

Mr Richard Wong

By email only to: request-488207-26397c30@whatdotheyknow.com

19 June 2018

Dear Mr Wong,

Request for information under the Freedom of Information Act 2000 ("the Act")

Further to your recent request for an internal review of our original decision (reference number: 284.18), I am writing to confirm that the university is partially overturning its original decision of 8 May 2018.

Your original request

We received your information request on 31 May 2018 and treated it as a request for information made under section 1(1) of the Act.

You requested the following information:

All of the questions below relate to the Bachelor of Laws course – M100 Law

- 1. How many international students (Non EU) applied to the course M100 LLB law for the admission year 2015, 2016, 2017?**
- 2. What is the breakdown of nationality of students (Non-EU) for the admission year 2015, 2016, 2017?**
- 3. If the exact breakdown is not available, list the number of students from the following countries for the admission year 2015, 2016, 2017?**
 - ♦ Singapore
 - ♦ Hong Kong
 - ♦ China
 - ♦ Taiwan
 - ♦ Thailand
 - ♦ Malaysia
 - ♦ Indonesia

4. How many international students (Non-EU) received an interview for the admission year 2015, 2016, 2017?
5. How many international students (Non-EU) received an offer for the admission year 2015, 2016, 2017?
6. How many local students (UK and EU) applied to the course M100 LLB law for the admission year 2015, 2016, 2017?
7. How many local students (UK and EU) received an interview for the admission year 2015, 2016, 2017?
8. How many local students (UK and EU) received an offer for the admission year 2015, 2016, 2017?

Our original response

We provided the requested information in an attached spreadsheet. Where the total number of students from a particular country is less than 5, the university has replaced the figure with 'equal to or less than five' (≤ 5). The university considers that it is reasonably likely that students could be identified from the low numbers. Such identification would constitute a breach of one of the principles set out in the Data Protection Act 1998 (DPA). This approach is in accordance with the Information Commissioner's Office Code of Practice on Anonymisation. This information is therefore exempt from disclosure under section 40(2) of the Act.

This is an absolute exemption which means that the university does not need to consider the public interest in disclosing the information, we only need to establish that the exemption has been engaged. The methodology the university has adopted is a variation of the HESA standard rounding and suppression method.

Full details of the HESA methodology can be found on their website:
<https://www.hesa.ac.uk/about/regulation/data-protection/rounding-and-suppression-anonymise-statistics>

In relation to question 4 & 7 of your request this information is not recorded centrally as we do not keep records of who we interview for M100. We have determined that the cost of complying would exceed the appropriate limit set out in The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 and we are therefore refusing to comply with this part of your information request under section 12(1) of the Act. We assess whether an interview is required on an application by application basis and this is not recorded on a separate system or flagged on an application. To provide this information we would have to go through the notes section on every application for M100.

We have estimated that it would take at least 40 hours for us to locate and collate the information requested.

Your internal review request

On 18 June 2018, we received your request for an internal review of our original decision.

Your request stated the following reasons for review:

I would like clarification on the data as the numbers do not look right to me.

In an earlier FOI:

https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.whatdotheyknow.com%2Frequest%2Fadmissions_statistics_for_law_m1_5&data=01%7C01%7Cinfo-compliance%40kcl.ac.uk%7Cad3ab5b071a34019599108d5d48db3af%7C8370cf1416f34c16b83c724071654356%7C0&sdata=Lm8rGJvccuQavuJEdXOjCFrWF2Ryks1A7t7FWRd46O%3D&reserved=0

The the number of applicants totaled more than 2000+ on average whereas the data you have given me indicate that home + international students total less than 500 applicants.

Both FOIs were regarding the Law LLB (M100) programme at Kings College.

Our review

The university responded to your request on 5 June 2018, in line with our statutory obligations under section 10(1) of the FOIA which requires a public authority to respond within 20 working days.

We note that the basis of your internal review is whether the information provided is correct or whether incorrect information was provided to you. You have not disputed the use of the rounding methodology outlined in the original response, nor have you disputed the reliance on Section 12 for questions 4 and 7.

Accordingly, to investigate the original decision and respond to your internal review request, I have contacted the department which provided the information for the original response. In doing so I have focused on two questions:

1. Is the information provided correct in light of the issues raised in the internal review request.
2. If the information provided is correct, then is there reasoning that would explain the discrepancy between the information provided and the expectations of the requester as reflected by the internal review request.

In response to my questions above, the Admissions department has informed me that there does appear to have been an error in the data used regarding nationality. This

lead to the issues raised in the internal review request. The Admissions department apologises for this error and that it was not caught prior to the information being provided.

As such, the correct information is provided in attachment to this response. Please see attachment “316.18 – Annex A.” This correct information should be taken to replace the previously provided information.

Our decision

In conclusion, after reviewing the university’s original response and having conducted an independent investigation which has confirmed that there were errors in the information provided with the original response, I have decided to partially overturn the original decision. The reliance on Section 12 for questions 4 and 7 remains, as does the use of the rounding methodology in regard to the information provided.

This completes the university’s response to your internal review request.

Your right to complain

In the event that you are not content with the outcome of your complaint you may apply to the Information Commissioner for a decision.

The Information Commissioner can be contacted at the following address:

The Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

<https://ico.org.uk/>

Yours sincerely

Sean Mackaay
Information Compliance Manager