



[REDACTED]

17 June 2026

Dear [REDACTED]

**Freedom of Information request: FOI2026/00332**

Thank you for your Freedom of Information Act (FOIA) request received on the 17 April in which you requested the following:

**Your request:**

*In your previous response (FOI2026/00223), you stated that "As a delivery partner, UKRI makes suggestions which OLS uses in their decision making" specifically regarding the development of reporting and monitoring requirements.*

*I am writing to request:*

*All correspondence, briefing notes, or formal submissions sent by UKRI (including but not limited to the Medical Research Council) to the Office for Life Sciences (OLS) between November 2025 and the date of this request regarding suggested Key Performance Indicators (KPIs) or monitoring metrics for the "Replacing animals in science" strategy.*

*Minutes of any meetings between UKRI and OLS where the "phase-out" progress metrics or KPI development were discussed.*

**Our response:**

I can confirm that UK Research and Innovation (UKRI) does hold some information relevant to your request.

Five items of email correspondence and seven attachments have been identified as within scope and are provided in attachment "*FOI2026\_00332 Annex 1\_Redacted*".

A number of the attachments to these emails were identified as not in scope, as they did not relate to discussions regarding KPIs or monitoring metrics. These attachments have, therefore, not been provided.

The names, job titles and contact information of individuals are considered to be personal data, and exempt 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.

Some of the information contains links to online meetings. These have been redacted as we consider that releasing this information would prejudice the prevention or detection of crime, as per Section 31(1)(a) of the FOIA. However, we believe these redactions do not detract from the content or understanding of the information provided. Section 31(1)(a) is a qualified exemption and therefore subject to a public interest test. UKRI applied the Public Interest Test to this request as set out below:

*Public interest in favour of disclosure:*

- There is a public interest in favour of release of the information, to uphold the principles of transparency and accountability.

*Public interest test in favour of withholding the information:*

- The release of this information would make UKRI more vulnerable to crime, specifically a malicious attack on UKRI's computer infrastructure and systems.
- There is an overwhelming public interest in keeping public authority computer systems secure, which would be served by non-disclosure.
- We believe that disclosing this information would not provide any material benefit or greater insight into the information already being disclosed in this response.

UKRI has concluded that, on balance, the public interest is better served by withholding the selected information under Section 31(1)(a).

One item of correspondence, two attachments and three related draft documents have been identified as containing information that is considered to be exempt from disclosure under Section 36(2)(b)(ii) of the FOIA. This is the exemption where disclosure would, or would be likely to, inhibit the free and frank exchange of views for the purposes of deliberation.

*Outcome of consideration of Section 36 – Prejudice to the effective conduct of public affairs*

For Section 36, the opinion of UKRI's Chief Executive Officer, as UKRI's Qualified Person has been sought. As this is a qualified exemption, we were then required to consider the public interest both in favour of, and against, releasing the information.

UKRI's Qualified Person's opinion was that Sections 36(2)(b)(ii) of the FOIA would be engaged as disclosure would inhibit the free and frank exchange of views for the purposes of deliberation.

"Replacing animals in science: A strategy to support the development, validation and uptake of alternative methods" is a UK Government policy, published in November 2025, that sets out a long-term, system-wide plan to reduce and ultimately phase out the use of animals in scientific research and testing, replacing them with modern, non-animal methods wherever possible.

The strategy has committed to develop and publish a set of qualitative and quantitative KPIs to measure the success of delivering its objectives. The OLS is the budget holder for the activities within the strategy, OLS also own the strategy and its reporting, and are responsible for establishing KPIs. As delivery partners, UKRI through MRC and NC3Rs, provide advice to OLS, which may inform the decision-making process.

KPIs are currently being developed and are expected to be published later in 2026, as confirmed in the response to a [parliamentary question in April 2026](https://questions-statements.parliament.uk/written-questions/detail/2026-04-15/127641/)<sup>1</sup>. As this is an ongoing process the free and frank exchange of views is essential to enable OLS to develop KPIs, in consultation with UKRI and supported by appropriate advice while protecting the quality and integrity of decision-making. This policy area involves balancing a number of sensitive issues, where it is important for officials and advisers to have a safe space to discuss ideas candidly during its development.

As it is expected that the policy will be published towards the end of the year, disclosure at this stage would be likely to inhibit those discussions. Participants may temper their views if they expect them to be made public before conclusions have been reached, which would undermine robust challenge and, ultimately, the delivery of the best outcomes.

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<sup>1</sup> <https://questions-statements.parliament.uk/written-questions/detail/2026-04-15/127641/>

As Section 36 is a qualified exemption, a test was required to determine whether the public interest in maintaining the exemption outweighs public interest in disclosure. The public interest test was conducted by a senior manager, who was not directly involved in the matters that were the subject of your request.

*Public interest in favour of disclosure:*

- There is a considerable amount of public interest in the development of the “Replacing animals in science” strategy and understanding how the progress towards its goals are being measured and monitored.
- Substantial public funds have been committed to the actions outlined in the strategy. There is a clear public interest in demonstrating the effectiveness and allocation of UKRI and OLS funding.
- There is a requirement for UKRI and OLS to be open, transparent and accountable in its processes and the funding decisions that it makes.

*Public interest in favour of withholding the information:*

- For UKRI to effectively contribute to the uptake of alternative methods to replace the use of animals in science, the safe space for purposes of deliberation, and to seek and provide advice, and the opinions of stakeholders is essential. The disclosure of the information and views provided would have a ‘chilling effect’ on both the timeliness and candour of the discussions and on the ongoing process, and potentially impact on similar future exercises.
- Without this protected safe space, the chilling effect would significantly increase the risk that discussions and decisions around the KPIs would be substantially less well-informed, hindering the effective operation of this process, which is crucial to the effective conduct of public affairs.
- More broadly, disclosure of ongoing discussions can cause a chilling effect on deliberation, inhibiting officials and advisers from expressing candid, exploratory, or controversial views. Participants may become more guarded, risk averse, or self-censoring if they expect drafts or informal exchanges to be made public. This is particularly acute where options are still being tested or rejected and where advice includes critique, speculation, or politically sensitive considerations. Premature disclosure would reduce the candour necessary for robust policy development, leading to poorer-quality decisions.
- As the KPIs are still being developed and not yet agreed there is a real and current risk to prejudicing policymaking process. Disclosing information about these ongoing discussions at this stage could lead to misinterpretations and premature conclusions, potentially influencing the conclusion of these processes. It could also mislead stakeholders and the public, causing unnecessary concern, prejudicing the effective conduct of public affairs an ongoing issue. Where positions can be fluid and not settled, disclosure risks premature external scrutiny before conclusions are reached.
- Disclosure may also affect negotiations, partnerships, or stakeholder engagement. External actors may seek to influence or exploit partial information which can lead to real-world prejudice to development or delivery. This is especially relevant due to the nature of the work.

Overall, UKRI considers that on this occasion the public interest is best served by maintaining the exemption, and therefore the relevant information has been withheld from disclosure.

The minutes of meetings between UKRI and OLS within the request timeframe do not include discussions on KPI development or progress metrics, therefore UKRI does not hold any meeting minutes that fall within scope of your request.

## **Your rights**

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>2</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)

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