment, this paper offers the cultural heritage sector a clear, shared basis for joint advocacy. It will support coalition building and policy alignment, not only within our sector but across the broader public knowledge and AI ecosystems.

## Knowledge sharing and capacity building

The data space and the Europeana Initiative will mobilise its wide network – including the Europeana Network Association communities and the Europeana Aggregators' Forum – to develop thought leadership and strengthen AI literacy across the sector. This will include developing protocols and frameworks – for example for sharing cultural heritage data for AI use within a reciprocal logic – and guidelines, training and practical tools to contribute to a coherent European approach. It will also focus on areas for further investigation to mature the ideas put forward in this paper: from the environmental impacts of AI to exploring differentiated access models.

## Advancing collective ownership of the Public AI vision

This paper is a starting point. Its messages, and how to operationalise them through the data space, will be further developed with input from the data space community, the Europeana Initiative and relevant partners, reflecting the collaborative spirit of the Alignment Assembly. The data space will continue to build collective ownership of the Public AI vision in the heritage community, and we welcome ongoing reactions, reflections and proposals.

The task ahead is clear: align around a shared position, use the data space to build practical capacity, and shape a Public AI ecosystem where cultural heritage professionals continue to deliver open access to knowledge while safeguarding the public interest.

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# The case for Public AI: *making it happen with cultural heritage*

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