

[REDACTED]

24 November 2014

Dear [REDACTED]

**Freedom of Information Act 2000 – Information request (ref: FOI\_14-223)**

We have now considered your request of 27 October 2014 for information relating to international student recruitment agents. Our response is on page 3 of this letter, together with a copy of your request, and we hope this will meet your requirements.

However it is not possible to provide all the requested information. Firstly, 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 in response to your fourth and fifth questions. Further explanation is on page 3.

Secondly, 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

We have applied this exemption to the information requested in question 3. It is our belief that release of this information would be likely to prejudice the commercial interests of the University.

Disclosure of this information would, in combination with the figures provided in response to question 2, reveal the University's average spend per student on recruitment agency commission in each of the specified years. We believe this to be commercially sensitive information, in that it relates directly to University activities concerning the recruitment of students - a key commercial activity for any university.

The University must consider any disclosure of information under FOIA to be release to the world at large. The UK higher education sector is highly competitive and our competitors would be able to make use of this information to potentially undermine our relationship with recruitment agents, for example by improving on the rate of commission paid. This could result in the University recruiting fewer students via this route. Revealing the average spend may also push up the rate of commission requested by individual agents, were they to discover their rate was lower than the average spend. These outcomes would clearly be harmful to our commercial interests.

Application of this exemption requires us to consider the public interest in withholding or disclosing this information. We acknowledge there is a general public interest in transparency and accountability in terms of how the University spends money. This interest may incorporate the amount spent each year on recruitment activities and, by extension, expenditure on international student recruitment agents. We are happy to provide information on the number of students recruited through agents, as this may be a useful measure of our performance in this area.

The recruitment of international students is an important commercial activity for any UK university, and success or otherwise in this area will directly affect each institution's income. While there may be a limited public interest in the University's financial relationship with these agents that cannot be satisfied by the information provided elsewhere in our response, we do not believe it would be in the general public interest to disclose the requested information when it would be likely to prejudice the University's commercial interests. On balance, we have determined the public interest lies in protecting the commercial interests of the University.

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.

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

Yours sincerely

Ellen Paterson  
Information Policy and Compliance Manager  
University of East Anglia

**Response to Freedom of Information Act 2000 request (FOI\_14-223)**

1. *Does your university use international student recruitment agents?*

Yes.

2. *How many non-EU students were enrolled at your institution using international student recruitment agents during the following years, broken down year-by-year: 2011/12, 2012/13, 2013/14?*

2011/12 – 718

2012/13 – 1044

2013/14 – 947

3. *What was the total amount spent by your institution on international student recruitment agents during the following years, broken down year-by-year: 2011/12, 2012/13, 2013/14?*

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

4. *Do students recruited to your institution using international student recruitment agents have to pay a fee to the agent?*

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

The University does not record this information for individual students or recruitment agents. However, anecdotally we are aware that some international student recruitment agents with whom the University works will require a fee from students. Indeed in some cultures people would be dissuaded from using a service if it was offered for free and therefore a charge is expected.

5. *Do international student recruitment agents recruiting for your institution tell prospective students that a) they are paid commission; and b) the amount of commission they will receive?*

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

This information is not recorded by the University.

6. *On how many occasions during 2011/12, 2012/13, 2013/14 has your institution had to take action regarding allegations of fraud, forgery, dishonesty, or other improper behaviour by an international student recruitment agent working on your behalf? For each instance, please provide brief details of the allegation and the action taken.*

Academic year	Allegation	Action taken
2011/12	None	N/A
2012/13	Improper behaviour	Agent suspended while investigated
2013/14	None	N/A