



Information Assurance and Governance
Office of the Principal

8 January 2021

Dear Calum,

Freedom of Information (Scotland) Act 2002
Our Ref: 438-20

I refer to your request for the following information under the Freedom of Information (Scotland) Act 2002, received on 8 December 2020:

- *The average 3000 and 4000 level module grades across the 2019/20 academic year, in both the School of History and the School of English.*

The University has reviewed the processes involved to respond to requests such as your own and during that review, it was established that:

- a) The University does not have any business requirement to work with average module grades. Averages say nothing meaningful about the performance of a module: given the range of variables that can affect module performance, average module data does not provide any means for comparison.
- b) Calculating average module grades is a multi-stage process which involves: (a) retrieval of data from the electronic student record; and (b) a process of data analysis and rationalisation, so that irrelevant data can be identified, removed and then substituted with the correct values, before an average can be calculated.
- c) The work involved in step (b), requires exercise of significant skill and judgement i.e. specialist knowledge of the operation of the University modular scheme and rules for academic progression to ensure that the retrieved dataset contains the correct elements, and if not, for the required values to be determined.

Having considered a series of decisions from the Scottish Information Commissioner ("the SIC"), including *Decision 030/2019: Mr H and the University of Edinburgh*, as to when 'new information is being created' and having assessed the internal business processes, the University is satisfied that the work at step (b) goes beyond the retrieval of information and the presentation of information in a summary or digest.

As/

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As a Scottish public authority is not required to create new information in order to answer an information request, in this instance, it follows that the information you seek is not held by the University. Freedom of information law requires that a Scottish public authority gives notice where information requested of it is not held. Under section 17(1) of the FOISA notice is therefore given that the information you seek would have to be created by the University and is therefore not held.

The University has previously answered similar requests for information. That said, the legislation requires that responses are made on a case-by-case basis. Significant resource is required to produce the information in answer to requests of this nature. The University in considering its obligations to operate efficiently and effectively has now found that creating new information to respond to such requests is not a use of public monies that can be justified.

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. 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 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,

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