

Reference:	FOI.16481.25
Subject:	Artificial intelligence (AI)
Date of Request:	29 January 2025

Your request and our response

Hywel Dda University Health Board (UHB) is unable to provide you with all of the information requested, as it is estimated that the cost of answering your request would exceed the “appropriate limit” as stated in the Freedom of Information Act 2000 and the Data Protection (Appropriate Limit and Fees) Regulations 2004. The “appropriate limit” represents the estimated cost of one person spending 18 hours (or 2½ working days) in determining whether the UHB holds the information, and locating, retrieving and extracting the information.

In order to provide you with the information requested for questions 13, 15 and 19, the UHB would need to undertake a manual trawl to establish the proportion of data stored within its infrastructure, establish and gather information on carbon footprint, and gather information on its digital operations proportion split, to identify any information that would fulfil these parts of your request. This is due to the fact that the information requested is not recorded centrally.

The UHB is therefore applying an exemption under Section 12 of the Freedom of Information Act 2000 (FoIA), which provides an exemption from a public authority’s obligation to comply with a request for information where the cost of compliance is estimated to exceed the appropriate limit.

However, under Section 16 of the FoIA, we are required as a public authority, to provide advice and assistance so far as it is reasonable, to individuals who have made a request under the FoIA. Therefore, the UHB provides the accessible information it holds below.

AI Strategy and Planning

1. To what extent does your department have a clearly defined and documented AI strategy?
Please select one of the following options that applies.
 - a. No AI strategy in place.
 - b. Initial discussions or ideas about AI, but no definitive plan.**
 - c. A basic AI strategy is in development or has been drafted.
 - d. A well-defined AI strategy is in place, but implementation is in the early stages.
 - e. The AI strategy is being actively implemented with measurable progress.
 - f. A fully defined and implemented AI strategy is driving significant impact.

2. To what extent does your AI strategy or goals align with the AI opportunities action plan?
Please select one of the following options that applies.
 - a. Unaware of the AI opportunities action plan or no attempt to align with it.
 - b. General awareness of the AI opportunities action plan, but no specific efforts to align.
 - c. Some aspects of the AI strategy or goals are aligned with the AI opportunities action plan.
 - d. Conscious effort made to align the AI strategy with the key principles and directions of the AI opportunities action plan.
 - e. Strong alignment between the AI strategy or goals and the AI opportunities action plan, with clear connections and shared objectives.
 - f. AI strategy or goals are fully integrated with the AI opportunities action plan, contributing directly to its successful implementation.

The UHB confirms that there is no documented AI Strategy in place.

3. What is the likelihood that your department's AI strategy will be fully implemented within the next two years? Please select one of the following options that applies.
- Significant obstacles and uncertainties make full implementation unlikely in the next two years.
 - Implementation is in progress but faces challenges that may delay completion.
 - Moderate confidence in achieving full implementation within the timeframe.
 - High likelihood of full implementation, with most key elements in place.
 - Almost certain to achieve full implementation within the next two years.

This is not a valid Freedom of Information request. The FoIA covers any recorded information that is held by a public authority; recorded information includes printed documents, computer files, letters, emails, photographs, and sound or video recordings. The FoIA does not cover information on estimates, opinions or recommendations. The UHB has an obligation to provide information already in recorded form but cannot create new information to answer a question.

4. How confident is your department that current AI governance structures are adequate for managing AI risks? Please select one of the following options that applies.
- No AI governance structures in place or serious concerns about their adequacy.
 - Limited AI governance in place, with significant gaps and areas for improvement.
 - Moderate confidence in current AI governance, but some areas of uncertainty remain.
 - Generally confident in the adequacy of AI governance structures to manage most risks.
 - Strong confidence in AI governance, with robust processes and oversight in place.
 - Extremely confident that AI governance structures can effectively manage all foreseeable AI risks.

Please see the response to question 3.

5. What percentage of your department's total budget is allocated to AI-related projects this fiscal year? How much is this?

The UHB confirms that 0% of its Digital Department's budget is allocated to AI related projects for this fiscal year.

6. How does your department or agency assess the economic impact or cost-effectiveness of AI technologies? Please select one of the following options that applies and provide any relevant data or reports on AI's economic benefits.
- No formal assessment:** No systematic approach to evaluating the economic impact of AI.
 - Qualitative assessment:** Relies on anecdotal evidence, case studies, or expert opinions to assess the impact of AI.
 - Quantitative assessment:** Uses metrics, data analysis, and modelling to measure the economic benefits and costs of AI.
 - Comprehensive evaluation:** Includes both qualitative and quantitative assessments, considering a wide range of economic factors and potential impacts.

The UHB confirms that there is no documented AI Strategy in place.

AI Deployment and Use Cases

7. What is your department's current stage of AI deployment? Please select one of the following options that applies.
- No AI use cases.
 - Exploring opportunities
 - Planning for at least one AI use case.
 - Piloting at least one AI use case.**
 - At least one AI use case is fully deployed.
 - Multiple AI use cases fully deployed.
8. For your most significant AI use case, how confident are you that the expected benefits will be realised? Please select one of the following options that applies.
- No clear expectations of benefits or serious doubts about achieving them.
 - Some anticipated benefits, but significant uncertainty about their realisation.
 - Moderate confidence in achieving some of the expected benefits.
 - Confident that most of the expected benefits will be realised.
 - Strong confidence that the AI use case will deliver significant benefits.
 - Extremely confident that the AI use case will fully achieve or exceed its intended benefits.

Please see the response to question 3.

Risk Management and Ethics

9. How thoroughly has your department assessed the risks associated with AI deployment? Please select one of the following options that applies.
- No formal risk assessment conducted for AI deployment.
 - Initial discussions about AI risks, but no systematic assessment.
 - Some areas of AI risk have been assessed, but gaps remain.
 - A moderate risk assessment has been conducted, covering key areas.
 - A comprehensive risk assessment is in place, addressing a wide range of potential risks.
 - A thorough and ongoing risk assessment process is embedded in AI development and deployment.
- Please see the response to question 3.
10. How confident are you that your department is compliant with relevant data protection laws when using AI? Please select one of the following options that applies.
- Significant concerns about compliance with data protection laws.
 - Limited understanding of data protection requirements for AI.
 - Some measures in place to ensure compliance, but gaps may exist.
 - Reasonably confident in compliance with data protection laws.
 - Strong confidence in data protection compliance, with robust processes in place.
 - Fully confident in compliance with all relevant data protection laws and regulations.

Please see the response to question 3.

11. How well does your department ensure transparency in the use of AI in public services? Please select one of the following options that applies.

- a. No efforts to ensure transparency in AI use.
- b. Limited information provided to the public about AI systems.
- c. Some transparency measures in place, but room for improvement.
- d. Reasonable transparency in AI use, with public information available.
- e. Strong commitment to transparency, with clear communication about AI systems.
- f. Full transparency in AI practices, including open data and explainable AI.

Please see the response to question 3.

Data Residency and Sovereign Infrastructure

12. How does your department or public body ensure that its data storage complies with UK sovereignty and data residency requirements? Please outline any policies or regulations guiding data storage within UK borders.

As some of this information is already within the public domain and accessible by another means, the UHB has applied an exemption under Section 21 of the FoIA. The UHB adheres to the Information Governance Framework Policy and the Third Party Supplier Security Policy. For ease of reference, please click on the links provided, which will take you directly to the policies:

[238 - Information Governance Framework Policy](#)

[279 - Third Party Supplier Security Policy](#)

13. Can you provide the proportion of data stored within UK-based infrastructure versus foreign cloud services (e.g., US-based providers) within your department/agency?

The UHB has applied a Section 12 exemption.

14. What measures are in place to ensure that your data storage solutions meet national security standards? Please provide details of relevant frameworks or protocols currently implemented.

Please see the response to question 12.

Energy Consumption and Efficiency of AI

15. What is the estimated carbon footprint of your department or agency's AI operations (e.g., training, deployment) over the past year? Please include energy consumption figures if available.

The UHB has applied a Section 12 exemption.

16. How do you track the energy usage of AI workloads, and are there any reporting mechanisms in place for sustainability goals? Please provide relevant metrics or guidelines.

The UHB confirms that it has no specific reporting mechanism for AI sustainability goals. There is a Sustainable Resources Committee that manages and tracks other sustainability targets; a link to the UHB's committee meeting webpage has been provided below.

[Sustainable Resources Committee \(SRC\) - Hywel Dda University Health Board](#)

Data and Infrastructure

17. How would you rate the quality of data used for your AI systems? Please select one of the following options that applies.

- a. Data quality is poor and unreliable.
- b. Data quality is a concern, with significant issues.
- c. Data quality is adequate but could be improved.
- d. Good data quality with regular validation processes.
- e. High data quality with robust quality assurance measures.
- f. Excellent data quality with continuous validation and improvement.

Please see the response to question 3.

18. What is the level of confidence in your department's digital infrastructure's ability to support current and future AI initiatives? Please select one of the following options that applies.

- a. Serious concerns about the infrastructure's ability to support AI.
- b. Infrastructure limitations may hinder AI initiatives.
- c. Moderate confidence in the infrastructure's capacity for AI.
- d. Confident that the infrastructure can adequately support current and near-term AI needs.
- e. Strong confidence in the infrastructure's ability to support ambitious AI projects.
- f. Extremely confident that the infrastructure is future-proof and ready for any AI challenge.

Please see the response to question 3.

19. Does your department or agency currently use a hybrid infrastructure (i.e., a mix of on-premises and cloud services) for its digital operations, including AI applications? Please specify the proportion of services hosted on each type of infrastructure.

The UHB can confirm that it currently uses a mix of on-premises and cloud services for its digital operations. However, a Section 12 exemption has been applied to the proportion split.

20. What factors influence your department's decision-making process when choosing between public cloud, private cloud, or on-premises infrastructure for AI-related projects or services?

Please see the response to question 3.

21. What plans or initiatives are in place to ensure your department's digital infrastructure is scalable enough to meet future demands for AI-powered services or technologies over the next 5–10 years?

The UHB confirms that there are no current plans or initiatives in place to meet future demands of AI services.

22. How does your department or agency ensure the quality of data used in AI-driven projects or services? Please provide any metrics, guidelines, or standards employed for data validation.

The UHB confirms that there is no documented process to ensure quality of data used in AI-driven projects or services.

Skills and Training

23. How effectively is your department upskilling employees to use AI? Please select one of the following options that applies.

- a. No upskilling initiatives in place for AI.
- b. Limited training available, with little focus on AI skills development.**
- c. Some training programs offered, but not comprehensive.
- d. Effective upskilling programs are in place, providing employees with essential AI skills.
- e. A strong focus on AI skills development, with comprehensive training and support.
- f. A culture of continuous learning and development, ensuring employees are equipped for the AI-powered future.

24. Will you be relying on in-house skills for AI strategy development and implementation or seeking third-party services/consultancy?

The UHB confirms that it has not considered in-house skills for AI strategy development or implementation.

Future Ambitions

25. How confident are you that your department will reach its AI ambitions? Please select one of the following options that applies.

- a. Significant doubts about achieving AI ambitions.
- b. Low confidence in reaching AI goals.
- c. Moderate confidence in achieving some AI ambitions.
- d. Confident in achieving most AI goals.
- e. Strong confidence in reaching AI ambitions, with clear plans in place.
- f. Extremely confident in achieving and exceeding AI ambitions.

Please see the response to question 3.