



[REDACTED]

17 January 2025

Dear [REDACTED],

**Freedom of Information request: FOI2024/01221**

Thank you for your Freedom of Information request received on the 14 December, and subsequent clarification, received 17 December, in which you requested the following:

**Your request:**

*I'd like to request records from UKRI regarding grant applications and correspondence with Dr. Andrew Przybylski of the Oxford Internet Institute.*

- 1. My specific request would be for successfully funded grant proposals made by the Oxford Internet Institute and Dr. Przybylski*
- 2. Any UKRI policies requiring the disclosure of potential conflicts of interest / additional funding.*
- 3. Any disclosures by the OII / Dr. Przybylski regarding other sources of funding for UKRI-supported work.*

**Your Clarification:**

*My assumption was that some of these items, if they exist, would have been attached to correspondence. I would happily accept any documents to start and drop the correspondence request.*

**Our response:**

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

- 1. Successfully funded grant proposals made by the Oxford Internet Institute and Dr. Przybylski*

We have identified three successful Economic and Social Research Council (ESRC) funded grant proposals made by the Oxford Internet Institute and Dr Andrew Przybylski:

- [ES/T008709/1](https://qtr.ukri.org/projects?ref=ES%2FT008709%2F1)<sup>1</sup> – “How Much is Too Much? Leveraging Existing and Emerging Large-Scale Social Data to Build Robust Evidence-Based Policy for Children in the Digital Age”
- [ES/W012626/1](https://qtr.ukri.org/projects?ref=ES%2FW012626%2F1)<sup>2</sup> – “Understanding Video Game Play and Mental Health”
- [ES/Y010736/1](https://qtr.ukri.org/projects?ref=ES%2FY010736%2F1)<sup>3</sup> – “Capturing the Digital Footprints of Video Game Play”

For each proposal, please find attached a Completed Proposal Form, Case for Support and any CVs submitted as part of the application.

We are exempting information relating to staff salary and working hours, as well as information contained in the CVs that is not already in the public domain, under section 40(2) of the FOIA. Disclosing this information would

<sup>1</sup> <https://qtr.ukri.org/projects?ref=ES%2FT008709%2F1>

<sup>2</sup> <https://qtr.ukri.org/projects?ref=ES%2FW012626%2F1>

<sup>3</sup> <https://qtr.ukri.org/projects?ref=ES%2FY010736%2F1>

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.

We also believe that information related to a project's financial costs and resources, and funding amounts not already in the public domain contained within CVs, 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**

- Project applications contain commercially sensitive information such as salary information and project costs which are disclosed to UKRI in confidence. The agreement we have with grant applicants is that we will not release any confidential information without their permission. Releasing this information could be taken advantage of by competitors in competing strategies for further funding opportunities.
- Disclosing information on project costs is likely to reduce the applicant's commercial advantage and thereby harm their 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 successful grant applicants, particularly in their ability to compete for grant funding.
- Releasing information of funding amounts provided by private funders could damage the relationship between funders and Higher Education Institutes (HEIs), making it more difficult to raise funds from private funders in the future. Private funders often expect privacy and confidentiality, and some prospective funders will only provide this if this confidentiality can be maintained. Breaching this expected confidence would damage relationships and pose a general risk to the HEI's ability to raise funds from private sources.
- HEI's ability to obtain private funding, are used to supplement public funding and support teaching, research and related activities, including the provision of bursaries for students and activities to widen access. High standards of teaching and research benefit the UK's economy and enhance the UK's international standing and reputation by attracting students and researchers from overseas to work in the UK. The maintenance of these standards would be at risk if the ability to attract private funding was diminished.
- We follow the government guidance on [managing public money](https://assets.publishing.service.gov.uk/media/65c4a3773f634b001242c6b7/Managing_Public_Money_-_May_2023_2.pdf)<sup>4</sup>. 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 organisations 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.

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<sup>4</sup> [https://assets.publishing.service.gov.uk/media/65c4a3773f634b001242c6b7/Managing\\_Public\\_Money\\_-\\_May\\_2023\\_2.pdf](https://assets.publishing.service.gov.uk/media/65c4a3773f634b001242c6b7/Managing_Public_Money_-_May_2023_2.pdf)

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.

In addition, we have determined that the withheld information also 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. These expectations are set out in the 'Confidentiality' section of [Use of Grant Proposal & Training Grant information addendum](#)<sup>5</sup>.

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.

## *2. Any UKRI policies requiring the disclosure of potential conflicts of interest / additional funding.*

UKRI policies relating to the disclosure of potential conflicts of interest can be found in the following documents:

- [Declaration of interests: guidance for assessors, reviewers and panellists](#)<sup>6</sup>
- Section RGC 3 Research Governance of the [UKRI FEC grants: standard terms and conditions of grant and grant guidance documents](#)<sup>7</sup>
- [Declaration of Interests: Applicants](#)<sup>8</sup>

## *3. Any disclosures by the OII / Dr. Pryzbylski regarding other sources of funding for UKRI-supported work.*

Information regarding other sources of funding for these projects is not held by UKRI and ESRC.

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](mailto: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](http://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](#)<sup>9</sup>.

Yours sincerely,

  
Information Governance  
Information Rights Team  
UK Research and Innovation  
[foi@ukri.org](mailto:foi@ukri.org) | [dataprotection@ukri.org](mailto:dataprotection@ukri.org)

<sup>5</sup> <https://www.ukri.org/wp-content/uploads/2021/03/UKRI-310321-Use-of-grant-proposal-and-training-grant-information-addendum-V2.pdf>

<sup>6</sup> <https://www.ukri.org/publications/ukri-declarations-of-interest-policy-and-guidance/declaration-of-interests-guidance-for-assessors-reviewers-and-panellists/>

<sup>7</sup> <https://www.ukri.org/publications/terms-and-conditions-for-research-grants/>

<sup>8</sup> <https://www.ukri.org/wp-content/uploads/2020/11/UKRI-261120-Declaration-of-Interests-for-applicants-v2.pdf>

<sup>9</sup> <https://www.ukri.org/who-we-are/contact-us/make-a-complaint/#skipnav-target>