

[REDACTED]

23 August 2019

Dear [REDACTED]

Freedom of Information Act 2000 – Information request (ref: FOI_19-262)

We have now considered your request of 13 August 2019 for information relating to the University's use of paper.

As requested, our response is in the accompanying document, FOI _19-262 Appendix A.

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 the amount spent on physical marketing materials for the Student Union, in our case, the Union of UEA Students (UUEAS). The UUEAS is a separate legal entity to the University and we do not produce physical marketing material on their behalf nor hold any information on what they themselves spend on such products.

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 be likely to prejudice the commercial interests of a person as defined by the Act

Exemption explanation

We have applied this exemption to your request for the money spent in the last 12 months on

- Printed copies of the prospectus
- Other printed publications, or
- Physical marketing materials for the University

It is our belief that release of this information would prejudice the commercial interests of the University.

Undergraduate student recruitment is a commercial activity for all universities. The University's success in recruiting these students, and the manner in which we do so,

directly affects both our reputation and financial position. Information revealing the money spent by the University in this activity, and how we choose to allocate marketing spend, can be seen as commercially sensitive.

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.

The manner in which we direct funding to create a comprehensive and engaging marketing strategy, 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 with competitors, as even a figure for print expenditure for marketing purposes, would be likely to provide them with the insight to match and potentially exceed our activities.

Similarly, disclosure of information revealing expenditure in certain forms of marketing would reveal our strategy, in terms of whether we were devoting more or less resource to certain modes marketing. Again, this is not information we would choose to make publicly available and we believe the University's position would be likely to be compromised if competitor institutions were to obtain this knowledge about our activities.

The application of this exemption requires an examination of the public interest in disclosure as opposed to that in non-disclosure.

The factors in favour of disclosure would include:

- Increasing public understanding of the University's marketing activities
- Increasing public confidence in the integrity and probity of the marketing process
- There is public interest in the expenditures of UEA

Factors in favour of withholding the information are largely laid out in the explanation for the use of the exemption above but would include:

- Protecting the ability of public authorities to compete on a level playing field
- Preventing a distortion of the marketing process that would have the potential effect of raising costs to the public sector
- There are existing avenues and/or means of scrutiny by which the public interest in our expenditures can be met; namely, the annual publication of our financial statements.

After consideration of the above factors, we believe, on balance, that the public interest lies in maintaining in the exemption.

We hope this information 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 40 working days of the date of this letter. In line with section 5.3 of the Freedom of Information Code of Practice, we are not obliged to accept internal reviews after this date.

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 Compliance Manager
University of East Anglia