



[REDACTED]

4 March 2021

Dear [REDACTED],

Freedom of Information request: FOI2021/00023

Thank you for your Freedom of Information request received on the 8 January in which you requested the following:

Your request:

I write to request access to the grant application and associated documents relating to the 'Unwrapping the Galloway Hoard' project.

Our response:

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

The following documents have been identified to be within scope of your request:

Document Name	Content	Outcome	Exemptions Applied
Case for Support	Research questions or problems, context, methods, timescales, project milestones, workflow, management, dissemination and essential references	Partially supplied (pp 1,2 & 7 redacted, pp 3-6 withheld)	S40, S41, S43
Data Management Plan	Data summary, collection, storage and sharing practice	Withheld	S31, S41, S43
Goldberg CV	Curriculum Vitae of Dr Martin Goldberg	Withheld	S40, S41
Harris CV	Curriculum Vitae of Dr Susanna Harris	Withheld	S40, S41
Harris Publications	Selected publications of Dr Susanna Harris	Supplied	-
Impact Plan	Public engagement, impact for the third sector, museums and galleries and impact milestones	Withheld	S41, S43
Justification for Resources	Staff costs, travel and subsistence, specialist resources, public engagement, dissemination and other resources	Withheld	S41, S43
Lab Consumables	Costs and number of units	Withheld	S41, S43
Makin CV	Curriculum Vitae of Dr Alexandra Makin	Withheld	S40, S41
Makin Publications	Selected publications of Dr Alexandra Makin	Supplied	-
Offer Acceptance	Offer acceptance details and combined funding scheme schedule	Supplied (redacted)	S41, S43
Offer Document	Funds awarded, staff summary, staff and investigator details, grant, call and research council conditions	Supplied (redacted)	S40, S41, S43
PI response	Principle Investigators response to peer reviews	Withheld	S41

Proposal form	Applicant details, objectives, summary, outputs of research, academic beneficiaries, impact summary, summary of resources required, other support, staff details, travel and subsistence and other directly incurred costs and the proposal classification	Supplied (redacted)	S40, S41, S43
Publications	Selected publications of Dr Martin Goldberg	Supplied	-
Review 1	Peer review	Withheld	S41
Review 2	Peer review	Withheld	S41
Review 3	Peer review	Withheld	S41
Visual Evidence	Pictures of six items discovered as part of the project	Supplied	-

Explanation of Exemptions Applied:

Section 40

We are exempting the names, salary, employment details and curriculum vitae of individuals 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 EU General Data Protection Regulation (GDPR) 2016.

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

Section 41

We have determined that some of the information you have requested falls under Section 41 of the FOIA, information provided in confidence.

To explain further, organisations apply for funding with the Arts and Humanities Research Council (AHRC) in confidence and with the expectation that their bid information, including their application, will be kept in confidence. In addition, peer reviews are conducted with the understanding that comments and recommendations will remain confidential.

Therefore, if this 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.

Section 43

We believe some of 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 organisation, 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 information requested as public monies are used to fund this activity. As this is the case it is important that the programme has a positive impact and is beneficial to all parties involved. Seeing copies of the information requested enables the public to independently assess the impact of the project.

Public interest in favour of withholding the information:

- Some of the information requested contains commercially sensitive information such as salary information and projects plans, cost and schedule information and an extensive description of the project which are disclosed to UKRI in confidence. The agreement we have with project applicants is that we will not release any confidential information without their permission. Releasing the information requested could be taken advantage of by competitors in planning competing strategies for further funding 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.
- AHRC'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 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 the applicants, particularly in their ability to compete for grants.
- We also considered the impact on UKRI if commercially sensitive information of organisations we 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.

Section 31

Releasing the information regarding the storage location of data in the "*Data Management Plan*" would prejudice the prevention or detection of crime as per Section 31(1)(a) of the Freedom of Information Act.

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, in disclosing information about government or public authority infrastructure and contracts

Public interest test in favour of withholding the information:

- The release of this information would make the project more vulnerable to crime
- The crime in question would be the potential theft of digital data
- The release of this information would be seen to prejudice the prevention or detection of crime, by identifying the methods being used to record and store digital data related to the project and therefore facilitate the possibility of a criminal offence being carried out
- There is an overwhelming public interest in ensuring the security of this data, which would be served by non-disclosure.

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

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 or 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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