



University of East Anglia

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Dear 

Freedom of Information Act 2000 – Information request (ref: FOI_18-024)

We have now considered your request of 26 January 2018 for information relating to UEA’s use of various social media platforms.

Our response is on pages 4-5 of this letter, together with a copy of your request.

On this occasion it is not possible to provide all the requested information. In line with your rights under section 1(1)(a) of the Act to be informed whether information is held, we confirm that the University does not hold information on our marketing expenditure with the cited social media platforms prior to 2015/16. We no longer hold the detailed budget information for older campaigns which allow us to identify and extract expenditure with these platforms from other campaign elements.

Additionally, the Act contains a number of exemptions that allow public authorities to withhold certain information from release. We have applied the following exemption to part of your request.

Exemption	Reason
s.43(2), Prejudice to commercial interests	Disclosure of information would, or would be likely, to prejudice the commercial interests of a person as defined by the Act

Exemption explanation

We have applied this exemption to elements within questions 2, 4 and 6 of your request; specifically the request for annual expenditure with each platform since 2006. It is our belief that release of this information would prejudice the commercial interests of the University.

To compete in the Higher Education market, with leading UK and international universities, UEA must ensure that information that would be strategically useful to its competitors is not placed in the public domain. Release of the amount spent with various web-based services would potentially compromise UEA’s ability to attract high quality students that allow it to be a progressive and sustainable institution. UEA’s position would be severely compromised if it were to release information which would benefit its competitors.

The Information Commissioner's Office has established a multi-criteria test for assessing whether a section 43(2) exemption applies¹ and we address each criterion in turn.

Student recruitment is undoubtedly a commercial activity for all universities. The University's success in recruiting students, and the manner in which we do so, directly affects both our reputation and financial position. It follows that information about how UEA markets itself to potential students can readily be seen as commercially sensitive.

The UK Higher Education sector is a highly competitive environment. Recent regulatory changes, such as the lifting of the cap on university places in England, have increased competition between institutions. Universities all seek to recruit the best students from a limited pool of prospective UK and international applicants, as well as competing to attract high quality staff, research funding and accreditation.

With regard to the requested marketing information, UEA, in common with other universities, undertakes various advertising activities with the aim of promoting the institution to our target markets, at home and overseas. This is a vital activity that directly affects our ability to compete within the sector.

Expenditure on specific marketing activities is regarded as a key indicator of our marketing strategy. The manner in which we direct funding to create a comprehensive and engaging marketing strategy and organise our marketing activities provides us with a possible advantage compared to those competitors who undertake this activity less effectively. We do not share any details of our tactical marketing activities or funding with competitors, particularly in key areas of marketing interest such as social media and the internet more generally.

There is a linkage between marketing expenditure and our ability to attract the number and quality of students we desire. Awareness of an institution's course offering, academic reputation, and local setting is key to any prospective student's decision to attend and the marketing available to any such student is critical to shaping such awareness. In a very crowded and competitive commercial environment, should the amount of such exposure be reduced or supplanted by another institution, our ability to recruit quality students is thus impaired.

Specifically in relation to the marketing / advertising expenditure on Google, Twitter, and Facebook, the very nature in which the purchase of advertising 'space' on such platforms operates makes such information commercially sensitive. The more an institution spends, the more prominent and visible its advertising will appear on the platform. Therefore, if an institution knows the expenditure of its competitors, it has an immediate and significant advantage in setting and targeting its own expenditure. Our Marketing division is aware that this practice does occur within the sector and is employed by our competitors for students. Finally, the prominence and importance of the sites/platforms requested renders any marketing conducted on them particularly commercially sensitive.

We do note that the data requested covers an extended period of time and whilst no doubt more dated material in and of itself has less commercial consequences for UEA, the trend over time is valuable information to competitors and can be used to extrapolate current expenditure and trends.

We would also consider it quite likely for such prejudice to our interests to occur given the sensitivity of the requested information, the consistent treatment of it as commercially sensitive by not only UEA but other Higher Education institutions, and the degree to which the recruitment of the number and value of applicants is now critical to any university's success.

¹https://ico.org.uk/media/for-organisations/documents/1178/awareness_guidance_5_v3_07_03_08.pdf

Our Marketing unit would certainly use such information from our competitors and, as noted above, given the competitive nature of bidding for marketing space on the platforms cited, expenditure figures would be very likely to be used. We already have reason to believe that other institutions monitor our marketing activities and attempt to match or exceed them and it seems inconceivable that they would not use additional information in the same manner.

Public Interest test

The application of this exemption requires an examination of the public interest in disclosure as opposed to that in non-disclosure. There is no doubt that there is a legitimate public interest in knowing the amount and way in which public funds are spent in this respect, both to further the transparency and accountability of public authority activities.

We would counter that there is also a public interest in protecting the ability of institutions to compete on a level playing field and to ensure that there is fair competition between universities for prospective students. By protecting the University's marketing information from public disclosure we are acting in line with established practices across the sector and maintaining this fair competition. Additionally, to disclose the requested information would prejudice this institution's competitive and commercial position, and it is difficult to see how this could be in the public interest.

On balance, we therefore believe the public interest lies in withholding the requested information.

We hope this response will meet your requirements, however if you are not satisfied you have the right of appeal. If you wish to appeal, please set out in writing your reasons for appealing and send to the above address. You must appeal within 60 calendar days of the date of this letter. Any appeal received after that date will not be considered nor acknowledged. This policy has been reviewed and approved by the Information Commissioner's Office.

You also have a subsequent right of appeal to the Information Commissioner's Office. Further information is available on their website:
https://ico.org.uk/Global/contact_us, or by telephone on 0303 123 1113.

Please note that any material over which UEA has copyright is released on the understanding that you will comply with all relevant copyright rules regarding reproduction and/or transmission of the information provided.

Please quote our reference given at the head of this letter in all correspondence.

Yours sincerely

Dave Palmer
Information Policy and Compliance Manager
University of East Anglia

Response to Freedom of Information Act 2000 request (FOI_18-024)

Under the Freedom of Information Act I would like to request the following information:

1. *Does your organisation have a Facebook Page(s)? If yes, what is/are the url(s) and when were they set up?*

Yes. The centrally managed Facebook page representing UEA as a whole is University of East Anglia @UEAOfficial at www.facebook.com/ueaofficial. The page was set up in October 2010.

We also have the Alumni Association: University of East Anglia @ueaalumni at <https://www.facebook.com/ueaalumni/>. The page was set up in October 2010.

There are numerous other pages representing units within UEA but the above is the official page representing UEA.

2. *Does your organisation advertise or spend any money on Facebook? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2004?*

Yes, we do advertise on Facebook.

[Information not held - s.1(1)(a), Freedom of Information Act]

UEA does not hold information recording the expenditure with Facebook prior to the financial year 2015/16 for the reasons noted in the above letter.

[Information exempted pursuant to s.43(2), Freedom of Information Act]

The amount that UEA has expended with Facebook since the financial year 2015/16 is exempted from release for the reasons noted in the above letter.

3. *Does your organisation have a Twitter Account? If yes, what is/are the url(s) and when were they set up?*

Yes. The centrally managed Twitter pages representing UEA as a corporate entity are:

@uniofeastanglia – March 2009 - <https://twitter.com/uniofeastanglia>

@UEAResearch – January 2015 - <https://twitter.com/UEAResearch>

@HeyUEA – January 2015 - <https://twitter.com/HeyUEA>

@UEAStudents – August 2015 - <https://twitter.com/UEAstudents>

@UEAGrads – October 2012 - <https://twitter.com/UEAGrads>

@UEAOutreach – January 2015 - <https://twitter.com/OutreachUEA>

4. *Does your organisation advertise or spend any money on Twitter? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2006?*

Yes, we do advertise on Twitter.

[Information not held - s.1(1)(a), Freedom of Information Act]

UEA does not hold information recording the expenditure with Twitter prior to the financial year 2015/16 for the reasons noted in the above letter.

[Information exempted pursuant to s.43(2), Freedom of Information Act]

The amount that UEA has expended with Twitter since the financial year 2015/16 is exempted from release for the reasons noted in the above letter.

5. Does your organisation use Google G-Suite services (Google services) or does your organisation rely on google for any services (such as email hosting)? If yes, what are the services, when were they agreed and how much did they cost?

Yes, the following Google applications are available to relevant users within the University:

Calendar	Google Hangouts
Classroom	Google Play
Directory	Google Vault
Drive and Docs	Jamboard Service
Google Adwords	Keep
Google Chrome Sync	

Use of Googles commenced in 2013 and the above noted applications are free of charge. We have a record of a charge of \$25.00 for acquisition and use of Google Play.

6. Does your organisation advertise or spend any money on Google? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since the payments first began?

Yes, we do advertise on Google.

[Information not held - s.1(1)(a), Freedom of Information Act]

UEA does not hold information recording advertising expenditure with Google prior to the financial year 2015/16 for the reasons noted in the above letter.

[Information exempted pursuant to s.43(2), Freedom of Information Act]

The amount that UEA has expended with Google on advertising since the financial year 2015/16 is exempted from release for the reasons noted in the above letter.

7. Is there an official policy for the use of organisational Facebook or Twitter Accounts (ie how to post, what to use it for and when to delete or preserve records)? If there is a policy (or policies) please may I be provided with them?

Yes. Use of organisational Facebook or Twitter accounts is governed by the policy entitled The Code of Conduct on Social Media Use, which is available on our website here:

<http://www.uea.ac.uk/hr/employee-information/policies/social-media-conduct>