








Collated Artificial Intelligence Governance Policy Feedback

Name of Place / Provider	Comments by Place / Provider	Supporting Documentation
<p>NHS Humber & North Yorkshire Integrated Care Board</p> <p>Feedback submitted by Martyn Slingsby Digital Programmes Lead The Digital Portfolio Office martyn.slingsby@nhs.net</p>	<p>Minor changes made to Artificial Intelligence Definition – page 4</p> <p>Inclusion of uses of AI in Healthcare – page 9.</p>	 <p>HNY AI Governance Policy - DRAFT V1.0 2</p>
<p>NHS Humber & North Yorkshire Integrated Care Board</p> <p>Feedback submitted by Nicky Lowe Head of Corporate Affairs and System Support</p> <p>ICB Corporate Affairs Portfolio – Head of Hull Place and East Riding Place Sub System Tel: 07936939168 Email: nicky.lowe@nhs.net</p>	<p>Comments within the embedded documents and feedback provided in meetings.</p> <p>Further amendment made to AI definition following update from comments received by MS.</p> <p>HR section added under Roles & Responsibilities – page 6.</p> <p>Graphic on use of AI added. – page 7.</p> <p>Point added about engaging Union Representatives if implementation of AI involves service change. – page 10.</p> <p>Title change from ‘Artificial Intelligence Policy’ to ‘Artificial Intelligence Governance Policy’ to clarify that this is about expectations of staff when</p>	 <p>AI Governance Policy - DRAFT V1.0 09.10.2:</p>  <p>AI Governance Policy - DRAFT V1.0 20.09.2:</p>

	looking to use or procure AI products, it is not a policy on how the ICB will use AI.	
<p>Paul Ellis Strategic Lead Business Practice and Performance (Data Protection Officer), North East Lincolnshire Council</p> <p>DPO for NEL Place (01472) 32 3372 Paul.Ellis@nelincs.gov.uk</p>	<p>Changes made to final policy based on comments.</p> <p>Section added to Roles & Responsibilities in relation to the Caldicott Guardian. Questions have been clarified with PE. See attachment for further information.</p>	 AI Policy - DRAFT V1.0 21.08.23.docx
<p>Alex Bell Deputy Director of Data, Business Intelligence & Analytics alex.bell1@nhs.net</p>	<p>Update made based on feedback – page 9. Question clarified with AB – page 9.</p>	 AI Policy - DRAFT V1.0 21.08.23 (002).d
<p>Claire Stocks Corporate Affairs Manager NHS Humber and North Yorkshire Integrated Care Board (ICB) Telephone:- 07802 718 473 Email: claire.stocks@nhs.net</p>	<p>Comments within the policy have been addressed. See attached for further information.</p>	 AI Policy - DRAFT V1.0 21.08.23 (CS con
<p>Karina Ellis Executive Director Corporate Affairs NHS Humber and North Yorkshire Integrated Care Board Tel: 07803 411548 Email: karina.ellis@nhs.net</p>	<p>Positive feedback received. Agreed with PE's feedback regarding addition of Caldicott Guardian to Roles & Responsibilities</p>	Feedback via email 07.09.23
<p>John Mitchell</p>	<p>Positive feedback/ support for policy received.</p>	Feedback via email 05.09.23

<p>Head of/Associate Director IT NHS Humber & North Yorkshire Integrated Care Board John.mitchell1@nhs.net</p>		
<p>Jack Lewis Consultant in Public Health NHS Humber and North Yorkshire Integrated Care Board (ICB) Humber and North Yorkshire Health and Care Partnership Tel: 07858 687653 Email: jack.lewis1@nhs.net</p>	<p>Positive feedback/ support for policy received.</p>	<p>Feedback received via email 05.09.23</p>
<p>Dave Mills Head of Digital NHS Humber & North Yorkshire ICB 07816209886 Dave.mills12@nhs.net</p>	<p>Updated to include engagement with Business intelligence colleagues when implementing AI. – pages 6 & 9.</p>	<p> AI Policy - DRAFT V1.0 21.08.23.docx</p>
<p>Humber & North Yorkshire ICB – Information Governance Group 7 August 2023 – 15:30 – 17:00 MS Teams</p>	<p>The draft policy was shared and highlighted were the areas within the policy that require further discussion or agreement. HG queried whether a Clinical Safety Officer has been appointed and upon discussions it was clear there was no such appointment in the ICB, NL suggested approaching other providers that have one to determine whether we could tap into this, should it be required. NW added that there are some clinical settings that are starting to use AI, particularly in</p>	<p>Minutes from group available.</p>

	<p>Primary Care Triage and therefore there would be opportunity to tap into the role across the network.</p> <p>A Medical Device Safety Officer could also be outsourced, should it be required. HG highlighted the wording within the policy that outlines the ICB does not support the use of open source or publicly available AI software such as Chat GPT without written consent from NHS England. Discussions were had and there was a sense that this was a little excessive. HG added that she had included a section in the DPIA template for completion when AI is being used.</p> <p>MN noted that AI products would have some advantages and should therefore be used in the correct way being mindful of information shared.</p>	
<p>Becky Bibby Programme Director- Innovation, Research and Improvement System (IRIS)</p> <p>NHS Humber and North Yorkshire Integrated Care Board (ICB) Humber and North Yorkshire Health and Care Partnership</p> <p>Tel: 07850853151 Email: becky.bibby@nhs.net</p>	<p>Reviewed roles and responsibilities on page 6 and these do not sit with the R&D Support Services team. The R&D Support Services team promote and facilitate primary care research, they do not undertake ethical evaluations or assessments, this is the work the Health Research Authority (HRA). This R&D Support Services team would assist researchers by signposting them to the correct HRA guidance and advising them on how to apply for ethics approval.</p> <ul style="list-style-type: none"> Facilitate the evaluation of the ethical implications of using AI systems in healthcare and research- <i>this responsibility lies with the HRA and their Research Ethics Service. Any AI research programme within the NHS requires a review by an NHS Research Ethics Committee (REC) as well as an assessment of regulatory compliance and related matters undertaken by dedicated HRA staff.</i> Review and provide ethical guidance on AI projects and applications- <i>this expertise does not sit within the team, the Health Research Authority (HRA) and the AI and Digital Regulations Service will provide guidance for NHS and social care adopters, and digital health innovators and the R&D Support Services would signpost to these.</i> 	<p>Feedback received via email 04.08.23</p>

	<ul style="list-style-type: none"> Facilitate the assessment of the potential biases, fairness, transparency, and accountability of AI systems- <i>this responsibility doesn't lie with the R&D Support Service team</i> Ensure that AI research aligns with ethical standards and safeguards patient rights and well-being - <i>this responsibility doesn't lie with the R&D Support Service team</i> <p>The content on page 8, the final line can be amended to: <i>If you are planning to develop an AI research programme within the NHS, the R&D Support Services team within the Innovation, Research and Improvement System (IRIS) will be able to provide advice and guidance on how to apply for ethics approval via the HRA.</i></p> <p>Roles and responsibilities section amended to reflect feedback.</p>	
<p>Tracey Wartnaby Research and Development Senior Officer NHS Humber and North Yorkshire Integrated Care Board (ICB) Email: tracey.wartnaby@nhs.net</p>	<p>With regard to the final line on Page 8. I would just ensure there is distinction between NHS ethics (REC) and approvals via the HRA as two separate processes. I've also made reference to the 'HRA AI and Digital Regulations Service' on the first line. I also think that whole paragraph needs to be broken into separate points, such as: Health Research Authority (HRA) Approval is required for research studies that take place in the NHS in England. The 'HRA AI and Digital Regulations Service' can provide guidance for NHS AI adopters, and digital health innovators. Review by an NHS Research Ethics Committee (REC) is required, as well as an assessment of regulatory compliance and related matters undertaken by dedicated HRA Staff.</p>	<p>Feedback received via email 04.08.23</p>

	<p>If you are planning to develop an AI research programme within the NHS, the R&D Support Services team within the Innovation, Research and Improvement System (IRIS) will be able to provide advice and guidance on how to apply for research ethics and approvals via the HRA.</p>	
<p>Nicki Sparling Assistant Director of Quality & Improvement / Deputy Lead Nurse (RMN) Deputy Caldicott Guardian</p> <p>East Riding of Yorkshire Health and Care Partnership</p> <p>NHS Humber and North Yorkshire Integrated Care Board (ICB) Humber and North Yorkshire Health and Care Partnership</p> <p>Mobile: 07377974241 Email: Nicki.sparling@nhs.net</p>	<p>Positive feedback/ support for policy received.</p>	<p>Feedback received via email 04.08.23</p>