

██████████

28 April 2015

Dear ██████████

Freedom of Information Act 2000 – Information Request (Our file: FOI_15-067)

We have now considered your request of 30 March 2015 for information regarding the organisation, functions, staffing and systems associated with our Admissions unit. Our response is provided on pages 4-5 of this letter, together with a copy of your original request. We hope this response will meet your requirements.

It is, however, not possible to satisfy all elements of your request, and in accordance with section 17 of the Freedom of Information Act 2000 this letter acts as a partial Refusal Notice, and I am not obliged to supply all of the requested information. The exemptions are clearly indicated within the attached document and the reasons for exemption are as stated below:

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

Exemption explanation

In regards the application of section 43(2), it is our belief that the release of an organisational chart of the admissions function at UEA would or would be likely to, prejudice the commercial interests of the University. We are also of the opinion that release of our target turnaround time, average turnaround time and percentage of those turned around within target when turning an application into an offer or reject would also or would be likely to, prejudice the commercial interests of the University.

The Information Commissioner's Office has established a multi-criteria test for assessing whether a section 43(2) exemption applies.¹ The first criterion is whether the information relates to, or could impact on a commercial activity. The First Tier Tribunal (Information Rights) has also conclusively stated that universities, despite their charitable status, do engage in commercial activities. The commercial activity here is the recruitment, and

¹http://www.ico.gov.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_specialist_guides/AWARENESS_GUIDANCE_5_V3_07_03_08.ashx

admission of prospective students. The successful admission of students is very much a core element of the commercial activity of the University and is critical to maintaining our ability to compete within the Higher Education sector.

The second criterion is whether the commercial activity is conducted in a competitive environment. Universities operate in a global marketplace competing for research funding, students and accreditation. The UK HE sector is highly competitive as universities are seeking to recruit from a limited pool of prospective UK and International students. The recruitment of students all relate to, and are conducted within, this competitive environment.

We will now examine the remaining criteria as they relate to the two separate types of information in question.

Organisational chart of the admissions function at UEA

Significant resources are devoted to admissions activities, and the efficiency and effectiveness with which we conduct this function is a factor in our ability to compete successfully in the national and international market for students. The manner in which our admissions function is organised provides us with an advantage compared to other institutions who undertake this activity less effectively. The speed, accuracy, and manner with which we conduct our admissions activity has been shown to have an impact on our ability to recruit, and convert into registrants, a high number of high quality candidates for admission to the University. In particular, the speed with which we deal with applicants results in a more immediate and stronger relationship with applicants, and a higher level of conversion than our competitors.

Additionally, it is known that universities do seek to know, and are interested in how other institutions organise admissions functions so they can replicate successful strategies. It is our belief that the organisation of our admissions function is commercially sensitive information. It gives UEA a competitive advantage and we would not want to release this information.

The next criterion goes to the prejudice itself; would there be damage to the University's reputation, business confidence or ability to compete? Under FOI, release to one requester can be considered as release to the world. It is our position that release of the organisation of admissions functions would reveal the competitive advantage we currently possess in this area. Our competitors could use this information to alter their own admissions organisation, negating the competitive advantage UEA possesses, and UEA would lose applicants that we are currently converting to registrants.

We also have to determine the likelihood of prejudice being caused by release of this information. We are aware of interest from other institutions in the organisation of our Admissions function and feel confident that our competitors would use such information to 'close the gap', target their activities to those that we undertake, and as a consequence, reduce our ability to compete within this market.

Target turnaround time, average turnaround time, percentage of target met

Our target turnaround time, average turnaround time and percentage of those turned around within that target is important strategic and commercially sensitive information relating to the quality of the admissions function within any institution. It also is a visible indicator of the advantage that our organisation structure possesses in comparison to our competitors. At no time would we consider voluntarily releasing this information to either our competitors or the world at large.

Particularly in the case of international students, the turnaround time both as a target and average is a factor in the degree to which agents direct students to an institution. As noted above, the efficiency and effectiveness of our admissions processes are a factor in our ability to attract and retain high quality students and this information is a particularly relevant indicator of such efficiency and effectiveness.

In regards the damage to UEA's commercial interests, were our turnaround target, average, and success rate be made public, other institutions and agents would use this information as an indicator of the performance of our admissions function to highlight differences with other institutions to our disadvantage. As with the organisation of the Admissions function, this information would reveal our competitive advantage to our rivals in the higher education market who could alter their targets accordingly and negate our advantage.

We believe that there is a strong likelihood of prejudice being caused by release of this information. We note that this information is increasingly regarded as commercially confidential within the HE sector, and that sharing of such information is in sharp decline. We are also aware that institutions actively attempt to source some of this information from other institutions. It is information that UEA itself would use and find valuable in competing to attract and convert applicants.

Public Interest Test

A public interest test² must be applied to the exemption for prejudice to commercial interests. 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 and to ensure that there is fair competition for prospective students. To disclose this information would prejudice this institution's competitive and commercial position, and it is difficult to see how this could be in the public interest. Given the importance of such activities to the recruitment of students to an institution, any distortion of the process would not be in the interests of maintaining a competitive environment.

You have the right of appeal against this decision. If you wish to appeal, please set out in writing your grounds of appeal and send to me at the address noted in the heading to this letter.

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 whose [contact details](#)³ can be found on their website.

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

Yours sincerely

David Palmer
Information Policy and Compliance Manager
University of East Anglia

²http://www.ico.org.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_specialist_guides/the_public_interest_test.ashx

³https://ico.org.uk/Global/contact_us

Response to Freedom of Information Act 2000 request (FOI_15-067)

Under the Freedom of Information Act 2000 I seek the following information:

Q1 Please provide an organisation chart which depicts the structure of the University's Admissions function (Home, EU and International, UG, PGT and PGR) including activity undertaken outside of a university central team showing staff full-time equivalent (FTE) figures.

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

Release of an organisation chart depicting the functions of the admissions function of UEA would, or would be likely to, prejudice the commercial interests of UEA for the reasons outlined in the letter above.

Q2 Please provide job descriptions, key responsibilities and salary ranges for the posts identified in the Admissions function.

The job descriptions for all posts within the Admissions function are within the attached document entitled, 'Appendix A_Question 2 response.pdf'.

Salary ranges for the posts in question are available on our website. For all posts at Grade 5 or lower refer to the [Secretarial and Clerical Staff Salary Scales](#).⁴ For all posts at Grade 7 and above, please refer to the [Administrative, Library and Computer Salary Pay Scales](#).⁵ Please note that the two posts on Grade 6 are within the Secretarial and Clerical Salary Pay Scales.

Q3 What system do the admissions team use for processing applications?

Hobsons Apply Yourself and SITS by Tribal.

Q4 Please list the areas of responsibility included in your admissions team including but not exclusively CAS, Fee assessment, Disclosure and Barring Service etc.

The job descriptions provided in response to question 2 above provide a full enumeration of the areas of responsibility included within our admissions function.

Q5 Do you use a CRM or other enquiry management system? If yes, please state the system used.

Yes, we use an admissions enquiry system which is Hobsons Connect.

Q6 Do you have an applicant portal? If yes, what system does it operate with and what information/functions does it include?

No, we do not have an applicant portal.

⁴ <https://www.uea.ac.uk/documents/2506781/2665515/Secretarial+and+Clerical+Staff+-+August+2012+Pay+Award.pdf/cb82bffa-ca0c-4a02-9fb9-cb903f3b32ab>

⁵ <https://www.uea.ac.uk/documents/2506781/2665515/Administrative%2C%20Library+and+Computer+Staff+%28ALC%29%20-August+2012+Pay+Award.pdf/d6569dfc-af36-4e57-8722-d888d7940a4f>

Q7: Provide your target turnaround time, average turnaround time and percentage of those turned around within target when turning an application into an offer or reject.

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

Release of requested within this question would, or would be likely to, prejudice the commercial interests of UEA for the reasons outlined in the letter above.