

# Grants Programme Applicant's Guide 2018/2019

**ico.**

Information Commissioner's Office

## Introduction by Elizabeth Denham

I am delighted to introduce the guide to applicants for the second round of funding from the ICO grants programme. I am confident applicants will find it useful as they set out to put together a compelling application for funding support.

Information Rights are evolving all the time and it is fair to say that a lot has happened since we launched the inaugural grants programme a year ago.

The introduction of the GDPR and the new Data Protection Act 2018, along with high-profile cases and incidents, have meant that privacy issues and concerns about how people's personal information is used have probably never been more prominent, both in the UK and overseas.

We believe that our grants programme reflects this by giving the UK's excellent research community an increasingly strong voice in the evolution of Information Rights. It is only right that we should turn to researchers to provide practical solutions to real problems. The UN's Rapporteur on the Right to Privacy saw the merit of such an approach to information rights problems when he recently visited the UK and heard about the ICO's grants programme.

The four projects we supported in the inaugural funding programme are progressing well and we were delighted to welcome the teams behind them to our annual Data Protection Practitioners' Conference in Manchester in April, where they gave presentations on their research.

We have some new themes and areas of focus for this year's funding round. This guide should be read alongside the ICO's Information Rights Strategic Plan, which sets out our longer term overarching priorities and provides helpful signposting for your research goals.

As always, the objective of promoting and increasing the public's trust and confidence in how their data is used is at the very heart of our strategy. Research continues to show that the majority of the public don't trust the way that their personal data is used. I want to see that level of trust increased significantly. That requires evidence of what is causing the problem of lack of trust and well-considered ideas for how to address it.

I hope this guide will help inform 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**

A handwritten signature in black ink, appearing to be 'ED', written in a cursive style.

Information Commissioner

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## **1. About this Guide**

This guide is intended to provide applicants with detail 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 sign once a proposal is approved. Our Head of International and Intelligence will oversee the Grants Programme.

## **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 is £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 be available?**

July 2018.

The Programme was launched for the first time in 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. Objectives**

The objectives of the Grants Programme are to:

- 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, interactions with new technologies and promote better public awareness.
- Promote uptake and application of research results by relevant stakeholders, including policy makers.
- Develop existing privacy research capacity in academic and not-for-profit sectors.

## **5. Research Themes 2018/2019**

We have set 5 strategic goals in our Information Rights Strategic Plan:

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.

The ICO is inviting applications for projects that meet one or more of the strategic goals set out in our Information Rights Strategic Plan. In particular, we are seeking proposals that align with goals 1, 2 and 4.

Therefore, this year we are seeking privacy by design or accountability solutions which focus on key privacy challenges or the privacy implications of new technologies. Examples of areas we are interested in include:

- Artificial intelligence, big data and machine learning.
- Biometric and facial recognition and data safeguards in public and private sector.
- Children's' data, age verification and parental consent verification solutions.
- Data trusts and the safe sharing of personal information.
- Good practice, compliance and self-assessment for SMEs.

We are also interested in projects that address the privacy challenges related to Blockchain, the internet and cross device tracking. Examples of other challenges are contained in the Plans or in recent guidance of policy documents on the ICO website.

Proposals do not need to be technology based. However, proposals 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](https://www.gov.uk/grants-standards).

## **7. Eligibility**

In order to tap into the broadest range of expertise in this area, we have decided to open the scheme to both UK and international organisations. All proposals must meet the objectives set out above, 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.

The minimum award will be £20,000 and the maximum award will be £100,000.

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/individual subject to insolvency/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 conclude 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);
- 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; and
- Expenses incurred prior to or after completion of the funding period set out in the Grant Agreement.

You must provide detailed information about the costs that you require funding 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 regime, 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 3 months of the end of your research project.

## **11. Data Protection**

All applicants must comply with the Data Protection Act 2018 and the EU General Data Protection Regulation 2016/679. Detailed guidance on what this will mean for you 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 to enable us to fulfil these obligations. Full details of how we will use your information can be found on our website regarding 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 adult cohorts 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 s.15.

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

You will be required to submit a summary of your proposal with your application form. The summary should be 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 will commence as follows:

- 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 of Applications**

Assessment of applications will be made against the following criteria:

- 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 there are no potential conflicts with our remit and values.
- Feasibility – the proposal is accurate, with a sound methodology and has 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 disseminate 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 include:

- Detailed methodology.
- Project deliverables and outcomes

- Key milestones and timescales

We also require details of any cohorts/stakeholders that 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 17 August 2018**. 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 8 weeks of the application deadline** and the second review will take place **within the following 4 weeks**.

The outcome of applications will be communicated to all applicants **within 4 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. On occasion, however 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 at least a quarterly basis.

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 commencement of the project. The remaining 25% will be paid on submission of a satisfactory final report and final expenses report. Surplus 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 facilitating 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 participate in public announcements related to the research project.

## **18. Evaluation**

Successful applicants are expected to participate 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 participate 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.

Please also let us know if you require any reasonable adjustments to facilitate your application.

## **20. Complaints Procedure**

If you are unhappy about the way we have handled your application, we ask that 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.