

INNOVATE UK INFORMATION MANAGEMENT POLICY

Background

Changes in legislation, government policy, and the way Innovate UK (“us”, “we”, “our”) engages with its programmes, customers and stakeholders requires the update to some of its contracts, policies and procedures to ensure good information management.

This Information Management Policy (“the **Policy**”) provides a simple, effective method of information management that works across all areas of the organisation and allows us to maximise the utilisation of the information we obtain. This will enhance our ability to fund, support and connect innovative businesses to accelerate sustainable economic growth for the UK.

Accordingly, any information obtained by us, whether it is through our online platforms, our grant applications and administration, through events or elsewhere, will be managed pursuant to this Policy.

Definitions

The following definitions apply in this Policy:

Affinity Partner Activities:	<p>means one or more of the following activities conducted by an Affinity Partner (either itself or through use of a sub-contractor/consultant):</p> <ul style="list-style-type: none"> i) grant administration, evaluation and reporting; ii) research into the impact and effectiveness of grants and its administration; iii) undertaking its own administration, reporting and compliance; and iv) keeping people and organisations informed of activities, assistance and opportunities of potential interest to you. <p>In the case of UK Administration, this also includes:</p> <ul style="list-style-type: none"> v) sub-contracting to its own core funded delivery partner for one or more of the above activities. <p>Except that personal data is excluded from this Use Category insofar as marketing activities are concerned where the data subject has opted-out. Instead, non-personal organisation contact information shall be provided and used instead.</p>
Affinity Partners:	means one or more Delivery Partners, Public-Funded Partners, Research Councils, and/or UK Administration.
Agreed Activities:	means activities specified by us and agreed by you as part of an engagement.
Agreed Information:	means particular Information specified by us and agreed by you.
Agreed Third Parties:	means third parties specified by us and agreed by you as an integral part of an engagement.
Delivery Partner:	<p>means an organisation that receives core funding directly from us to undertake a programme of agreed activities for the benefit of UK industry, as applicable from time to time.</p> <p>A list of the current Delivery Partners can be found at https://interact.innovateuk.org/terms-and-conditions</p>
Information Provider:	means any third party that provides Innovate UK with Information.
Information:	<p>means all information collected by Innovate UK from a third party by any means, whether it is public information, confidential information, classed as personal data, or is otherwise restricted in some manner.</p> <p>Information excludes aggregated data which uses Information to produce a result, but only insofar as such results do not disclose the Information from which it is derived.</p>
Internal Activity:	means all internal activities of Innovate UK (whether conducted itself or through use of a sub-contractor/consultant) and includes:

	<ul style="list-style-type: none"> i) grant administration, evaluation and reporting; ii) research into the impact and effectiveness of grants and its administration; iii) Innovate UK's own administration, reporting and compliance; and iv) keeping people and organisations informed of activities, assistance and opportunities of potential interest to you.
Public-Funded Partner:	means an organisation that receives core funding directly from another UK public funding body to undertake a programme of agreed activities for the benefit of UK industry, as applicable from time to time.
Research Councils:	<p>means a research council as defined under the Science and Technology Act 1965 and established by Royal Charter, as applicable from time to time.</p> <p>A list of the current Research Councils can be found at https://interact.innovateuk.org/terms-and-conditions</p>
UK Administration:	<p>means a Crown body or an advisory or executive Non-Departmental Public Body ("NDPB"), as applicable from time to time.</p> <p>A list of the current Crown bodies and NDPB we share Information with can be found at https://interact.innovateuk.org/terms-and-conditions</p>

Policy Principles

Instead of creating a number of prescriptive policies with detailed rules applicable to each area of Innovate UK, this Policy is principle based, using a three-stage '**engagement journey**' for all areas of work. Information obtained is separated into four '**use categories**' to simply explain our responsibilities and treatment of that information.

Engagement Journey

There are three stages of any engagement by Innovate UK with an Information Provider ("**you**", "**your**"), in ascending order of commitment:

1) Dialogue

- This concerns communication of information not under Stages 2 or 3 below; generally this is open or informal engagement without pre-defined rules or contracts.
 - For example, an ad hoc telephone call (not covered under a more formal relationship below).

2) Engagement

- This concerns communication of information under 'implied' terms in relation to which Innovate UK has specified how it will treat information.
 - For example, a grant application, where there is no signed contract in place, but pursuant to which we receive significant amounts of your Information.

3) Contractual

- This concerns any communication of information under a signed set of terms and conditions.
 - For example, Information received under a grant funding agreement.

Your Journey - You can skip stages on your engagement journey, stop at any stage, and run multiple journeys simultaneously via different work programmes with different 'packages' of information.

Where you move along the stages of your engagement journey, Information that you provide to us will, unless stated otherwise, be held in accordance with the terms and conditions of the highest level you reach with us along that particular journey.

- For example, if you sign a grant funding agreement with us, Information that you provided as part of the grant application process will also be held and used in accordance with the terms of the agreed grant.

Use Categories

Four use categories have been identified for the different types of Information Innovate UK receives:

1. Private
2. Private, with Agreed Exceptions
3. Restricted
4. Public

The use and disclosure of Information within each use category is set out below:

<u>PRIVATE</u>	
1	
Use of Information	Disclosure
We may use the Information for: i) Internal Activities.	Information will be kept confidential and not disclosed to third parties unless, and only insofar as is reasonably necessary: i) to undertake an Internal Activity; or ii) as required by law.
PRIVATE, WITH AGREED EXCEPTIONS	
2	
Use of Information	Disclosure
We may use the Information for: i) Internal Activities. The Agreed Third Parties may use the Information for: i) Agreed Activities. Note: The Agreed Activities will be made explicit in the terms of our engagement with you. For example, in the grant application rules, or in the grant funding agreement.	Information will be kept confidential and not disclosed to third parties unless, and only insofar as is reasonably necessary: i) to Agreed Third Parties and only with Agreed Information; ii) to undertake an Internal Activity; or iii) as required by law. Note: The Agreed Information and Agreed Third Parties will be made explicit in the terms of our engagement with you. For example, in the grant application rules, or in the grant funding agreement.
RESTRICTED	
3	
Use of Information	Disclosure
We may use the Information for: i) Internal Activities; The Affinity Partners may use the Information for: i) Affinity Partner Activities.	Information will be kept confidential and not disclosed to third parties unless, and only insofar as is reasonably necessary: i) to our Affinity Partners; ii) to undertake an Internal Activity; or iii) as required by law.
PUBLIC	
Use of Information	Disclosure
Information may be used without restriction.	Information may be disclosed without restriction.

Information Laws

- We hold all information in compliance with the Data Protection Act 1998, subject to the Freedom of Information Act 2000, and in accordance with any additional guidance or policies issued at the time of receipt of your information.
- Where we share personal data with Affinity Partners, such Affinity Partners shall become the data controllers of that personal data and must act in accordance with the terms of this Policy and the Data Protection Act, and shall become directly responsible to you (and the Information Commissioner) thereunder.
- It is specifically noted that some Affinity Partners use third party applications and services which process personal data outside the European Economic Area. Where this occurs, the Affinity Partner shall ensure that it complies with its responsibilities to keep your personal data safe and secure.

Work Programmes

Five principal work programmes have been identified, pursuant to which all our interactions with you will fall. These work programmes are listed below with examples.

1) Online

- a) Innovate UK controlled websites/platforms e.g.
 - i) Corporate website
 - ii) _Connect
- b) Third Party controlled websites/platforms e.g.
 - i) Social Media;
 - ii) CommuniGator;
 - iii) JE-S;
 - iv) other

NOTE: *The relevant terms and conditions of the third party website/platform apply to your Information. Insofar as Innovate UK has any discretion as to how Information from a particular website/platform is used and distributed, the terms of this Policy shall apply.*

2) Grants;

- a) Competitions / Grant applications / administration & monitoring of Grants.

3) Events;

- a) Open Networking Events / general engagement
- b) Closed Networking Events

4) Affinity Partners

- a) Board / Committee Attendance
- b) Formal programme engagement
- c) General discussions

5) Administrative (legal, reporting, other support & administrative functions).

- a) General telephone/email correspondence

Engagement Journeys

For each work programme, there will be a number of 'engagement journeys', during which Innovate UK will receive, use and transmit Information. A non-exhaustive list of these are summarised below to capture the principal engagement journeys and resulting Information.

1) Online

User Journey 1a(i): Corporate Website Visitor				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
		[N/A]		[N/A]
Visitor visits website	→	[N/A]	→	[N/A]
Information Transmitted <ul style="list-style-type: none"> anonymous user data analytics 		Information Transmitted <ul style="list-style-type: none"> N/A 		Information Transmitted <ul style="list-style-type: none"> N/A

User Journey 1b(ii): Connect User				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
		Visitor signs up to _Connect T&Cs		Visitor signs up to _Connect T&Cs
Visitor visits _Connect	→	[Skip to next Stage]	→	Visitor is a Member of _Connect
Information Transmitted <ul style="list-style-type: none"> anonymous user data analytics 		Information Transmitted <ul style="list-style-type: none"> N/A 		Information Transmitted <ul style="list-style-type: none"> Name email address telephone number address employer contact preferences generic contact details for organisation

2) Grants

User Journey 2: Grant Applications				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
		Submission of Grant application		Grant Contract Executed
Initial enquiries regarding Grant applications	→	Grant application & assessment	→	Grant award and monitoring
Information Transmitted <ul style="list-style-type: none"> High level business information 		Information Transmitted <ul style="list-style-type: none"> Financial Information relating to the business Intellectual Property re proposal Confidential 'Business' Information Organisation Name Contact Information for main office Contact information for principal/named employees Project Summary Grant Amount Success/Non-Success Appraisal of application High level business information relevant to applications 		Information Transmitted <ul style="list-style-type: none"> Financial Information re the business Financial information re project expenditure Intellectual Property arising from Project Confidential 'Business' Information Organisation Name Contact Information Project Summary/Description Grant Amount Project Data Contact details of employees Contact details of named/principal employees Bank/payment details

3) Events

User Journey 3a: Open Networking				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
Acceptance sent by attendee to event			[N/A]	
Invitation to open events	→	Attendance at open events	→	[N/A]
Information Transmitted <ul style="list-style-type: none"> Name of Organisation Contact details for main contact High level business information 		Information Transmitted <ul style="list-style-type: none"> Name of Organisation Contact details for main contact Contact details for attendees/third parties High level business information Payment Details 		Information Transmitted <ul style="list-style-type: none"> N/A

User Journey 3b: Closed Networking				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
Acceptance sent by attendee to event			[N/A]	
Invitation to closed events	→	Attendance at open events	→	[N/A]
Information Transmitted <ul style="list-style-type: none"> Name of Organisation Contact details for main contact High level business information 		Information Transmitted <ul style="list-style-type: none"> Name of Organisation Contact details for main contact Contact details for attendees/third parties High level business information Payment Details Attendance at Closed Event 		Information Transmitted <ul style="list-style-type: none"> N/A

4) Affinity Partners

User Journey 4a: Affinity Partner Board/Committee Attendance				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
Attendance			Formal Appointment	
Initial discussions with Affinity Partners re board/committee	→	Attendance on group / committee with no contractual commitments	→	Innovate UK Rep on Board / Committee with defined terms of reference
Information Transmitted <ul style="list-style-type: none"> Contact details for main contact High level business information 		Information Transmitted <ul style="list-style-type: none"> Name of Organisation Contact details for main contact Contact details for attendees / third parties Promotional information High level business information Detailed business information Committee/group information packs Confidential business information Financial Information IP Information 		Information Transmitted <ul style="list-style-type: none"> Innovate UK Rep may receive documents in capacity of director which is not Innovate UK info. Non-directors will receive information on behalf of Innovate UK. Board /Committee packs Confidential business information Financial Information IP Information Promotional information

User Journey 4b: Affinity Partner Programme Engagement				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
More detailed, routine or significant engagement			Contractual commitment specifying obligations	

Initial Discussions	→	General information sharing / general assistance	→	Contractual programme for delivery
Information Transmitted		Information Transmitted		Information Transmitted
<ul style="list-style-type: none"> Contact details for main contact High level business information 		<ul style="list-style-type: none"> Contact details for main contact Contact details for third parties High level business information 		<ul style="list-style-type: none"> Confidential business information Other information permitted to be shared to perform the programme

5) Administration

User Journey 5: Telephone Calls / Emails / Letters				
DIALOGUE	→	ENGAGEMENT	→	CONTRACTUAL
		Formal discussions / correspondence		Executed Contracts / Framework
Initial ad hoc contact	→	Formal correspondence and discussions in a 'regulated' manner – published guidance e.g. DPA/FOI request	→	Correspondence required by contracts and/or framework
Information Transmitted		Information Transmitted		Information Transmitted
<ul style="list-style-type: none"> Caller/Writer's name Caller's contact number, email and postal address High level business information 		<ul style="list-style-type: none"> Caller/Writer's name Caller's contact number, email and postal address Request for information 		<ul style="list-style-type: none"> Discussion re request for information under Grant FOI clause and formal response

INFORMATION USE SUMMARY

	DIALOGUE	ENGAGEMENT	CONTRACT
PUBLIC INFORMATION	<ul style="list-style-type: none"> Anonymous website traffic data Organisation name attending open events 	<ul style="list-style-type: none"> Information for public release/PR 	<ul style="list-style-type: none"> Organisation Name (grant recipient) Contact Information of main office Project Summary/Description Grant Amount Information for public release/PR
RESTRICTED INFORMATION <i>*Personal Data is excluded from this Use Category insofar as marketing activities are concerned where the Data Subject has opted-out. Instead, generic organisation contact information shall be provided and used instead.</i>	<ul style="list-style-type: none"> Business cards / contact information High level business information from discussions 	<ul style="list-style-type: none"> Organisation Name Contact Information of main office Contact information of main employee (to facilitate engagement) Contact details of attendees to events Contact Details for third parties Top level information from board/committees that help facilitate interactions/furthering objectives and which is not 'sensitive' in a general sense 	<ul style="list-style-type: none"> Name (of _Connect Member) email address (of _Connect Member) telephone number (of _Connect Member) address (of _Connect Member) employer (of _Connect Member) contact preferences (of _Connect Member) Contact Information for named/principal employees of grant recipient Top level summary of Grant activities to facilitate engagement Top level information from board/committees that help facilitate interactions/furthering objectives and which is not 'sensitive' in a general sense
PRIVATE INFORMATION WITH AGREED EXCEPTIONS	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> As clearly and specifically agreed with information owner/engaging party, limiting who will receive the information, what information will be shared, and the permitted use/purpose of that shared information. 	<ul style="list-style-type: none"> As clearly and specifically agreed with information owner/contracting party, limiting who will receive the information, what information will be shared, and the permitted use/purpose of that shared information.
PRIVATE INFORMATION	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Financial Information relating to the grant applicant Intellectual Property re grant application Confidential 'Business' Information within grant application Grant application Project summary Grant Application amount Success/Non-Success of Grant application Appraisal of Grant application Payment details Intellectual Property belonging to Affinity Partner or its collaborators Attendance at Closed Event 	<ul style="list-style-type: none"> Financial Information re the grant recipient Financial information re project expenditure Intellectual Property arising from R&D Intellectual Property belonging to Affinity Partner or its collaborators Confidential 'Business' Information Contact Information for other employees Project Data Personal details of employees Bank/payment details