



University of East Anglia

Information Compliance (ITCS)

The Library
University of East Anglia
Norwich Research Park
Norwich NR4 7TJ
United Kingdom

Email: foi@uea.ac.uk
Tel: +44 (0) 1603 593523
Web: <http://www.uea.ac.uk>



17 September 2019

Dear 

Freedom of Information Act 2000 – Information request (ref: FOI_19-290)

We have now considered your request of 07 September 2019 for information relating to the amount and distribution of our advertising expenditure for clearing in 2019. For your convenience we have provided a copy of your request on page 4 of this letter.

We regret that on this occasion it is not possible to provide the requested information.

In line with section 17 of the Act, this letter acts as a Refusal Notice. The Act contains a number of exemptions that allow public authorities to withhold certain information from release. We have applied the following exemption to 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

To compete in the higher education market, with leading UK and international universities, the University must ensure that information that would be strategically useful to its competitors is not placed in the public domain. Release of such information would potentially compromise the University’s ability to attract the high quality students that allow it to be a progressive and sustainable institution.

Student recruitment is 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. Regulatory changes in recent years, 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 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 marketing activity that directly affects our ability to compete within the sector.

Expenditure on, and the response to, 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. The same applies to any metric of how successful our marketing activities have been.

The mode and nature of advertising and how we deliver each activity or campaign, including the measures of the success of any particular activity, is also a key element of our marketing strategy and activities. The mix of media or methods and expenditure on each is core to how we target potential students and is considered highly sensitive information. This extends to the success of these activities as, external agencies could well be targeted by competitors seeking the same advantages that UEA has realised.

Even to provide examples of advertisements in every available format would, in effect, reveal the blend of marketing channels we employ and would reveal information of value regarding our marketing strategy.

We do not share any details of our tactical marketing activities or funding with competitors, particularly in key areas of marketing interest, such as our primary campaigns. Any campaign is an integrated marketing effort across a range of media and platforms which constitutes a significant component of UEA's overall recruitment strategy.

There is a linkage between marketing expenditure, methodology and measurement and our ability to attract the desired number and quality of students. Awareness of an institution's course offering, academic reputation, and local setting is key to any prospective student's decision to attend. The marketing materials available to any prospective student are critical to shaping such awareness. In a very crowded and competitive commercial environment, should the amount and nature of such expenditure and the success of our efforts be revealed, other institutions will be able to adjust their marketing to match or exceed our activity and thereby impair our ability to recruit quality students.

We believe it is likely that such prejudice to our interests would occur, given the consistent treatment of the information as commercially sensitive, by not only UEA but other higher education institutions, and the degree to which the recruitment of the number and nature of applicants is now critical to any university's success.

Our marketing department would certainly use such information from our competitors. We already have reason to believe that other institutions monitor our marketing activities and attempt to match or exceed them. 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.

The factors in favour of disclosure would include:

- Increasing public understanding of the marketing activities and expenditures at UEA.
- Enhancing the transparency and openness of the marketing process
- Increasing public confidence in the integrity and probity of the marketing process at UEA

- There is public interest in the expenditure of funds by universities to market themselves

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
- Avoiding distortion of the market for admission to higher education by disadvantaging one institution

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

We are sorry we cannot provide the information you requested, but trust this letter explains our position. If you are unhappy with our response, you have the right of appeal against this decision. 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 UK Government's Freedom of Information Act 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](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

Freedom of Information Act request (ref: FOI_19-290)

'Under the Freedom of Information Act, can you please tell me how much money you spent on advertising for clearing in 2019.

Can you please provide subtotals for the following categories (feel free to break them down further if that's appropriate):

- 1. Facebook*
- 2. Instagram*
- 3. Google - that is, search advertising*
- 4. YouTube*
- 5. Snapchat*
- 6. Twitter*
- 7. Other social networks (please specify) 8. Amazon 9. Online - that is, on websites excluding social networks, or those websites those listed above (this includes advertising using Google's ad network) 10. Television 11. National newspapers 12. Local newspapers 13. Magazines 14. Posters and billboards 15. Radio 16. Public transport billboards*

Can you also provide an example of an ad in each of the above formats.

For the online forms of advertising, can you also tell me how many clicks each advertisement received. Can you also provide any other data you have which indicates the engagement with each ad.

For Google advertising, can you list which keywords you advertised against. Can you please indicate the cost-per-click in each case.

For Facebook, can you please supply

- A list of the interests and/or demographics you targeted

- If you used custom audiences, where you derived the data to make that custom audience from

Can you please provide this information in an Excel format.'