



[REDACTED]

12 April 2022

Dear [REDACTED],

**Freedom of Information request: FOI2022/00060**

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

**Your request:**

1. *How many Monitoring Officers does IUK currently engage?*
2. *What total grant funds do they supervise?*
3. *Do Monitoring Officers have to register (a.) their other business and financial interest, and (b.) any conflicts of business and financial interests?*
4. *Please publish both registers.*
5. *What is the job description and set of ethical responsibilities of Monitoring Officers? Please publish.*

**Our response:**

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

1. *How many Monitoring Officers does IUK currently engage?*

Innovate UK (IUK) currently has 154 Monitoring Officers (MOs) active on live projects.

2. *What total grant funds do they supervise?*

At the current time not all live projects have been assigned an MO, therefore the total grant funds being supervised by the 154 active MOs is £4,752,557,884. This relates to 5,385 projects, including those in start up phase.

3. *Do Monitoring Officers have to register (a.) their other business and financial interest, and (b.) any conflicts of business and financial interests?*

MOs are required to register conflicts of interest only. IUK ask for an MO to register conflicts of interest each time they bid for a project and these are recorded within the 'Monitoring Officer Community' system that is used to assign MOs to projects. Should there be any identified conflict of interest, they are not offered the project.

The MO also list their relevant skills and experience and this is reviewed by the internal teams and accepted or rejected as appropriate.

#### 4. *Please publish both registers.*

Registers are not held for MO's business and financial interests, or conflicts of interest. As described in Q3, conflicts of interest are held within the 'Monitoring Officer Community' system and would require the data to be manually reviewed and extracted individually for each MO.

However, we also 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 or the public authority itself or any other legal entities) commercial interests being prejudiced.

This is a qualified exemption, meaning that a test was carried out to determine whether the public interest outweighs the requirement for commercial confidentiality.

##### **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.
- It would be in the public interest to view the conflicts of interests of MOs as public monies are used to fund the activities that they monitor. As this is the case it is important that the programme has a positive impact and is beneficial to all parties involved. Seeing details of their conflicts of interests enables the public to independently assess the impact of the projects that are being funded.

##### **Public interest in favour of withholding the information**

- MOs are not employees of IUK or UKRI and therefore releasing these details would constitute the disclosure of 3<sup>rd</sup> party information and prejudice the commercial interests of those individuals.
- MOs would not expect this information to be disclosed in this manner, as it was not provided to IUK or UKRI for this purpose.
- Releasing information provided in confidence to UKRI is likely to damage the possibility of ongoing relationships with other organisations. Relationships may become untenable if third parties cannot be certain that their commercial information will remain confidential when held by UKRI.
- Breaching the commercial interest may also adversely affect future negotiation opportunities for UKRI. UKRI may be seen as a 'confidentiality' risk if it routinely releases information relating to business arrangements into the public domain, particularly where this is third party information.
- We also considered the impact on UKRI if commercially sensitive information of companies and individuals 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.

We have also determined that the information you have requested falls under Section 41 of the FOIA, information provided in confidence. As explained above, 3<sup>rd</sup> parties would have disclosed their business and financial interests to us in confidence as part of the requirement to disclose any potential conflicts of interest. If the information was released, we believe it would result in an actionable breach of confidentiality.

As this exemption is absolute there is no requirement to conduct a public interest test.

#### 5. *What is the job description and set of ethical responsibilities of Monitoring Officers? Please publish.*

MOs have a contractual relationship with IUK and are not considered to be members of staff or to be working directly for IUK. As such a 'job description' or 'set of ethical responsibilities' is not held for an MO.

In general, the MO is responsible for tasks falling within six work categories:

- Overall assurance and technical support
- Project start-up phase approval
- Periodic reviews, meetings and reporting
- Claim approval
- Issue and change management
- Project completion

Whilst the nature of the MOs responsibilities is broadly the same for all projects, the extent of the monitoring requirements (including the frequency of monitoring) will differ depending on whether a project is classified as requiring a gold, silver, or bronze monitoring service level, this is derived from the technology area of the competition.

There are different MO requirements which are dependant on the project competition scope, these differences can range from additional meetings, to focused expertise and detailed review on certain activities. Any specific differences to the standard monitoring will be included in the project brief, when the MO is applying for the contract.

Projects are classified for monitoring service level purposes before the contract for monitoring services for that project is tendered so that the level of support required for a project is clearly defined within the candidate project brief.

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:

Head of Information Governance

Email: [foi@ukri.org](mailto:foi@ukri.org) or [infogovernance@ukri.org](mailto:infogovernance@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: <http://www.ico.gov.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/>

Yours sincerely,

  
Information Governance  
Information Rights Team  
UK Research and Innovation  
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