

Mr R Manthorpe
request-602089-4c370023@whatdotheyknow.com

25 October 2019
Our Ref: FOI/1920/035

Dear Mr Connell

Your Freedom of Information Request

Thank you for your email of 30 September 2019 requesting a review of the University's response to your freedom of information request. The purpose of this appeal is to review the original response and confirm whether it has been dealt with correctly. For ease of reference, a copy of your request and our response is attached at Appendix 1.

Outcome of internal review

Review of decision

The University's Compliance Officer provided the response attached at Appendix 1 on 11 September 2019. On reviewing this and the rationale provided by senior members of the University's marketing team, I am satisfied that the exemption available under the Freedom of Information Act 2000 was correctly applied and that the University dealt correctly with your request. Whilst we acknowledge that there is a public interest in how public funds are used, universities operate in a competitive market and the amount spent on student recruitment is commercially sensitive information. In addition, the timing and allocation of marketing spend is likely to be useful to our competitors in drawing inferences as to the success of the University's recruitment strategies.

However, the University has considered your request again in light of the fact that Clearing has now ended and we can confirm that the overall advertising spend in relation to Clearing was approximately £90,000.

Public Interest Test

I am satisfied that the Public Interest Test was correctly considered in the original response and that the balance of the public interest lies in allowing the University to maintain its competitive advantage.

Your right to seek a review

If you are dissatisfied with the way in which we have handled your request for review you may ask the Information Commissioner to review our decision. You must submit your complaint in writing to the Commissioner within 6 months of receiving the response to review letter. The Commissioner may be contacted at:

Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113 / 01625 545 745 (+44 1625 545 745 if calling from overseas)
Fax: 01625 524 510

Yours sincerely

Samantha Burns
Acting General Counsel

APPENDIX 1

Your request	Our response
<p>Can you please tell me how much money you spent on advertising for clearing in 2019.</p> <p>Can you please provide subtotals for the following categories (feel free to break them down further if that's appropriate):</p> <ol style="list-style-type: none"> 1. Facebook 2. Instagram 3. Google - that is, search advertising 4. YouTube 5. Snapchat 6. Twitter 7. Other social networks (please specify) 8. Amazon 9. Online - that is, on websites excluding social networks, or those websites those listed above (this includes advertising using Google's ad network) 10. Television 11. National newspapers 12. Local newspapers 13. Magazines 14. Posters and billboards 15. Radio 16. Public transport billboards <p>For the online forms of advertising, can you also tell me how many clicks each advertisement received. Can you also provide any other data you have which indicates the engagement with each ad.</p> <p>For Google advertising, can you list which keywords you advertised against. Can you please indicate the cost-per-click in each case.</p>	<p>We confirm that we hold the information requested in these questions, but we consider that it would be contrary to the commercial interests of the University to release it. Information on how much Aston spends on its student recruitment activities could be used by our competitors to assess the effectiveness of the University's recruitment strategies. This would be likely to provide them with a competitive advantage, which in turn would be likely to harm the financial position of the University. We therefore claim the exemption available under section 43(2) of the Freedom of Information Act 2000 and will not be releasing the information.</p> <p>We have considered carefully whether it would be in the public interest for us to provide you with the information, despite the section 43(2) exemption being applicable. The University acknowledges that there is a legitimate public interest in the interests of transparency and accountability. However, there is also a public interest in protecting the ability of universities to compete on a level playing field and to ensure that there is fair competition between them. We have concluded that the balance of the public interest in this case lies in withholding this information.</p>



Aston University

BIRMINGHAM UK

<p>For Facebook, can you please supply</p> <ul style="list-style-type: none">- A list of the interests and/or demographics you targeted- If you used custom audiences, where you derived the data to make that custom audience from	
<p>Can you also provide an example of an ad in each of the above formats.</p>	<p>Please see Appendix 1.</p>