

Reference: 02182268

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

4 June 2026

## Freedom of Information request: Right to know request

Thank you for your request for information about the Guardian Foundation contract.

We received this request on 7 April 2026 and we have considered your request under the Freedom of Information Act 2000 ("the FOI Act").

### Your request & our response

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*Under the Freedom of Information Act 2000, I am requesting certain recorded information held by Ofcom regarding the grant funding (approx. £50,000) awarded to The Guardian Foundation for the project titled "Untold Stories" (or similar media literacy initiatives) for the financial years 2024/25 and 2025/26.*

By way of context, Ofcom has not granted funding or donated money to the Guardian Foundation.

The Guardian Foundation – which is separate to the Guardian's news operation – was awarded a contract to deliver work through a robust, and competitive tender process.

We procured their services for our Untold Stories programme, which supports the delivery of our statutory duties to improve media literacy. We commission a wide range of community and grass roots organisations through our Making Sense of Media programme. Untold Stories is one of these projects.

*To ensure this request captures the full decision-making lifecycle, please provide the following:*

#### 1. Procurement and Award Process:

- *Evidence of the competitive tender process used for this award, including the date of the "Invitation to Tender" (ITT), where it was advertised, and the number of competing bids received.*

Invitation to Tender(ITT) reference: C20242245

A competitive below threshold ITT was undertaken and advertised in Contracts Finder: [Untold Stories children and young people - Contracts Finder](#)

In addition, the opportunity was announced at Ofcom's Media Literacy Conference (MSOM) on 27 November 2024 and through email communications to the Making Sense of Media network, which at that time was comprised of 536 individuals.

16 tender proposals were received and evaluated in line with the evaluation criteria included within the ITT document.

- *If this was a Direct Award (non-competitive), please provide the Written Justification or "Direct Award Recommendation" that explains why a competitive process was bypassed.*

N/A

## *2. The Business Case and Appraisal:*

- *The Internal Business Case or "Case for Funding" that approved this project.*

The allocation of this contract falls under the budget allocated to our media literacy duties and targets under the 2024/2025 financial plan. These targets can be seen in the [24/25 Annual Report](#) on pages 58 and 59. An update on this will be published in our Annual Report later this year.

The Online Safety Act bolstered our media literacy duties, including by adding a requirement for Ofcom to take steps to improve users' ability to assess the reliability, accuracy and authenticity of content, and ultimately to understand and reduce their exposure to the phenomena of disinformation and misinformation. In practice, this involves enabling users of online services to critically assess the content they encounter online.

Ofcom's 3-year media literacy programme sets out how we will meet that duty by commissioning targeted interventions, including in relation to mis and disinformation, in the cohorts where the need is greatest, and in sharing best practice with organisations delivering media literacy activities and their funders.

- *The Evaluation Matrix or Scoring Sheets (redacted for personal data as necessary) used to assess The Guardian Foundation's proposal against any other applicants.*

Please refer to the tender document available as an attachment to this response.

- *Any Options Appraisal that considered alternative providers, such as the National Literacy Trust, the News Academy, or the Telegraph Media Literacy Programme.*

This was a competitive tender process. Ofcom considered all tender submissions from those organisations who submitted an invitation to tender proposal document via Ofcom's Jaggaer eTendering portal prior to the submission deadline. This opportunity was listed in Contracts Finder and was open for all organisations to participate including Small Medium Enterprises (SMEs) and Voluntary, Community, and Social Enterprises (VCSEs).

## *3. Governance and Neutrality:*

- *The Conflict of Interest process completed by Ofcom staff or panel members involved in the approval of this grant (together with any such declarations of conflict)*

Ofcom's standard approach to procurement was followed which included each individual panel member assessing the tenders completing a declaration of interest. There were no declared interests.

- *The Equality Impact Assessment (EIA) or Impartiality Assessment conducted to ensure that funding a branded news foundation complied with Ofcom's statutory duty of neutrality and its code of conduct regarding political impartiality.*

As explained above, the contract was awarded to Guardian Foundation, not to the Guardian's news operation, after a robust and competitive process.

Ofcom's procurement processes are designed with consideration of relevant legal frameworks in mind including the Procurement Act 2023 and the equality legislations (specifically the Equality Act 2010 and Northern Ireland Act 1998).

#### 4. The Grant Agreement and KPIs:

- *A copy of the Grant Funding Agreement (GFA) or Contract.*

Please find attached a copy of the contract with the Guardian Foundation.

Please note we have redacted some information and haven't provided annex D (contractors proposal) to the contract as we consider this information exempt from disclosure under section 43(2) of the FOI Act. This exemption deals with information that, if disclosed, would, or would be likely to, prejudice the commercial interests of a person or company. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. Annex A attached to this letter sets out the exemption in full, as well as the factors Ofcom considered when deciding where the public interest lay.

Additionally, we consider section 40(2) of the FOI Act also applies to some of the information that is personal data (i.e. the names, contact numbers and email addresses). Section 40(2) provides that personal information about persons other than the requester is exempt where, among other things, its disclosure would contravene any of the data protection principles in the UK General Data Protection Regulation and the Data Protection Act 2018. This includes the principle that personal data must be processed fairly and lawfully. Section 40(2) is an absolute exemption under the Act and does not require a public interest test.

You can also refer to the contract award notice: [Untold Stories - Children and Young People - Contracts Finder](#), which may be of use to you.

- *The specific Key Performance Indicators (KPIs) or "Schedule of Deliverables" the Foundation must meet.*

Please refer to the attached contract, as above.

- *Any clauses within the agreement regarding the use of Guardian-branded materials or the involvement of Guardian editorial staff or premises in the delivery of the project to school children.*

N/A

#### 5. Financial History:

- *A list of all other media literacy grants awarded by Ofcom to foundations or charities directly affiliated with national newspapers (e.g., News UK, DMG Media, Telegraph Media Group) during the same period to allow for a comparison of parity.*

Ofcom does not give grants, as explained above. However, we do commission a range of organisations to deliver projects that fulfil our statutory duties, which are subject to Ofcom's procurement process.

Yours sincerely,

## Information Requests

### **Request an internal review**

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

### **Taking it further**

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).

<p><b>Section 43(2) of the FOI Act provides that:</b></p> <p><b>“Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it)”.</b></p>	
Factors for disclosure	Factors for withholding
<ul style="list-style-type: none"> <li>• Disclosure would enable the public to gain a better understanding of the commercial relationships between Ofcom and third parties and the nature of the services provided, and thereby increasing public confidence in Ofcom’s work.</li> </ul>	<ul style="list-style-type: none"> <li>• Ofcom continues to negotiate contracts like those related to this request. To release the specific information requested would likely put Ofcom in a detrimental position for future fee negotiations by undermining its bargaining position with potential third party service providers.</li> <li>• In addition, the release of the detailed amount Ofcom paid would likely prejudice the commercial interests of the Guardian Foundation – in that it would provide details of negotiated fees to its competitors or potential clients.</li> <li>• Ofcom contracts with a variety of companies in order to support its operations and duties and has ongoing financial relationships with many of them. Companies need to be confident that information relating to their business, such as proposals they give us and information relating to the charges for services, will not be disclosed if it would, or would be likely to, prejudice their commercial interests. Releasing companies’ commercially sensitive information might prejudice their position in their relative markets going forward.</li> </ul>
<p><b>Reasons why public interest favours withholding information</b></p>	
<ul style="list-style-type: none"> <li>• We consider that, on balance, the potential prejudice to commercial interests outweighs the public interest in disclosure of Ofcom’s contract for services with the Guardian Foundation.</li> <li>• We consider that, on balance, the public interest in withholding disclosure of the requested information outweighs the public interest in disclosing the information.</li> <li>• Ofcom enjoys a positive relationship with those organisations it contracts with. The release of information which would, or would be likely to, prejudice commercial interests into the public domain would impair both Ofcom’s relationship with providers of services, and adversely affect its commercial relationships with them. Similarly, Ofcom’s bargaining</li> </ul>	

position, and therefore ability to obtain value for money in services it contracts for, may be undermined in future negotiations if details about the cost of these services were disclosed.

- Weighing the issues presented, it is considered that on balance, the factors for withholding the requested information outweigh those for disclosing the information.