DRAFT_AI in NHS Wales Libraries Policy, Digital Health and Care Wales (DHCW)

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1. DOCUMENT HISTORY

Person/Committee/Group who have received or considered this paper		
COMMITTEE OR GROUP	DATE (most recent)	OUTCOME
e-Library Stakeholders	17/02/2025	Policy reviewed and accepted
AI Governance Sub-Group (to the AI Commission for Wales)	22/04/2025	Feedback received and actioned
AI Commission for Wales Representatives	22/04/2025	Feedback received and actioned
DHCW AI Steering Group	26/06/2025	Approval given

2. POLICY STATEMENT

The adoption of Artificial Intelligence (AI) and Machine Learning (ML) technologies in both private and public sector is growing rapidly. As library, information and research services and their users navigate this transforming landscape, it has been deemed essential to outline key considerations for the use of AI in this space

AI tools already come in numerous forms, see [Appendix A](#), the most commonly encountered in the libraries sector is Generative AI:

- Generative AI – GenAI is capable of producing content, such as text, imagery, audio and video, based on the input provided. In a libraries example, GenAI tools such as Chat GPT are being used to quickly summarise a range of information. A user could instruct GenAI to look at 10 journal articles and produce a summary of the key content covered by those 10 articles.

3. SCOPE OF POLICY

The scope of this policy covers the following users of the NHS Wales e-Library service who are licenced under the [NHS Wales Copyright Licence Plus](#):

- NHS Wales employed and contracted staff

- Students when they are on placement

- Hospice workers employed by all hospices in Wales that provide NHS Wales commissioned care

- Private, independent and third sector employed social workers and private, independent and third sector employed social care managers

- Members of the public who sit on a Designated Committee of an NHS Wales organisation when acting on behalf of the committee

To support their use of AI and Machine Learning technologies when searching for and using information, and other health and care library and information activities.

Please note that NHS Wales local and/or national governance procedures and policies should be adhered to alongside this policy, for example, please see section 5.1.6.

4. AIMS & OBJECTIVES

This policy aims to guide NHS Wales library and information services and the above-mentioned end users with the responsible use of AI in this space, while safeguarding our users, and enhancing healthcare knowledge management. It will also help to inform our cross-sector colleagues and stakeholders of NHS Wales' position regarding library, information and research specific AI and Machine Learning technologies.

A diverse range of AI tools are already being used across the library, information and research sector in various ways, such as:

- Search enhancement
- Information summary
- Content generation
- Data extraction
- Evidence screening

Some of this work, particularly that of information summary and content generation, can infringe upon the copyright legislation if not carefully considered. For example, entering published articles into a free to use tool available on the internet to create a summary of information, breaches Copyright Law.

The aim of this policy is to provide guidance to those within scope, that all might interact with AI safely, and within the boundaries of copyright laws. This does not supersede national guidance, such as that which is published by Welsh Government (Using artificial intelligence in the public sector | Centre for Digital Public Services) or that published by Digital Health and Care Wales (Artificial intelligence (AI) - Digital Health and Care Wales), but is to provide specificity to librarians and researchers within the outlined scope, with regards to the most likely scenarios for AI interaction within this field.

5. ROLES & RESPONSIBILITIES

5.1 All NHS Wales Library and Information Services

NHS Wales Library and Knowledge Service and NHS Wales e-Library responsible for the procurement, implementation and/or management of library, information and research resources for NHS Wales.

5.1.1 UNDERSTAND USERS AND CONTEXT

If library, knowledge and information professionals wish to utilise an AI tool, they should consider their users' needs, to ensure the tool meets a specific purpose. Also consider the sensitive information that is available to them professionally, and ensure that no personal data, commercially sensitive data, or data specifically licensed for use by the individual or the organisation specifically is entered into an AI tool.

5.1.1.1   AI depends on the data it is given, whether by the user, or the data it has been trained on. The data training an AI tool should be large and diverse to eliminate bias in query results. The lesser the quality of data input, the lower the quality of the output.

5.1.1.2   Acknowledge the tendency towards bias results from AI, and ensure that adequate review of any AI outputs are undertaken by a human being.

5.1.1.3   AI is not a sufficient replacement for a human in the completion of a task. While useful as a supplementary tool, AI outputs must be reviewed, and clearly indicated and referenced as to where, and why, if they are to be used.

Acknowledge that any service users whose data is in question may not want AI to interact with their data in any way. Ensure that if a service user's data might be processed by an AI tool, that the service user(s) in question has consented to this action. This for example, may occur in the form of user testing with a resource, or with an AI Tool that uses the ongoing interactions with users to train from.

5.1.1.4   Service users within this category should agree to their data use, with specificity as to how their data is being used, for example, training an AI model.

5.1.1.5   User data should categorically only be used with approved AI tools, and never freely available tools on the internet.

5.1.2 AI LITERACY

Pursue a general knowledge and basic understanding of AI and Machine Learning technologies among staff to manage risks, to better assist library users and combat any anxiety around the technology. [The e-Library has published an introductory paper on the subject to this end](#) designed to be easy to understand, with links out to UK Government guidance for further detail, which is regularly reviewed and kept up to date.

5.1.3 AI ADOPTION

Before adopting AI technology to support searching for and using information, consider and clearly define the desired outcomes and how AI will contribute to achieving them. For example, to save staff time, or to support users with additional needs.

5.1.3.1   AI should not be used for decision-making. AI tools can be very useful for support and efficiency improvements, but final decisions must always be taken by a human.

5.1.3.2   Review available evidence to support the knowledge that the AI tool has the capacity to fulfil the desired objective.

5.1.3.3   Collect and audit data of any AI tools in use, reviewing at least annually to ensure that the objectives of the AI are being met, and that the benefits persist over time, ensuring value for money, and that the tool continues to meet the need of the service.

5.1.3.4   Ensure AI tools are safe and ethical:

5.1.3.4.1   To mitigate the tendencies towards bias when using AI tools, ensure datasets are regularly audited to maintain a good quality and diversity of data. Speak to the provisioner of the AI tool and request this assurance.

5.1.3.4.2   Privacy concerns can be addressed with additional data protection methods at the outset, such as data encryption or anonymisation. Speak to the AI provisioner about the capacity for this, and consult with your organisation Information Governance team for a detailed review of the tool, ensuring only AI tools approved for use by the organisation are used.

5.1.3.4.3   Consult with your organisation Cyber Security team before implementing any new software, to ensure thorough reviews are taken to protect NHS Wales network and data integrity,

5.1.3.4.4   Consult the provisioner of an AI tool on the environmental impact. Ensure steps are being taken to minimise environmental impact and consult with relevant senior staff within your organisation to discuss if the mitigation attempts are sufficient.

5.1.4 TRANSPARENCY, ACCOUNTABILITY AND GOVERNANCE

Be transparent about where and how AI tools are being used, what data they are being used with, and if or when AI drives any decision making. The respective library and information Privacy Policy should be updated to reflect any use of AI that arises.

5.1.4.1   Ensure those whom the AI will impact can understand what the AI tool is doing and why.

5.1.4.2   Ensure external suppliers also meet this same level of transparency, disclosing specific foundation AI models and the decision-making process behind the AI in an understandable way.

5.1.4.3   Where Generative AI is used to support searching for and using information, that content is required to be fully referenced and attributed to the AI tool. See the e-Library Guide to AI for more information on how to reference AI tools.

5.1.4.4   The Governance of AI in wider NHS Wales has been addressed Public Health Wales in a briefing for digital directors

5.1.4.4.1   The AI Commission for Health and Social Care in Wales have endorsed the adoption of AI Digital Regulation Service and Algorithmic Transparency Recording Standard (ATRS)

5.1.4.4.2   Any AI adopted is:

5.1.4.4.2.1   *Compliant with Welsh Digital Standards*

5.1.4.4.2.2   *Approved by Health Technology Wales*

5.1.4.4.2.3   *Compliant with ISO Standards*

5.1.4.4.2.4   *Compliant with Medical Device Standards*

5.1.4.4.2.5   *Approved through an ethical framework assessment, using the ethical guidance from the Alan Turing Institute*

5.1.4.4.2.6   *Procured using good practice in the procurement of AI products*

5.1.4.4.3   Follow Welsh Government guidance on using Generative AI

5.1.4.4.4   Ensure compliance with the [NHS Wales Copyright License Agreement](#)

5.1.5 THIRD-PARTY ENGAGEMENT

When seeking to procure, adopt or make available, including as part of an ongoing contract, any third-party software, either nationally by the NHS Wales e-Library or locally by library and information services, ensure that any AI use within the product or service, AI tool or otherwise, is clearly defined at the outset, and that compliance needs of the organisation are met.

5.1.6 AI TOOL SECURITY

When seeking to utilise an AI tool, follow the assurance processes for new software as per your organisation process for any product implementation, for example, consult with network security, information governance, and any infrastructure that the tool might impact.

5.1.6.1   Consider carefully what data the tool has access to, how it is being used, and why. An integrated third-party AI tool might have access to organisational data or personal information that should not be retained or used to train the AI model.

5.1.6.2   If the tool is hosted outside of the organisations secure network, ensure the integrity of that offsite network to ensure data safety is maintained at every point. Always engage with the relevant IT Security team for your organisation.

5.1.6.3   Complete as necessary, Privacy Impact Assessment, Cyber Security Risk Assessment, and any other relevant paperwork for the implementation of new products in your organisation.

5.1.6.4   Consult with the NHS Wales AI Governance group.

5.1.7 AI GUIDANCE

All interaction with AI tools should follow the Welsh Government, and UK Government regulations and guidance.

[Artificial intelligence (AI) | GOV.WALES](#)

[AI Playbook for the UK Government - GOV.UK](#)

5.1.8 CONTINUOUS EVALUATION

Regularly evaluate procured and/or implemented AI systems to maintain quality, safety and effectiveness. For example:

- Schedule regular (annual) contract review meetings for systems procured where suppliers would ensure any recent or impending updates are communicated.
- Stay up to date with any new guidance and policies around the topic of Artificial Intelligence
- Carry out more regular (at least once every two years) Privacy Impact Assessments for any AI tools linked to from the service and Security Assessments in line with organisational policies to ensure AI tools continue to work within the boundaries laid out by the organisation.
- Monitor usage to ensure value for money is being achieved

- Collect user feedback to review the effectiveness of the software, ensuring it is still meeting a demand.
- Ensure the tool is and remains clinically effective

All elements of this policy should be considered at the point of evaluation as well as implementation, including tool accuracy, consistency, output quality (without bias), potential risk and harm, and continued reasoning for the ongoing use of the AI tool in question.

5.1.9 CONTINUOUS DEVELOPMENT

Acknowledge that AI is an evolving field, and that there is a need for ongoing learning, adaptation and incorporation of new AI technologies and best practices.

5.2 NHS Wales copyright licence plus licenced users

5.2.1 ANY PERSON COVERED BY THE NHS WALES CLA LICENSE (SEE AUTHORISED USER LIST)DATA USE

When entering information or uploading content into AI tools, consider current Copyright Law and any future UK or Welsh Government legislation relating to data use and access. Copyright licensing does not extend to the re-use of material by entering, for example, published articles into an AI tool that may retain, learn from, or otherwise benefit from that information. For a more specific example, if an article is uploaded to a Generative AI tool for summarising the content but the person uploading the content doesn't have the authorisation from the original author to do so, that person is in breach of copyright law.

Consider also the terms and conditions of any platform, database or other product you might have acquired data using. Some suppliers are explicit that users do not have permission to re-use platform/product outputs with external AI tools (such as to create a summary).

Never enter confidential, or personally identifiable information into an AI tool and always seek permission from the original author/creator to upload or use any content that is not yours. For example, a published article, book chapter, and any content protected by the Intellectual Property Act.

5.2.2 AI LIMITATIONS

While Artificial Intelligence (AI) has made significant strides, it remains fundamentally different from human cognition. AI tools lack the nuanced understanding and context that humans bring to information processing. For example, AI algorithms identify patterns based on statistical correlations, often relying on keywords and links. Summary tools, while efficient, cannot replace the intuition, critical thinking and empathy of a skilled human searcher. Any AI generated outputs should be quality checked by a human reviewer. We have further advice on effective literature searching on the e-Library website.

5.2.3 RESPONSIBLE USE

In addition to complying with this and any other policies and guidance issued by your organisation, Welsh Government and UK Government with regards to AI, be sure to consult your organisation ahead of using AI Tools to ensure the tool is considered safe to use. Consult your manager, or your local IT team for more information about particular AI tools.

Consider carefully what data and information the AI tools are being given access to. As a rule of thumb, ask yourself, "would I publish this data freely on the internet."

5.2.4 REFERENCE WHEN AI TOOLS ARE USED

Where Generative AI is used to create content, that content is required to be fully referenced and attributed to the AI tool. See the NHS Wales e-Library Guide to AI for more information on how to reference AI tools. If outputs from AI tools are used in contribution to a piece, these must be referenced as with any other media.

5.2.5 END USER RESPONSIBILITY

Users should keep up to date with any new guidance from your local or national library service relating to AI tools used for library, information and research purposes.

Users should consider that the tools being used are the most appropriate for the task. For example, using evidence-based resources first to answer any health and care related query to ensure the quality of information returned, as opposed to starting all queries with generalised AI tools.

Report any inconsistencies or unexpected behaviours or experiences from AI tools to your relevant organisation (for library provided resources, contact your local or national library service.)

Stay abreast of the library, knowledge and information AI tools procured via your local and national library service to support clinical practice.

6. REFERENCES

INDEX NUMBER	DOCUMENT NAME
AW-POL-4	All Wales Information Governance Policy
CS-POL-7	Information Security Policy

7. IMPLEMENTATION / POLICY COMPLIANCE

NHS Wales staff, secondees, volunteers, contracted third parties, students on placement, hospice workers in Wales, private, independent and third sector employed social workers and social care managers and members of the public who sit on a Designated Committee of an NHS Wales organisation when acting on behalf of the committee are required to comply with this policy.

This policy will be reviewed every two (2) years or amended when a required change is identified through the changing AI landscape. All amendments will be reviewed by the e-Library Service Board and approved by DHCW Management Board.

User compliance will be monitored by monitoring usage data across e-Library resources for unusual activity. Where there is a requirement involving a third-party supplier, the relevant contract manager will be responsible for conducting reviews at least annually through contract review meetings.

8. EQUALITY IMPACT ASSESSMENT

This policy is aimed at keeping all users within the boundaries of copyright law, raising awareness of the limitations of the NHS Wales copyright license and what that means when using AI tools.

This policy is also aimed at keeping licenced users within the boundaries of wider NHS Wales policies for internet and data security within the organisation, particularly with relation to AI tools.

These factors apply to all Copyright Licence Plus licenced users regardless of background, circumstance, or any protected characteristics.

9. DEFINITIONS

TERM	DEFINITION
Artificial Intelligence (AI)	the theory and development of computer systems able to perform tasks normally requiring human intelligence, such as visual perception, speech recognition, decision-making, and translation between languages.
Data Extraction	The process of retrieving information from one or more sources for processing, analysis, critical appraisal, or as supporting evidence
Evidence Screening	The process of identifying and selecting relevant studies based on pre-defined criteria, to answer a specific research question
Machine Learning (ML)	Machine learning (ML) is a branch of artificial intelligence (AI) and computer science that focuses on the using data and algorithms to enable AI to imitate the way that humans learn, gradually improving its accuracy.
Generative AI	AI that can generate content, such as text, image, or sound.
Multimodal AI	AI which combines multiple data types with multiple algorithms to improve performance.
Speech-based AI	AI that facilitates communication between human voice and a computer
Text-based AI	AI that focuses on understanding and/or reproducing human-like text
Quantitative-based AI	AI that focuses on the processes of numerical data
Image-based AI	AI technology that can discern data from, and/or produce images.

10. GETTING HELP

For support or clarification regarding this policy, contact the NHS Wales e-Library: elibrary@wales.nhs.uk or speak to your local NHS Wales Library and Knowledge Service, Public Health Wales Evidence Service or Social Care Wales Evidence Service.

11. RELATED POLICIES

See References

12. INFORMATION, INSTRUCTION, TRAINING

Artificial Intelligence (AI) - e-Library for Health (nhs.wales)

Principles for Copyright & Generative AI | Policy Framework | CLA

AI and Digital Regulations Service for health and social care

Artificial intelligence | ICO

A guide to using artificial intelligence in the public sector - GOV.UK (www.gov.uk)

AI Regulation - NHS AI Lab programmes - NHS Transformation Directorate

Acceptable Use Policy updated to include GenAI

13. MAIN RELEVANT LEGISLATION

Copyright law

UK GDPR and the Data Protection Act 2018.

Artificial Intelligence (AI) and digital regulations service

Generative AI Framework for HMG

NHS Wales All Wales Information Governance Policy

NHS Wales Information Security Policy

MHRA Impact of AI on the regulation of medical products

A pro-innovation approach to AI regulation: government response - GOV.UK

14. Appendix A - Other types of AI

- Multimodal AI – Uses multiple unimodal neural networks in combination to achieve results that single-modality AI could not. Some example applications include:
  - Customer Service Chat Bots
  - Security detection
  - Improved analysis and response to complex healthcare queries
- Speech-based AI – Technology such as Siri and Alexa that enhance voice activated assistants
- Text-based AI – Focuses on Natural Language Processing (NLP) to read and write large amounts of text in a "human-like" manner
- Quantitative-based AI – Uses machine learning to process and analyse large volumes of numerical data
- Image-based AI – The technology capable of mimicking artists style to produce images based on text prompts and the sample imagery the AI tool was provided