

AI Checklist

1. Governance & Leadership (CQC Well-Led)

- ☐ Names AI lead/SRO/DPO/DSPL in place
- ☐ Clear roles and responsibilities for AI oversight
- ☐ AI included in governance structure (risk register, board oversight etc.,)
- ☐ AI Policy or acceptable use guidance established
- ☐ AI use included in Data Protection and Privacy Policies
- ☐ AI systems recorded in an AI or Information Asset Register (IAR)
- ☐ Due diligence completed for AI suppliers
- ☐ Contracts include data protection and accountability clauses
- ☐ Understanding of where AI processing takes place (UK/Overseas)

2. Safety & Risk Management (CQC Safe)

- ☐ AI systems assessed using risk assessments or DPIAs
- ☐ Risks to service users clearly identified (e.g., wrong care advice)
- ☐ High-risk AI uses escalated and approved appropriately
- ☐ Human oversight in place for decisions affecting care
- ☐ Clear escalation routes if AI outputs appear incorrect
- ☐ Staff understand when **not** to rely on AI
- ☐ Process to log and investigate AI-related incidents or near misses
- ☐ Lessons learned fed into improvement processes

3. Data Protection & Information Governance (CQC Safe/Well-Led)

- ☐ Legal Compliance (UK GDPR)
- ☐ Lawful basis identified for any personal data processing
- ☐ Special category (health) data appropriately safeguarded
- ☐ Privacy notices include use of AI where relevant
- ☐ Data used in AI is accurate, relevant, and up to date
- ☐ Data minimisation principle applied
- ☐ No unnecessary sharing of sensitive data with AI tools
- ☐ AI systems covered by cyber security measures
- ☐ Access controls in place for staff using AI tools
- ☐ Awareness of risks like data leakage via generative AI

4. Fairness, Equality & Ethics (CQC Safe/Caring)

- ☐ Consideration of bias risks (e.g., impacting vulnerable groups)
- ☐ AI outputs reviewed for fairness where applicable
- ☐ Equality Impact Assessment (EqIA) completed if needed
- ☐ AI use aligns organisational values and care standards
- ☐ No fully automated decisions made without appropriate safeguards
- ☐ Respect for dignity, autonomy, and individual needs maintained

5. Transparency & Person-Centred Care (CQC Caring)

- ☐ Service users (or families) informed if AI significantly supports care
- ☐ Staff can explain in simple terms how AI is used
- ☐ Outputs from AI tools can be understood and challenged
- ☐ Clear guidance for staff on interpreting AI recommendations
- ☐ AI supports-not replaces-professional judgement
- ☐ Care decisions remain person-centred

6. Effectiveness & Quality (CQC Effective)

- ☐ AI tools tested or evaluated before use
- ☐ Evidence that tools are fit for purpose
- ☐ Ongoing monitoring of AI performance
- ☐ Checks for accuracy, reliability, and outcomes
- ☐ Regular review of whether AI improves care delivery
- ☐ AI systems updated or withdrawn if ineffective or unsafe

7. Responsiveness & Continuous Improvement (CQC Responsive)

- ☐ Staff can raise concerns or issues about AI use
- ☐ Feedback mechanisms in place for service users
- ☐ AI use reviewed when care needs change
- ☐ Systems adjusted to reflect real-world use and outcomes
- ☐ Continuous improvement approach in place
- ☐ Learning from incidents, audits, and performance reviews

Generative AI (e.g., ChatGPT)

- ☐ Clear rules on what staff can/cannot input (no personal data)
- ☐ Guidance on verifying outputs before use
- ☐ Staff trained on risks such as: Hallucinations, Data Leakage, Over-reliance
- ☐ Usage monitored and controlled

CQC Inspection Readiness - Quick Check

- ☐ List of AI systems (AI register)
- ☐ Risk Assessments (DPIAs)
- ☐ Policies and staff guidance in place
- ☐ Evidence of oversight (meetings, audits, spot-checks)
- ☐ Examples of safe, person-centred AI use