

Paisley Campus Paisley PA1 2BE

Tel 0141 848 3000

Our ref: F19/206

7<sup>th</sup> October 2019

Dear Mr Manthorpe

## Freedom of Information (Scotland) Act 2002 - Information requested

Your request for information has been considered and our response is as follows:-

You requested the following information

How much money you spent on advertising for clearing in 2019.

This financial information has not been released as the exemption under section 33(1)(b) of the Act applies, as detailed below.

#### Section 33(1)(b) Commercial Interests and the economy

The information requested contains business and financial information which is not in the public domain. Release of this information would be detrimental to our commercial interests. We are operating in a competitive market in direct competition with other educational institutes for students. Thus we cannot disclose strategically useful information into the public domain, which other educational institutes may use when determining their own marketing and advertising strategies. In addition release of information relating to our marketing and advertising spend in to the public domain would be detrimental to our commercial interest as it would allow other educational institutes in direct competition with us to use this information when determining their financial business model for marketing spend. This exemption is a qualified one and a public interest test is applicable.

Can you please provide subtotals for the following categories (feel free to break them down further if that's appropriate):

- 1. Facebook
- 2. Instagram
- 3. Google that is, search advertising
- 4. YouTube
- 5. Snapchat

#### 6. Twitter

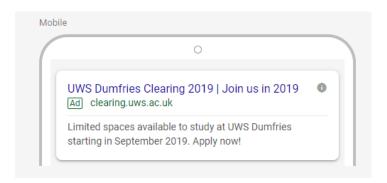
7. Other social networks (please specify) 8. Amazon 9. Online - that is, on websites excluding social networks, or those websites those listed above (this includes advertising using Google's ad network) 10. Television 11. National newspapers 12. Local newspapers 13. Magazines 14. Posters and billboards 15. Radio 16. Public transport billboards

### Please see response to Question 1.

Can you also provide an example of an ad in each of the above formats.

## In relation to Clearing 2019 UWS advertised on the following 3 platforms:

## Google



### Facebook/Instagram



## Local press:



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.

The information in relation to how many clicks each advert has received has not been released as the exemption under section 33(1)(b) of the Act applies, as detailed below.

#### Section 33(1)(b) Commercial Interests and the economy

The information requested contains business information which is not in the public domain. Release of this information would be detrimental to our commercial interests. We are operating in a competitive market in direct competition with other educational institutes for students. Thus we cannot disclose strategically useful information into the public domain, which other educational institutes may use when determining their own marketing and advertising strategies. This exemption is a qualified one and a public interest test is applicable.

For Google advertising, can you list which keywords you advertised against. Can you please indicate the cost-per-click in each case.

### See response above.

For Facebook, can you please supply

- 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

#### See response above.

If you are not satisfied with the handling of your enquiry you have a right to review under the Act as laid out in the notices below.

Yours sincerely

Freedom of Information Office University of the West of Scotland

#### Notices

# 1. Right of Review

In the event that you are dissatisfied with the handling of your request for information, you may require us to review our actions and decisions relating to your request ('Review Request').

Your Review Request must be made to us in writing or in other durable form, stating your name and address for correspondence, specifying the request for information to which your Review Request relates and the matters that have given rise to your dissatisfaction.

It must be provided to us within 40 working days (which phrase excludes Saturdays, Sundays, Christmas Day and Scottish Bank Holidays) after the expiry of the period within which we were obliged under the Act to respond to your request for information.

You may withdraw your Review Request by notice to us in writing at any time.

Assuming your Review Request is not withdrawn, we are required to conduct our review and respond to you ('Review Response') within 20 working days (which phrase excludes Saturdays, Sundays, Christmas Day and Scottish Bank Holidays) after the date on which we received your Review Request. The request for review should be addressed to:

Emma Cuckow, University Solicitor, University of the West of Scotland, Paisley Campus, Paisley, PA1 2BE Email: <a href="mailto:Emma.Cuckow@uws.ac.uk">Emma.Cuckow@uws.ac.uk</a>

## 2. Right of Appeal

In the event that you have not withdrawn your Review Request and we have failed to respond to you within the proscribed time, or you are dissatisfied with our Review Response, you may apply to the Scottish Information Commissioner for a decision as to whether we have dealt with your request in accordance with the Act ('Appeal Application').

Your Appeal Application must be made to the Scottish Information Commissioner in writing or in other durable form, stating your name and address for correspondence, specifying the request for information to which your Appeal Application relates and the matters that have given rise to your dissatisfaction.

It must be provided to the Scottish Information Commissioner within six months after the date you received our Review Response or, in the event that we did not provide you with a Review Response within the proscribed time, within six months after the expiry of that period. The address of the Scottish Information Commissioner is:

Scottish Information Commissioner, Kinburn Castle, Doubledykes Road, St Andrews, Fife, KY16 9DS Tel 01334 464 610; Fax 01334 464 611; email: enquiries@itspublicknowledge.info; www.itspublicknowledge.info