



Freedom of Information Request 236/20-21

Response Date: 22/04/2021

I am writing to make an open government request for all the information to which I am entitled under the Freedom of Information Act 2000.

Please could you provide a breakdown of advertising and marketing expenditure by line item. If this could be submitted as an excel that would be much appreciate. Ideally this would cover the following questions:

1. What has been the total annual budget for marketing over the last 5 years (2017-2021)?
2. How much of the marketing budget is spent on in-house marketing and how much is spent on 3rd party providers (e.g. Agencies)?
3. What are they types of third party services used e.g. (managed marketing services, content creators, self-service platforms) and how is the expenditure distributed among them?
4. How much of the marketing budget is spent on digital advertising and how much is spent on traditional advertising methods?
5. What is the segmentation of digital expenditure by channel (e.g. how much is spent on Facebook ads, Google ads etc.) ?

If this request is too wide or unclear, I would be grateful if you could contact me. If any of this information is already in the public domain, please can you direct me to it, with page references and URLs if necessary.

RESPONSE

Your request has been considered and the University is not obliged to provide you with the information.

Section 17 of the Freedom of Information Act 2000 requires Swansea University, when refusing to provide such information (because the information is exempt), to provide the applicant with a notice which:

- (a) states the fact,
- (b) specifies the exemption in question and
- (c) states (if it would not otherwise be apparent) why the exemption applies.

In relation to your particular request, the following exemptions apply:

Section 43(2) - Commercial Interests

Section 43(2) refers to information being exempt from disclosure if its disclosure would, or would be likely to; prejudice the commercial interests of any person (including the public authority holding it).

Section 43(2) is a qualified and prejudice based exemption therefore the legislators accept that there may be harm if released. The authority has to consider and describe the harm that would occur if the information were released and carry out a public interest test.

The 'public interest' is not however, what the public may find interesting, there must be some tangible benefit to the community in such disclosure. Ultimately it must be something which serves the interests of the public. It is a requirement to identify all the factors which serve these interests and also those which do not, only then can a decision be made.

Overall Harm



Swansea University
Prifysgol Abertawe

Disclosing information relating to the University's marketing expenditure could give potential competitors an insight into its marketing, advertising, and recruitment strategies. It would also give competitors an insight into its operational and financial performance in a market that is already highly competitive.

Public Interest Considerations

Factors favouring disclosure

There is a requirement to provide to the general public a better understanding of how public funds are spent. One of the underlying principles of the Act is the need for openness and transparency. In this case, there is a public interest in establishing how much the University spends on marketing and what methods of marketing is used.

Factors favouring non-disclosure

Swansea University has a duty to protect the sensitive commercial information it holds. In this case, to release details of the University's marketing expenditure and the methods used would allow our competitors to gauge the size, shape and capability of the University's marketing operations and use the information to their advantage during a period of extreme turbulence to inform their strategic planning and marketing activity. It could also have the additional effect of diminishing the University's ability to negotiate on a level playing field with external suppliers and put the University in a weaker position.

Balance Test

In this case, there is a public interest in the use of public funds which needs to be weighed against the damage that would occur to release the financial information that is requested. Releasing such financial information would prejudice and weaken the University's position against its competitors in a highly competitive commercial market. Therefore, on balance, the factors favouring non-disclosure outweigh the factors favouring disclosure.

As such, the public interest favours non-disclosure of the information at this time. Therefore in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

This letter represents a refusal notice for this part of your request.

END OF RESPONSE

