

Freedom of Information Act Request

Under the Freedom of Information Act, I would like to request the following information:

AI system information

1. How many artificial intelligence (AI) systems does your trust/health board currently have in development?
2. How many AI systems are currently deployed within your trust/health board?
3. For every AI model currently being used or developed in your trust:
 - 3a. Is the AI model being used operationally, clinically, or for another purpose?
 - 3b. What department(s) is the AI system being used in?
 - 3c. What month and year was the AI system first deployed? (n/a if in development).
 - 3d. Was the AI system created by a commercial entity, university, in-house, or within another NHS trust? Please give the name of the organisation.
 - 3e. What is the AI systems architecture? (e.g. deep neural network, random forest, logistic regression, large language model).
 - 3f. Which coding language and packages are used to deploy the AI system? (e.g. python - scikit-learn, pytorch, tensorflow)
 - 3g. What is the nature of the input of the AI system? (e.g. a medical scan, free text notes, tables of lab results).
 - 3h. What is the nature of the output of the AI system? (e.g. a masked image, a risk score, natural text).
 - 3i. How was the AI system validated in the target population before deployment?
 - 3j. What measures are in place to monitor for degradation in the performance of the AI system post-deployment?
 - 3k. What was the cost to procure the AI model and what is the ongoing cost of use?
 - 3l. Which departmental budget is the cost paid from?

Data management

4. Was any local patient data used for training or fine tuning the AI system?
5. Is any patient data collected specifically for the purpose of training any of the AI systems currently in development or deployment?
6. Do you share, or plan to share, any patient data with third-party developers for AI-related purposes? If yes, please provide details of the data-sharing agreement or relevant policy.

Regulation

7. What is the regulation and certification of the AI model under the European Union

Medical Device Directive and/or United Kingdom Medicines and Healthcare products
Regulatory Agency (MHRA)?

Patient/public involvement

8. Was any patient/public engagement undertaken before deployment of the AI system?
9. Is there any ongoing patient/public engagement input into the use of AI within your organisation?

Governance

10. Who has responsibility for the AI systems being using?
11. Does your organisation have a governance policy that covers:
 - 11a. Use of AI systems within your organisation?
 - 11b. Ongoing evaluation of an AI model's performance after deployment?
 - 11c. How to monitor for bias in the AI system and how to mitigate against this?

Thank you for your request for information regarding the use, development, and governance of artificial intelligence (AI) systems within the Trust.

Following a thorough review, we can confirm that the Trust is unable to comply with this request in full.

The information you have requested is not held centrally and would require extensive data gathering from multiple departments, clinical systems, digital teams, and procurement records, as well as manual review of individual contracts and clinical governance records.

In particular:

- The detailed information requested under Questions 3a to 3l would require individual follow-ups with multiple teams and system owners, many of whom may not classify or record their systems as "AI" in a searchable format.
- Data sharing, regulatory status, and patient engagement information would need to be manually collated from governance, legal, procurement, research, and clinical teams across the Trust.
- The Trust does not hold a single repository where the requested information is recorded in the structured detail required.

Exemption Applied: Section 12(1) – Exceeds the Appropriate Cost Limit

Under Section 12(1) of the Freedom of Information Act 2000, the Trust is not obliged to comply with a request if the cost of doing so would exceed the statutory limit of £450, which is equivalent to 18 hours of staff time.

The time required to:

- Identify relevant AI systems
- Contact each service lead or digital owner
- Extract detailed technical, procurement, clinical, regulatory, and governance information across multiple systems

would far exceed this cost threshold.

Advice and Assistance – Section 16

If you would like to refine your request (for example, by focusing on AI systems in a specific clinical area, or by requesting a list of AI systems only, without detailed operational, technical, or governance breakdowns), we may be able to process a reduced request within the appropriate cost limit.

Please do not hesitate to contact us if you wish to explore refining your request or if you would like to discuss this further.

If you are not satisfied with the handling of your request, you have the right to request an internal review. Requests for an internal review should be submitted within 40 working days from the date of this response, and should be addressed to d.wraith@nhs.net.

If you remain dissatisfied after the internal review, you have the right to appeal to the Information Commissioner's Office (ICO). The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Website: <https://ico.org.uk/make-a-complaint/>

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