



[REDACTED]

26 February 2025

Dear [REDACTED]

Freedom of Information request: FOI2025/00054

Thank you for your Freedom of Information request received on the 20 January in which you requested the following:

Your request:

Project Reference 79327 was granted funding between September 2020 and June 2021. The project manager was Duncan White, who at the time was Company Secretary and a director of Climate Solutions Exchange Ltd.

The company, which is located six miles south of Barnard Castle in County Durham, was formed on 20 January 2020 with two founding directors, Andrew Howard and Sir Edward Milbank, Bt. Mr White was appointed on 17 April 2020 and was terminated as such on 30 April 2021. Mr Howard was the company's project manager for a further successful grant in 2022.

I'm writing to ask if you hold:

- 1. the application form that was submitted for the first grant. I believe it would have been sent to you in the four months between May and August 2020.*
- 2. I would like to know the date when it was submitted and when it was approved.*
- 3. I would also like to know if there were any supporting endorsements provided by third parties working in government departments or agencies or any reference made to such supporters in the application. I have in mind endorsements or support from the Office of the Prime Minister, the Cabinet Office, the Ministry of Defence, DEFRA, BEIS and the UK Space Agency in particular but not exclusively.*

Our response

I can confirm that UK Research and Innovation (UKRI) hold information relevant to your request. Please see the information below and attached.

- 1. the application form that was submitted for the first grant. I believe it would have been sent to you in the four months between May and August 2020.*

Please find attached a copy of the application proposal, "FOI2025-00054 – Application 79327_redacted".

Some of the information contained within the application form has been withheld from disclosure under the following exemptions of the FOI Act:

- Section 40 - Personal information
- Section 41 - Information provided in confidence
- Section 43 - Commercial interests

Section 40 – Personal information

We are exempting the names and contact details of individuals who have not already been disclosed in relation to this project under section 40(2) of the FOIA. Disclosing this information would contravene the first Data Protection Principle as defined under Section 86 of the Data Protection Act 2018 and Article 5 of UK General Data Protection Regulation (UK GDPR).

Section 40(2) is an absolute exemption and does not require a public interest test

Section 41 – Information provided in confidence

We have determined that the information you have requested falls under Section 41 of the FOIA, information provided in confidence. To explain further, organisations and individuals apply for funding in confidence and with the expectation that their bid information, including their applications, will be kept in confidence. If the information was released, we believe it would result in an actionable breach of confidentiality.

Section 41 is an absolute exemption and does not require a public interest test.

Section 43 – Commercial interests

We believe the information you have requested falls under the scope of Section 43(2) of the FOIA. This exemption is used where disclosure would likely result in a person's (an individual, a company the public authority itself or any other legal entities) commercial interests being prejudiced.

This is a qualified exemption, and a test was carried out to determine whether the public interest in maintaining the exemption outweighs public interest in disclosure.

Public interest in favour of disclosure

- There is a general public interest in the disclosure of this information to ensure transparency and openness of a public organisation.
- There is also a public interest in transparency in order to ensure the accountability of public organisations and how they spend public funding.

Public interest in favour of withholding the information

- The application contains commercially sensitive information such as salary information and business plans, such as cost and schedule information, technical project plan and extensive description of the project, which were disclosed to UKRI in confidence. The agreement we have with applicants is that we will not release any confidential information without their permission.
- Releasing the information in scope could be taken advantage of by competitors in planning competing strategies for further business opportunities. Applicants complete the application form knowing that if they achieve success only a brief overview of their successful bid will be publicly available, everything else will remain confidential.
- Innovate UK's competition process is highly competitive and composing a successful bid requires expertise and skill in providing quality information as well as understanding the most advantageous content to present in order to succeed. The applicant must also have the ability to support and justify the strength of their application. The applicant must do this whilst adhering within the strictly enforced scope and eligibility requirements of a particular competition. This knowledge is proprietary to the applicant. In addition, there are companies and consultancy groups that specialise in selling a grant writing service based on their grant writing expertise and knowledge. This exemplifies the commercial advantage and value that such expertise and skills deliver.

As such disclosing the information requested is likely to reduce the applicant's commercial advantage and thereby harm its commercial interests in a highly competitive field. We believe disclosing this information confers an advantage to competitors which would likely materially

disadvantage and harm the interests of the applicant, particularly in their ability to compete for grants.

- We follow the [government guidance on managing public money](#)¹. Standards expected of all public services include integrity, reliability, spending money in the public interest and achieving value for money. Our current thorough process ensures that only the best projects receive public monies. Releasing this information could jeopardize the fair and transparent competition process and undermine our function to fund the best projects. In turn, undermining this process would go against our responsibilities to manage our use of public funds.
- We also considered the impact on UKRI if commercially sensitive information of companies we and engage and work closely with were disclosed. We believe it would damage the trust in UKRI and likely impact our ability to carry out our role and manage our current and future investments.

Taking the above arguments into consideration, we reached the decision that the need for commercial confidentiality outweighs the public interest in disclosure; therefore the information is exempt from disclosure.

2. *I would like to know the date when it was submitted and when it was approved.*

This application was submitted on 06 August 2020 and funding was approved on 12 November 2020.

3. *I would also like to know if there were any supporting endorsements provided by third parties working in government departments or agencies or any reference made to such supporters in the application. I have in mind endorsements or support from the Office of the Prime Minister, the Cabinet Office, the Ministry of Defence, DEFRA, BEIS and the UK Space Agency in particular but not exclusively.*

There is no evidence of any such endorsements within the application for this project, therefore this information is not held.

If you have any queries regarding our response please do let us know. If you are dissatisfied with the handling of your request, you have the right to ask for an internal review, explaining which elements of this decision you disagree with and why. Internal review requests should be submitted within 40 working days of the date of our response and should be addressed to:


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 procedure](#)².

Yours sincerely,


Information Governance
Information Rights Team
UK Research and Innovation
foi@ukri.org | dataprotection@ukri.org

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/742188/Managing_Public_Money_MPM_2018.pdf

² <https://www.ukri.org/who-we-are/contact-us/make-a-complaint/#skipnav-target>