7 March 2024

Dear ██████████,

Freedom of Information request: FOI2024/00108

Thank you for your Freedom of Information request received on the 8 February in which you requested the following:

Your request:

This FOI request relates to the use of Generative Artificial Intelligence (GenAI) and/ or Large Language Models (LLMs) against people's data as part of research funded by UKRI, including its seven Research Councils, Innovate UK and Research England.

- *The request covers 1st January 2020 to the current date.*
- *It includes grants that have been awarded and proposals approved for award which are not yet public or have yet to have contracts completed – collectively referred to as 'awards'/ 'funded research' herein.*
- *'People's data' herein encompasses participant data gathered as part of the funded research, secondary data analysis involving human participants' data, and data available online about individuals – for example, via social media platforms and public records that are visible online.*
- *'Assessment process' refers to the funder's process of assessing a submitted proposal for funding.*

Answers should be provided (i) at UKRI level, and (ii) broken down by Research Council – i.e. – AHRC, BBSRC, ESRC, EPSRC, Innovate UK, MRC, NERC, Research England, STFC.

1) *How many awards include plans to use GenAI/ LLMs against people's data?*
2) *Which UK universities hold awards as the lead institution on funded research involving the use of GenAI/ LLMs against people's data?*
3) *What methodological approaches have been described to the use of GenAI/ LLMs against people's data as part of funded research? – for example, generating new data from existing participant data, writing reports, analysis of qualitative data.*

Data management plans

4) *For awards that document the planned use of GenAI/ LLMs against people's data:*

   a) *What percentage of awards reflect this use in the associated data management plan?*
   b) *Is the data management plan explicitly reviewed in relation to the use of GenAI/ LLMs against people's data as part of the assessment process? If so, please provide a high-level summary of this review process.*
   c) *If data management plans are not explicitly reviewed in relation to the use of GenAI/ LLMs against people's data, what plans exist to introduce this review process in future?*

Ethics and responsible research and innovation (Ethics & RRI)

5) *For awards that document the planned use of GenAI/ LLMs against people's data:*
   a) *What percentage of awards consider Ethics and RRI in relation to this use within the application?*

b) *Are Ethics and RRI explicitly reviewed in relation to the use of GenAI/ LLMs against people's data as part of the assessment process? If so, please provide a high-level summary of this review process.*
c) *If Ethics and RRI are not explicitly reviewed in relation to the use of GenAI/ LLMs against people's data, what plans exist to introduce this review process in future?*

Our response

I can confirm that UK Research and Innovation (UKRI) does hold information which is relevant to your request, however, this is not in the form you have requested.

While UKRI does fund research and innovation in Artificial Intelligence (AI) the research portfolio is not classified in a way that would allow us to identify studies involving the 'use of Generative Artificial Intelligence (GenAI) and/ or Large Language Models (LLMs)' nor whether these tools were used to analyse 'people's data' as part of the study.

As currently framed for us to respond to your request would require the creation of a new portfolio of research on the use of Generative AI and /or Large Language Models. While this would be informed by the wider portfolio of AI research this would involve significant time to develop and validate, which would exceed the appropriate statutory limit as specified within Section 12 of the FOIA. Further information is provided below on the appropriate limit.

However, we have provided information on how we work in AI, including how responsible innovation is considered.

UKRI funds a broad AI portfolio of over £1bn. This portfolio spans UKRI's remit and is funded and managed by colleagues from all UKRI's constituent councils except Research England, which does not have its own research remit.

UKRI's AI portfolio is wide-ranging, covering technologies which include but are not limited to large language models. It also includes:

- Foundational research on AI technologies
- Societal and security implications of AI
- Applications of AI to other areas of research
- Scaling, commercialisation, adoption and diffusion of AI across businesses and sectors

UKRI-funded research on generative AI and large language models (LLMs) includes work on aspects of their development, use and application, in addition to sociotechnical reviews of their integration with society. We would note that large language models are relatively new in terms of their implementation and use within the academic community. However, we have made several recent investments in this area, and particularly in responsible, trustworthy, and safe AI more generally. Details of all this funding can be found on Grants on the Web[1] or Gateway to Research[2], and include:

- AI hub in generative models[3] – University College London
- Several projects relating to generative AI funded through AHRC's Bridging Responsible AI Divides (BRAID) programme[4]
- The Responsible AI UK[5] consortium
- The Alan Turing Institute[6]

Given the significant amount of time taken for grant applications to be first developed by researchers and then processed and peer reviewed by UKRI, it may take some time for the heightened interest around the potential of LLMs to become embedded in our research grant portfolio. While there is some anecdotal evidence that some larger grants (for example in EPSRC's portfolio) are utilising their flexibility to investigate this area, we have only begun to see project-based grants utilising LLMs for applications to science and research-based problems relatively recently.

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[1] https://gow.epsrc.ukri.org/NGBODefault.aspx
[2] https://gtr.ukri.org/
[3] https://www.ukri.org/news/100m-boost-in-ai-research-will-propel-transformative-innovations/
[4] https://www.ukri.org/news/100m-boost-in-ai-research-will-propel-transformative-innovations/
[5] https://www.rai.ac.uk/
[6] https://www.turing.ac.uk/

We take extremely seriously the importance of AI that is responsible, trustworthy, safe and explainable in design and use. We have incorporated considerations of responsible AI into funding opportunity guidance and assessment criteria for recent investments, for example the UKRI AI CDTs[7]. As a condition of funding of these centres, students must receive training in responsible innovation, and CDT applicants were expected to include as part of their application[8] a mandatory statement detailing how they will provide students with training in responsible AI. Each centre's approach to embedding this training and how it thought about safe AI development were part of the criteria for award and examined at interview. Similarly, the funding opportunity guidance for our recently-funded AI hubs (real data and science & engineering[9] and mathematical and computational foundations of AI[10]) stated that "the hubs will be required to embed principles of responsible innovation and those of trusted research throughout their activities and will be expected to engage with the relevant regulatory bodies where concerns may arise under the National Security and Investment Act. Aspects of bias, privacy, security and ethics should be considered where appropriate." Applicants' plans to embed the principles of responsible innovation and trusted research throughout hub activities formed part of the assessment criteria. We endeavour to ensure these principles are embedded across our entire AI portfolio and are committed to working to the best practices of good data management and in the responsible design and use of AI systems in research we fund.

Recognising that this is an area of particular interest, UKRI colleagues working across our AI portfolio would be happy to engage in further discussions around generative AI and LLMs, or indeed any aspect around our approach or how we might engage you with our funded portfolio. EPSRC's AI & Robotics team can be contacted at ai.robotics@epsrc.ukri.org and can direct enquiries to the relevant UKRI colleague.

The appropriate limit and the creation of a specific portfolio of Generative AI and /or Large Language Models research projects using people's data

As noted above the creation of a new portfolio of research and innovation funding involving the use of Generative AI and /or Large Language Models would exceed the appropriate statutory limit as specified within Section 12 of the FOIA, which for UKRI is set at £450. This represents the estimated cost of 18 hours of staff resource on locating, retrieving and extracting the information. Further detail is provided below.

We have determined that to gather this information it would be necessary to manually interrogate the AI funding portfolio and manually access and extract the information from each award. In the case of the AI funding portfolio for the time period specified the number of awards exceeds 500. This figure represents only the grants awarded since 1st Jan 2020 and does not include any grants which were already active before this date. Due to the volume of awards involved this would exceed the appropriate limit of 18 hours. This is based on an estimate of approximately 5 mins to find and extract the information from each award.

Consequently, UKRI is not obliged under Section 12 of the FOIA to process this section of your request further.

If you have any queries regarding our response or you are unhappy with the outcome of your request and wish to seek an internal review of the decision, please contact within the next 40 working days:

Head of Information Governance
Email: foi@ukri.org

Please quote the reference number above in any future communications.

If you are still not content with the outcome of the internal review, you may apply to refer the matter to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the review procedure provided by UKRI. The Information Commissioner can be contacted at: www.ico.org.uk.

If you wish to raise a complaint regarding the service you have received or the conduct of any UKRI staff in relation to your request, please see UKRI's complaints policy: https://www.ukri.org/about-us/policies-and-standards/complaints-policy/

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[7] https://www.ukri.org/news/ukri-invests-in-the-next-generation-of-ai-innovators/

[8] https://www.ukri.org/opportunity/ukri-centres-for-doctoral-training-in-artificial-intelligence/

[9] https://www.ukri.org/opportunity/artificial-intelligence-hubs-for-real-data-and-for-scientific-and-engineering-research/

[10] https://www.ukri.org/opportunity/mathematical-and-computational-foundations-of-artificial-intelligence/

Yours sincerely,

███████████
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