



Information Assurance and Governance  
Office of the Principal

12 October 2020

Dear Mr/Ms Shun,

**Freedom of Information (Scotland) Act 2002**  
**Our Ref: 301-20**

I refer to your enquiry dated 15 September 2020 asking to be supplied with information under the Freedom of Information (Scotland) Act 2002 (“the FOISA”) as outline below in relation to admission of international students to our A100 medicine degree programme.

- A list of international candidates (anonymous) who received offers with achieved grades, predicted grades, GCSE results, UCAT total score, interview score for academic year 2017/18, 2018/19 and 2019/20.

You are asking to be supplied with data on an individual basis with details pertaining to each applicant. When an individual applies for a place to study here in St Andrews, this is a private matter. Details of academic qualifications are provided to the University as part of the application process and there is no reasonable expectation that this personal information would be used for any other purpose and made publicly available, in an anonymised format or otherwise.

It is important to note that when information is released in response to a Freedom of Information request, this is disclosed into the public domain and not just to the person making the request. In this instance, the University is of the view that release of anonymised raw data as requested would prejudice substantially the University’s ability to maintain the trust and confidence of applicants; there is no expectation that specific details of the academic achievements of applicants will be made a matter of public record.

The University cannot guarantee that the data can be truly anonymised. In the event that data was released with the names of all applicants removed, it would still be possible for an individual to identify their own scores and grades from the resulting dataset. Release of the requested information would therefore lead to a breakdown of trust and significantly damage the relationship the University has with its applicants.

Such a disclosure would also negatively impact on the University’s:

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- Reputation and the relationship of trust that it has with its students and other members of the academic community who expect the University to protect and maintain privacy;
- Ability to attract and recruit students in a competitive environment; and
- Application process and the overall effectiveness of this.

The information is therefore being withheld under section 30(c), *Prejudice to the effective conduct of public affairs* of the FOISA.

### Public Interest

When applying the exemption cited above, the University must consider where the public interest lies. It is recognised that there is a public interest in transparency however, this must be balanced against the public interest in academic institutions being able to operate and discharge their functions effectively. It would not be in the public interest for information to be disclosed that could potentially undermine the effectiveness of the application and student recruitment process.

The University is of the view that the public interest lies in the University protecting the integrity of its relationship with prospective students and respecting the right to privacy of those individuals who interact with the University in a private capacity.

In reaching this decision, the University was guided by the Scottish Information Commissioner's *Decision 007/2019: Mr J and Edinburgh Napier University* where it was found that substantial prejudice to the effective conduct of public affairs was caused to relationships of trust and the integrity of operational practices through disclosure of information (anonymised survey returns) where there was an expectation that the views offered would remain between the individual and the University. The parallel here being the expectation that details of academic achievements disclosed to the University in a private capacity as part of the application process are a matter between the University and the prospective student concerned.

The said decision makes reference to "*the effect of disclosure on the relationships of trust and confidence the University must maintain*" accepting that such harm would not be in the public interest.

### Advice and assistance

It is noted that achieved/predicted grades and GCSE results for applicants is also not held in a reportable and verifiable format. Students who have the appropriate academic requirements are ranked on their UCAT score and the top 400 or so are then invited to interview. We could look to provide you with the lowest and mean UCAT score for the international/overseas cohort and if you would like to be supplied with this data as an alternative, please let me know and I will arrange for this to be processed.

For your further information, details of the entry requirements and the selection process can be found on the School of Medicine's website at: <https://www.st-andrews.ac.uk/subjects/entry/>.

## Your right to seek a review of how your information request was managed

If you are not satisfied with the University's response and/or our reasoning set-out above, you have the right to request a review of our decision. The timelines in which this right is available are set out in section 20(5)(a) and (b) FOISA and regulation 16 of the EIRs. In broad terms the right to seek a review must be exercised within 40 working days of receiving this response.

The Information Assurance and Governance team are currently working remotely due to the Coronavirus pandemic. Any request for review at this time should be sent by email to [foi@st-andrews.ac.uk](mailto:foi@st-andrews.ac.uk) stating:

- a) your name and address;
- b) details of your original request; and
- c) the reasons why you are dissatisfied with our response.

If you remain dissatisfied with how your request for information has been dealt with following Review, you also have the right to apply to the Scottish Information Commissioner (SIC) for a decision. In the event of an appeal to the SIC, the Commissioner will generally only be able to investigate the matters raised in the request for review.

Details on how to make an appeal online to the SIC can be found on their website: <http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>.

This concludes the University's response.

Yours sincerely

**JUNE WEIR**

Information Assurance and Governance Officer

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