

# Grants Programme

## Applicant's guide

### 2017/2018

## Introduction by Elizabeth Denham

I am delighted to introduce the guide to applicants for the new ICO grants programme and I am confident you will find it useful. The new ICO grants team have been hard at work creating a scheme that is practical, helpful and targeted.

Information Rights evolve with time. They evolve as the courts decide cases and set precedents. They evolve as the expectations that the public has change. And they evolve thanks to innovative and ground breaking ideas, research and products.

The new grants programme is designed to give practical research and policy a stronger voice in this evolution of Information Rights. I want to see the excellent research community in the UK grow and strengthen over the next four years. This grants programme is a vital part of our contribution to this aim.

This guide should be read alongside the new ICO Information Rights Strategic Plan. This sets out our priorities and provides helpful signposting for your research goals. At the core of our strategy is the objective of promoting trust for the public. Current research shows that 75% of the public don't trust the way that their personal data is used. I want to see that number reduce and that requires evidence of what is causing the problem and well considered ideas for how to address it.

I hope this guide will help you to come forward with your plans for creating the next evolution of Information Rights practice and that you see this as a helpful contribution to our mission.



**Elizabeth Denham**  
Information Commissioner

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## 1. About this guide

This guide provides applicants with details of the ICO Grants Programme and how to apply for funding. It also sets out our expectations should your application be successful. The detailed terms and conditions of the programme are set out in the [Grant Agreement](#) that each grant recipient will be required to sign if a proposal is approved.

## 2. What is the Grants Programme?

The ICO has introduced this Grants Programme to promote good practice; to support independent, innovative research and solutions focused on privacy and data protection issues. The Grants Programme supports the delivery of the [ICO Information Rights Strategic Plan 2017-2021](#). Eligible organisations are invited to bid for grants to facilitate independent research and projects. The minimum award will be £20,000 and the maximum award will be £100,000.

An explanation of who is eligible is set out below (7)

## 3. When will the Grants Programme go live?

June 2017.

We aim to open the call for proposals at least once a year. We may choose to open or close the application window based on the success of previous rounds. The programme is likely to last for the duration of the current Information Commissioner's tenure, until 2021.

## 4. ICO objectives for the Grants Programme

- Support and encourage research and privacy enhancing solutions in significant areas of data protection risk.
- Focus on projects that will make a real difference to the UK public.
- Increase awareness of privacy enhancing solutions with data controllers across the UK.
- Improve understanding of how individuals view privacy issues and interactions with new technologies, and promote better public awareness.
- Promote uptake and use of research results by the relevant end-users, including policy makers.
- Develop existing privacy research capacity in academic and not-for-profit sectors.

## 5. Research themes for 2017/2018 applications

The ICO is inviting applications for projects that meet one or more of the five strategic goals set out in our [Information Rights Strategic Plan](#). In particular, we are seeking proposals that align with goals one, two and four.

1. To increase the public's trust and confidence in how data is used and made available.
2. Improve standards of information rights practice through clear, inspiring and targeted engagement and influence.
3. Maintain and develop influence within the global information rights regulatory community.
4. Stay relevant, provide excellent public service and keep abreast of evolving technology.
5. Enforce the laws we help shape and oversee.

For 2017/18 we are seeking privacy by design or accountability solutions which focus on key privacy challenges or the implications of new technologies on privacy.

Examples of technologies we are interested in include big data, artificial intelligence, machine learning, social scoring and blockchain. We are also interested in projects that address the privacy challenges related to children and the internet. Examples of other challenges are contained in the Information Rights Strategic Plan or in recent ICO guidance.

Proposals do not need to be technology based but they must have practical application and provide real world solutions that are of clear public benefit to the UK.

## 6. Minimum Grant Standards

The Grants Programme will be run in line with our obligations as a public body to account for our expenditure and value for money. We have chosen to conduct the Grants Programme in accordance with the UK government's Minimum Grant Standards. These are the standards required when allocating public funds to grants schemes. Further details on the requirements can be found at [Grants Standards - GOV.UK](#).

## 7. Eligibility

In order to tap into the broadest range of expertise in this area, the scheme is open to both UK and international organisations. All proposals

must meet the objectives set out in section four, including the ability to deliver for UK individuals and organisations. We will not be able to consider proposals that seek to find a solution to data protection or privacy risks that do not impact on the UK.

Eligible applicants (whether lead or joint) can include:

- academic institutions;
- organisations with a genuine commitment to public benefit outcomes;
- trade and industry associations; or
- civil society groups.

Those who would not be eligible include:

- political parties and organisations;
- religious groups and organisations;
- current or former employees of the ICO;
- any individual who has been disqualified as a director in accordance with the Company Directors Disqualification Act 1986;
- any organisation or individual subject to insolvency or bankruptcy proceedings, including voluntary arrangements with creditors; or
- any organisation that has been the subject of an enforcement notice, monetary penalty notice or legal proceedings by the ICO Enforcement Department.

The lead applicant will have full responsibility for undertaking the project and must provide their contact details on the application form.

Unless there are exceptional circumstances, no more than one award will be made to any applicant in each funding round.

## 8. Duration of research project

All research proposals are expected to finish within the grant period set out in your Grant Agreement. This will normally be 12 months from the date of the first payment of funds. If you expect your project will run for longer than 12 months you must make this clear in your application and set out clearly why it cannot conclude within this time. In exceptional circumstances, grants may extend beyond 12 months with our prior written approval.

## 9. Allowable costs

The ICO will provide assistance with funding costs directly incurred by applicants in conducting and completing the proposed project. Such costs will include:

- salary for members of the project team;
- administrative, survey and publication costs;
- other costs including travel (reasonable costs only); and
- minor equipment, such as IT equipment and software necessary to complete the research project.

Any other costs will be subject to prior approval by the ICO.

We will not fund:

- membership of professional organisations or journal subscription fees;
- fellowships or PhD studentships;
- rent, purchase of accommodation or any other capital costs;
- the cost of purchase or hire of any vehicles;
- equipment which is more than 25% of the total amount awarded; or
- expenses incurred prior to or after completion of the funding period set out in the Grant Agreement.

You must provide detailed information about the funding costs and evidence confirming any funding or support received from elsewhere. All expenses must be reasonable and proportionate.

We are not presently in a position to fund any proposals that may amount to state aid. If you are unsure whether your proposal could fall within this classification, you should refer to the [State aid manual - GOV.UK](#) for further guidance.

## 10. Reporting requirements

You will be required to submit a progress and expenditure report on at least a quarterly basis. Details of when this is due will be set out in your Grant Agreement. We reserve the right to require you to attend a meeting to discuss any concerns we may have in relation to the successful completion of your project, at any time throughout the grant period.

The final report and expenses schedule must be submitted to us within three months of the end of your research project.

## 11. Data protection

All applicants must comply with the Data Protection Act 1998 and the EU General Data Protection Regulation, when it applies from 25 May 2018. (Detailed guidance can be found on our [website](#)). As a public authority we will, from time to time, be required to disclose information in accordance with the Freedom of Information Act 2000 and the Environmental Information Regulations. You may also be required to disclose information to us so we can fulfil these obligations. Full details of how we will use your information can be found on our [privacy policy](#).

As part of our obligations to provide guidance and promote good practice, we may require certain information produced using funding from this Grants Programme to be made available to the public under open licence. This will include the Open Government Licence and any other similar mechanisms in existence such as the Creative Commons platforms.

## 12. Safeguarding

All applicants whose projects are likely to include child or vulnerable adults are expected to have robust safeguarding policies in place, including up to date criminal records checks where appropriate.

## 13. Application process

Your ICO Grants Programme [application form](#) and supporting evidence must be submitted via email to [icograntsprogramme@ico.org.uk](mailto:icograntsprogramme@ico.org.uk) by the closing date and time specified in section 15.

All questions on the application form must be answered in full and any supporting evidence should be attached.

You will be required to submit a summary of your proposal with your application form, which is limited to 500 words.

We will need full contact details for your organisation and contact details for the lead applicant.

You must provide information to confirm the legal status of your organisation, including any registered charity or company registration numbers.

The application process:



- Initial sift of applications to determine those that meet the eligibility criteria. Applicants who are unsuccessful at this stage will be notified in writing
- 1<sup>st</sup> review - internal review of applications meeting the eligibility criteria. Initial recommendations for funding
- 2<sup>nd</sup> review – internal and external peer review panel. Final recommendations for funding
- Final decision by Information Commissioner or Deputy Commissioner
- Successful applicants notified in writing.

#### 14. **Assessment criteria for applications**

- Overall quality – the proposal has good overall quality and demonstrates a high standard of knowledge and understanding of relevant issues.
- Relevance and timeliness – the proposal is relevant to our Information Rights Strategic Plan and the other points set out in paragraph five: Research themes for 2017/18 applications  
There are no potential conflicts with our work and values.
- Feasibility – the proposal is accurate, has sound methodology and realistic budgets and timelines.
- Value for money – the proposal offers an effective, economical and high quality solution. This would also include the ability of project to link with other independent sources of public funding e.g. match funding.
- Outcomes and benefits – the proposal sets out clear expectations for a positive impact on UK data protection rights and obligations.  
There is clear evidence of a plan to share research results to enable uptake by relevant end-users.  
Short and long term outcomes are explained.

You should demonstrate how you meet each of these criteria in your application and summary proposal.

You must also include:

- detailed methodology;
- project deliverables and outcomes; and
- key milestones and timescales.

We also require details of any individuals or groups you intend to interview or survey and set out how you will do this.

## 15. Key dates

Applications should be submitted by email to [icograntsprogramme@ico.org.uk](mailto:icograntsprogramme@ico.org.uk).

The deadline for receipt of applications is 5pm Friday 28 July 2017. Please ensure you attach all additional documents to your application form. Applications received after this time and incomplete applications will not be considered.

The first review will take place within eight weeks of the application deadline and the second review will take place within the following four weeks.

The outcome of applications will be communicated to all applicants within four weeks of the second review.

## 16. Payment of funds

Funds available are limited to the amount set out in your application. Any additional funding will not be provided without our prior written authorisation and will be subject to the Grants Programme budget limitations. The total funding provided to each project will generally be no more than £100,000. More funding may be available for exceptional proposals subject to budgetary demands.

Payments will be made in respect of expenses and costs incurred directly as a result of your research. You will need to submit an expenses report attaching all relevant receipts on a quarterly basis, at least.

Payment of funds will be made by BACS following receipt of the signed Grant Agreement into the lead applicant's bank account. We reserve the right to carry out checks on the information you have provided, which may include credit checks, prior to transferring any funds to successful applicants.

We will pay up to 75% of the total grant at the start of the project. The remaining 25% will be paid on submission of a satisfactory final report and final expenses report. Left-over funds must be returned to us and we will retain any remaining funds that we have not already paid to you.

We reserve the right to withdraw funding and recover any funds already paid to you if you make any false representations in relation to your application or project.

## 17. Acknowledgement of ICO funding

You will be required to acknowledge the support of the ICO in supporting your project. You must acknowledge our support in all publications and media communications including press releases, presentations and training courses. The Commissioner (or an employee of the ICO) will be given the opportunity to take part in public announcements related to the research project.

## 18. Evaluation

Successful applicants are expected to take part in any evaluation exercise carried out by the ICO to assess the impact and value of the Grants Programme.

You must be willing and able to take part in events organised by us to promote the Grants Programme and the outcomes of your project. Examples of participation include presenting research outcomes at our conferences and speaking events, writing articles for our newsletters and other promotional activities.

## 19. Assistance with your application

If you require any assistance in completing your application, please contact us at [icograntsprogramme@ico.org.uk](mailto:icograntsprogramme@ico.org.uk) and we will be pleased to assist with any queries around the application process. We will provide written feedback on your application if unsuccessful at any stage.

Let us know if you require any reasonable adjustments to support your application.

## 20. Complaints procedure

If you are unhappy about the way we have handled your application, we ask you contact us in the first instance to discuss your concerns. If we are unable to resolve the situation, you may make a formal complaint to us. Please refer to the [complain about us](#) section of our website.

Please note we are unable to accept appeals against our decision on your application.