



Royal Holloway
University of London
Egham, Surrey
TW20 0EX

Dr David Ashton
Deputy Principal (Operations)

Principal's Office
01784 414927
david.ashton@royalholloway.ac.uk

www.royalholloway.ac.uk

George Mounokoliavitz
Via email to: request-589646-daf19992@whatdotheyknow.com

1 October 2019

Dear George Mounokoliavitz,

Freedom of Information – Internal Review Outcome

Further to your email of 14 August 2019, in which you expressed dissatisfaction with the College's response to your Freedom of Information request, I confirm that an Internal Review has been carried out. The Internal Review panel comprised myself and Elaina Moss, Director of Governance and Legal Services. Rachael Pymm was present as Secretary to the panel. The purpose of this letter is to confirm the outcome of the review.

Scope of Internal Review

In undertaking the review, the panel took into account all factors relevant to the issue. In particular, we considered:

1. The terms of your original request (hereafter 'the request')
2. Any information held by the College within the scope of the request
3. The College's response to the request
4. Your email of 14 August 2019
5. The College's obligations under the Freedom of Information Act 2000 (FOIA)
6. Any other relevant legislation and guidance, including best practice guidance issued by the Information Commissioner's Office (ICO).

The panel noted from your email of 14 August 2019 that your dissatisfaction centred upon the College's decision to withhold the number of candidates who applied for a course in Law through Clearing; the number of candidates whose applications through Clearing were accepted; and, a breakdown of the A-level grades of those candidates, under section 43(2) of the Freedom of Information Act.

The panel noted that the College's response was issued within 20 working days of receipt, as required under Section 10 of the FOIA.

The Internal Review Panel's findings

The panel noted the points made in your email of 14 August. The panel noted the provision of certain information on the UCAS and Which? Websites and also noted that the request sought considerably greater detail than that currently available in the public domain.

The panel considered the contention that the data requested would be unlikely to have sufficient predictive value for a rival institution, and the suggestion that the College's explanation of its application of the section 43 exemption was not sufficiently detailed. The panel concluded that the requested information would have significant predictive value for a rival institution with respect of revealing elements of the College's recruitment strategy. If such data were released into the public domain, it could be exploited by rival institutions with the effect of undermining the College's recruitment strategy, thereby prejudicing the College's ability to effectively recruit students to its courses. As a publically-funded institution, such a scenario would not be in the public interest, as it would inhibit the College's ability to derive value for money in its recruitment activities and risk the future sustainability of the College.

The panel therefore confirmed the College correctly applied the exemption at section 43(2) of the Freedom of Information Act to withhold the requested information as its release would prejudice the College's commercial interests.

Conclusion

The panel upholds the College's original response, and withholds the information requested under section 43(2) of the Freedom of Information Act. The panel hopes the information provided in this letter serves to further explain the College's response.

If you are dissatisfied with the outcome of the Internal Review, you have the right to appeal directly to the Information Commissioner for a decision. The Information Commissioner can be contacted via their website www.ico.org.uk, or at the following postal address:

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

Yours sincerely,



Dr David Ashton
Deputy Principal (Operations)