

[REDACTED]

01 September 2015

Dear [REDACTED]

Freedom of Information Act 2000 – Information request (ref: FOI_15-139)

We have now considered your request of 02 August 2015 for the following information:

- ‘1. The total amount spent by your institution on student recruitment advertising for each of the past five years. These figures should also show the amount spent by type of advertising (eg newspapers, online etc).*
- 2. The specific amount paid to Google for each of these five years in respect of student recruitment online advertising.*
- 3. If your institution pays Google for online advertising, have the rates charged to you by this company increased, and if so when and by how much?*
- 4. Has your institution been required by Google to pay increased advertising rates at around the time of clearing, and if so, by how much?*
- 5. What is your institution’s student recruitment advertising budget for 2015/16?’*

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 harm the commercial interests of a person as defined by the Act

We have applied the same exemption to the data requested in each of your five questions, as it is our belief that release of any of the requested information would harm the commercial interests of the University.

The UK Higher Education sector is a highly competitive environment. Universities are seeking to recruit from a limited pool of prospective students, as well as competing to attract high quality staff, research funding and accreditation. In such an environment, certain information about the University can be seen to be commercially sensitive.

UEA, in common with other universities, undertakes advertising activities with the aim of promoting the institution to our target markets. Recruitment advertising, whether undertaken in a print or online environment, is a vital element of the University's overall marketing strategy, which we consider to be a commercial activity that directly affects our ability to compete within the Higher Education sector.

Our ability to deliver 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 details of our tactical marketing activities with competitors as this would provide them with the insight to match and potentially exceed our activities.

With particular regard to the information relating to Google, it is widely understood that an organisation's ability to secure adword position is effected by the level they are willing to "bid" for particular search terms. By disclosing our budget in this area we are effectively telling our competitors our headline Google strategy.

Under FOI, disclosure of information to one requester can be considered as release to the world. Disclosing the specific breakdown of requested costs would, in effect, provide our competitors with commercially sensitive information we consider to be integral to our marketing activities. We believe the University's ability to compete would be prejudiced in this case as our competitors could use this information to guide their own marketing plans to the detriment of UEA. For example, if we revealed we spent a certain amount on advertising, our competitors could simply spend more and as a consequence would be likely to gain a higher profile.

When considering the application of this exemption we are required to assess the public interest in withholding or disclosing the requested information. We acknowledge there may be a public interest in understanding how a University allocates funds to a particular resource. However, disclosing this information would be likely to prejudice the University's competitive and commercial position by damaging the efficacy of our marketing strategy. We would argue there is a stronger public interest in ensuring Universities are able to compete fairly against each other to recruit potential students. On balance, we believe the public interest lies in maintaining this exemption.

You have the right of appeal against this response. 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, 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