UK Research and Innovation

[redacted]

12 October 2026

Dear [redacted]

Freedom of Information request: FOI2026/00606

Thank you for your Freedom of Information request received on 20 July, we apologise for the delay in issuing this response. Your request and subsequent clarification of 11 August are copied below for reference:

Your request:

I request copies of recorded information held by UK Research and Innovation and/or the Science and Technology Facilities Council relating to LumiAIres Ltd in connection with the Higgs Centre for Innovation, for the period 1 September 2024 to the date of this request.

Specifically, I request:

1. Applications, proposals or expressions of interest submitted by or on behalf of LumiAIres Ltd relating to incubation, residency, technical support or participation in programmes operated through the Higgs Centre for Innovation.

2. Assessment reports, evaluation documents, scoring matrices, reviewer comments or technical assessments prepared in connection with those applications.

3. Due diligence reports, risk assessments or eligibility assessments relating to LumiAIres Ltd.

4. Records identifying the committees, panels or decision-making bodies that considered LumiAIres Ltd, including the dates of meetings at which the company was discussed.

5. Minutes, agendas, decision papers or briefing notes referring to LumiAIres Ltd.

6. Agreements relating to incubation, residency, access to facilities, technical support, mentoring or collaboration involving LumiAIres Ltd.

7. Progress reports, milestone reviews or monitoring reports concerning LumiAIres Ltd.

8. Correspondence (including email) between STFC personnel and representatives of LumiAIres Ltd concerning admission to the Higgs Centre, incubation, technical support, grant applications, or programme participation.

9. Correspondence between STFC and any of the following organisations relating to LumiAIres Ltd:
- *Scottish Enterprise*
- *Scottish Government*
- *UK Space Agency*
- *Space Scotland*

To assist in keeping this request within the statutory cost limits, I am content for email searches to be limited to

staff directly involved in the Higgs Centre for Innovation, business incubation, innovation programmes or related management functions.

Following our request for clarification on 11 August, your request was confirmed as follows:

Please therefore treat the following as my revised request, covering the period 1 September 2024 to 20 July 2026:

1. Support / programme
Please identify the programme, scheme, incubation arrangement, or other form of support provided by STFC/UKRI through or in connection with the Higgs Centre for Innovation in which LumiAIres Ltd participated or was considered.

2. Application / proposal
The final version of any application, proposal, expression of interest, or equivalent document submitted by or on behalf of LumiAIres Ltd in relation to that support.

3. Assessment and due diligence
The final versions of any assessment, evaluation, due diligence, eligibility assessment, scoring record, or equivalent document used by STFC/UKRI in considering LumiAIres Ltd for that support.

4. Decision-making
The final decision paper, recommendation, approval record, or equivalent document relating to the decision to provide or approve that support.

5. Decision meeting
The name of the committee, panel, or other decision-making body responsible for the decision, together with the date of the meeting at which LumiAIres Ltd's application or support was considered. I also request the relevant final minutes or decision record for that meeting, limited to the portion concerning LumiAIres Ltd.

6. Terms and monitoring
The final version of any agreement, terms of support, milestone plan, or monitoring arrangement applicable specifically to LumiAIres Ltd.

I am excluding correspondence and email searches from this revised request.

I am also requesting final versions only, rather than drafts, working papers, comments or supporting correspondence.

Where information is considered exempt, please provide the remainder of the document with appropriate redactions wherever reasonably practicable, and identify the exemption relied upon.

My primary interest is understanding what criteria were applied, how LumiAIres Ltd was assessed against those criteria, who made the decision, and what the decision was based upon.

Our response

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

1. Support / programme

Please identify the programme, scheme, incubation arrangement, or other form of support provided by STFC/UKRI through or in connection with the Higgs Centre for Innovation in which LumiAIres Ltd participated or was considered.

The Higgs Business Incubation Centre scheme is operated by the Science and Technology Facilities Council (STFC) and supports early-stage companies through a range of business support services, mentoring

opportunities, and access to facilities designed to help businesses develop and grow. More information about the incubation scheme is available on the Higgs Centre for Innovation website.[1]

LumiAIres Ltd applied for and was accepted onto the scheme, with their participation in the scheme commencing on 1 March 2026, and their tenancy agreement for accommodation within the Higgs Centre for Innovation commencing on 2 March 2026.

A copy of the blank application form sent to LumiAIres Ltd is provided with this response as **FOI2026_00606 Annex 1**.

Questions 2, 3, 4 and 6

2. Application / proposal
The final version of any application, proposal, expression of interest, or equivalent document submitted by or on behalf of LumiAIres Ltd in relation to that support.

3. Assessment and due diligence
The final versions of any assessment, evaluation, due diligence, eligibility assessment, scoring record, or equivalent document used by STFC/UKRI in considering LumiAIres Ltd for that support.

4. Decision-making
The final decision paper, recommendation, approval record, or equivalent document relating to the decision to provide or approve that support.

6. Terms and monitoring
The final version of any agreement, terms of support, milestone plan, or monitoring arrangement applicable specifically to LumiAIres Ltd.

I can confirm UKRI does hold information within the scope of your request. However, we consider the information to be exempt under the scope of Section 43(2) of the FOIA as it relates to Commercial Interests. 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.
- It would be in the public interest to view the application as public monies are used to fund this activity. Access to the information contained within the application may enable the public to independently assess the impact of LumiAIres Ltd work with the Higgs Centre for Innovation, and the impact of the programme and benefits to the parties involved.

Public interest in favour of withholding the information

- The application contains commercially sensitive information relating to business plans, financial information including revenue, project costs, delivery schedules, risk analysis, technical project plans and project descriptions which are disclosed to UKRI in confidence. Programme participants submit their proposals for the purposes of assessing a funding application. Disclosure would prejudice the commercial interests of LumiAIres Ltd by providing competitors with valuable insight into the applicant's business strategies, capabilities and areas of competitive advantage.

[1] https://www.higgscentre.org/business-incubation/

- STFC's assessment 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. Applicants must also have the ability to support and justify the strength of the application, while also adhering to the strictly enforced scope and eligibility requirements of the particular competition. This knowledge is also considered as proprietary to the applicant and exemplifies the commercial advantage and value that such expertise and skills deliver. As such disclosure may reduce LumiAIres Ltd's commercial advantage and harm its commercial interests in a highly competitive field. We considered this would similarly confer an advantage to competitors which would likely materially disadvantage and harm the applicant's interests, particularly in their ability to compete for grants.
- The assessment scoring sheets contain evaluative commentary, scoring rationales and detailed observations regarding the strengths and weaknesses of proposals. Disclosure would reveal commercially sensitive information about the application and s project that could be used to identify and exploit perceived weaknesses or replicate successful aspects of the proposal, thereby prejudicing the applicant's commercial interests.
- Any associated agreements or contracts contain detailed commercially sensitive information relating to project delivery, financial arrangements, contractual obligations, performance measures, intellectual property and negotiated terms. Disclosure would be likely to prejudice the commercial interests of both the company and UKRI by revealing information that could weaken future negotiating positions and provide competitors with insight into commercially negotiated arrangements.
- More broadly releasing information provided in confidence to UKRI is likely to damage ongoing relationships, which may become untenable and adversely affect future negotiation opportunities where third parties cannot be certain that their commercial information will remain confidential when held by UKRI.
- UKRI adheres to the government guidance on managing public money.[2] 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 at the present time 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.

Taking the above arguments into consideration, we have reached the conclusion that the need to protect commercial interests outweighs the public interest in disclosure, and that the information is exempt from disclosure.

5. Decision meeting

The name of the committee, panel, or other decision-making body responsible for the decision, together with the date of the meeting at which LumiAIres Ltd's application or support was considered. I also request the relevant final minutes or decision record for that meeting, limited to the portion concerning LumiAIres Ltd.

The decision relating to the application was made by the Higgs Business Incubation Centre (BIC) Selection Board, at a meeting held on 13 January 2026.

The attendance list is provided with this response as **FOI2026/00606 Annex 2.**

The names and contact information of individuals has been withheld under section 40(2) of the FOIA. We consider that 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.

With regards to decision-making records, please see the response to questions 2, 3, 4 and 6.

[2] https://assets.publishing.service.gov.uk/media/69e0b17861d2e8e9b9e42e13/Managing_Public_Money_-_April_2026.pdf

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

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[3].

Yours sincerely,

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

[3] https://www.ukri.org/who-we-are/contact-us/make-a-complaint/#skipnav-target