



[REDACTED]

14 April 2022

Dear [REDACTED],

Freedom of Information request: FOI2022/00107

Thank you for your Freedom of Information request received on the 21 March in which you requested the following:

Your request:

Throughout 2021, UK-CTAP were investigating drug candidates for COVID-19. To my knowledge, there has never been full disclosure of who sat on each subgroup panel. We have only the chairs for each panel. The process aimed to be transparent but we only have limited notes on how decisions were reached, never who formulated those decisions.

A recent document, "Therapeutics Advisory Panel for Pandemic Operating Model", suggests on page 3 that panel members should have 'no vested interests' but notes 'there will at times be conflicts of interest that will need to be managed. It is important to surface these conflicts of interest and manage them appropriately'

As such, please provide a full list of the CTAP panel membership throughout the 2021 decision-making process. Please include a full breakdown of membership, including who sat on the subgroup panels. Also please provide any conflicts of interest assessments that were surfaced and properly managed at the time.

Our response

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

To clarify, there were no CTAP sub-panels however there were expert subgroups who were not involved in decision-making but gave their expert opinion to a designated CTAP (full panel) member who presented the drug at panel.

Under Section 21 of the FOIA - Information already reasonably accessible, the information you have requested on UK-CTAP panel membership is already available in the public domain. Section 21 is an absolute exemption which means that there is no requirement to conduct a public interest test. UK-CTAP panel membership is available [here](#)¹.

We consider that the names of those who served on the expert subgroups and information on conflicts of interest falls under the exemption at section 40(2) personal data. Section 40(2) exempts personal information from disclosure if that information relates to someone other than the applicant, and if disclosure of that information would, amongst other things, contravene one of the data protection principles in Article 5(1) of the UK General Data Protection Regulation (UK GDPR) and section 34(1) of the Data Protection Act 2018. In this case, we believe disclosure would contravene the first data protection principle, which provides that processing of personal data is lawful and fair.

¹ <https://www.gov.uk/government/publications/covid-19-treatments-making-a-proposal-for-clinical-trials/guidance-making-a-proposal-for-covid-19-therapeutics-clinical-trials>

We have considered the legitimate interests of all parties in disclosure of this information and have found that on balance there is not an overriding legitimate interest in disclosure that outweighs the reasonable expectations of privacy of the individuals concerned. Section 40(2) is an absolute exemption and UKRI is not obliged to consider whether the public interest favours disclosing the information.

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,

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