

4 October 2019

RECORDS MANAGEMENT SECTION

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The University of Edinburgh Old College South Bridge Edinburgh EH8 9YL

**Rowland Manthorpe** 

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Sent by email: request-602179-f69b4930@whatdotheyknow.com

Email recordsmanagement@ed.ac.uk

Dear Mr Manthorpe

## Freedom of information request

Thank you for your email of 7 September 2019 requesting information about the University's expenditure on advertising for Clearing.

The University of Edinburgh is a global university, rooted in Scotland. We are globally recognised for our research, development and innovation and we have provided world-class teaching to our students for more than 425 years. We are the largest university in Scotland and in 2017/18 our annual revenue was £984 million, of which over £279 million was research income. We have over 41,000 students and more than 15,000 staff. We are a founding member of the UK's Russell Group of leading research universities and a member of the League of European Research Universities.

#### Clearing

UCAS Clearing is the method by which undergraduate students apply for university places after the main application scheme closes on 30 June. Clearing opens early in July and closes at the end of September each year. Any vacancies which a university has after 30 June will be advertised as Clearing vacancies.

Many applicants receive conditional offers during the UCAS main application scheme and do not receive their exam results until August. If more applicants fail to meet their conditions than anticipated, universities may find that they have additional places available at exam results time and may open degree programmes in Clearing for a short period of time to fill those places.

Universities in Scotland operate under a different regulatory regime to universities in other parts of the UK. These regulations include fee status arrangements which Scottish universities are required to follow.

Scottish universities are allocated a fixed number of funded undergraduate places by the Scottish Government for students with Scotland or EU fee status, in accordance with the Education (Fees) (Scotland) Regulations 2011. Numbers of Scotland/EU students are strictly controlled and universities are not permitted to exceed their allocated places. For

this reason, there are often few Scottish university places available in Clearing for Scotland/EU students.

Scottish universities may also admit undergraduate students from the rest of the UK (RUK) and from overseas. There are no Scottish Government restrictions on the numbers of these students who can be admitted, and universities set their own targets for these groups based on capacity. Separate recruitment targets are set for RUK students and international students because they make up different fee status groups.

## **Expenditure on advertising for Clearing**

You asked how much the University spent on advertising for Clearing in 2019.

In 2019 to date, the University has spent £2,129 advertising the availability of places for 2019 entry through Clearing. This was predominantly to advertise new programmes offered by the University for the first time in 2019.

## Engagement with online advertising and keywords advertised against

You asked for this expenditure to be broken down by a specified list of channels, and for data which indicates the engagement with each form of online advertising, including the number of clicks each advertisement received. For Google advertising, you also asked which keywords were advertised against, and the cost-per-click for each.

Unfortunately, whilst the University holds some of this information, I cannot supply you with it. This is because disclosing it would be likely to prejudice substantially the University's commercial interests. The Freedom of Information (Scotland) Act 2002 does not require us to provide this sort of information as it is exempt under section 33(1)(b).

This exemption is subject to the public interest test. The University acknowledges the public interest in openness and transparency, particularly in relation to its admissions processes. However, the University operates in a competitive environment and the public interest is also served by enabling higher education institutions to withhold information that could damage their ability to compete fairly with one another. If the University disclosed detailed information about its Clearing marketing strategy, it could be used by other institutions to alter their own advertising methods in ways that would substantially prejudice the effectiveness of the strategy and the University's ability to attract students during Clearing. Therefore, in this case, the University considers the public interest in withholding this information outweighs the public interest in disclosure.

#### **Examples of advertisements**

You asked for an example of each type of advertisement. The University purchased advertisements through a media buyer and does not hold examples of them.

### Interests and demographics targeted, and custom audiences

For Facebook advertising for Clearing, you asked for a list of interests and/or demographics targeted, and where custom audiences were derived from.

I am afraid I cannot tell you whether or not the University holds this information. This is because that would disclose whether or not the University used Facebook advertising for Clearing. As I have explained above, disclosing the channels of advertising used by the University, as part of its overall advertising strategy for Clearing, would be likely to prejudice substantially the University's commercial interests. The Freedom of Information (Scotland) Act 2002 does not require us to provide this sort of information as it is exempt under section 33(1)(b).

## Right to review

If you are dissatisfied with this response, you may ask the University to conduct a review of this decision by contacting the University's Records Management Section in writing (e.g. by letter or email) or in some other recorded form (e.g. audio or video tape). You should describe the original request, explain your grounds for dissatisfaction, and include an address for correspondence. You have 40 working days from receipt of this letter to submit a review request. The contact details for the Records Management Section are at the top of this letter. When the review process has been completed, if you are still dissatisfied, you may use the <a href="Scottish Information Commissioner's guidance on making an appeal">Scottish Information Commissioner's guidance on making an appeal</a> to make an appeal to the Commissioner. If you do not have access to the Internet, please let me know and I will provide a copy of the relevant web pages.

# Privacy notice for information request applicants

<u>The University of Edinburgh's request privacy notice</u>, which describes how we use the information you have supplied about yourself and your request, is published on the University website.

Yours sincerely

James Macfarlane

J. Macfarlane

**Deputy Information Compliance Manager** 

If you require this letter in an alternative format, such as large print or a coloured background, please contact the Records Management Section on 0131 651 4099 or email recordsmanagement@ed.ac.uk