



University of East Anglia

Information Compliance (ITCS)

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14 September 2018

Dear [REDACTED]

**Freedom of Information Act 2000 – Information request (ref: FOI\_18-198)**

We have now considered your request of 16 August 2018 for the following information:

*'How much money did you spend each year from 2015 to 2018 on advertising to recruit students? This includes adverts with mention of 'clearing'.*

*Please break down your answer per advertising campaign and name each of those campaigns.*

- *Please break down the budget for each campaign – ie. How much spent on actors, on studio time etc.*
- *Per advertising campaign, please say in what medium they were transmitted through – ie. Via radio, TV, social media...*

*Who ran each campaign? ie. Was the project outsourced – if so – to who and at what cost? Was it in-house – who did it and at what cost?'*

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, or 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 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.

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. 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 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 mode of advertising and how we deliver each activity or campaign, including who we employ to undertake the 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 who we utilise to carry out these activities as, depending upon the success of any particular campaign, external agencies could well be targeted by competitors seeking the same advantages that UEA has realised.

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 and methodology 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 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. There is no doubt that there is a legitimate public interest in knowing the amount and way in which public time and effort 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. To disclose the requested information would be likely to 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](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