

From: Freedom of Information

Sent: 18 September 2020 15:51

To:

Subject: Freedom of Information Response (Our Ref: K/20/308)

Dear

Freedom of Information Response (Our Ref: K/20/308)

Thank you for your clarified Freedom of Information (FOI) request dated 7 September 2020, reference K/20/308.

Your original request read:

“Under the Freedom of Information Act, I'd like to request the following data for the financial years 16/17, 17/18 and 18/19 - presented per year.

- Marketing and Student Recruitment budgets
- Marketing and Student Recruitment spend broken down by type of spend
- Advertising spend broken down by type of advertising
- Events spend”

Your clarification read:

- *“What “type of spend” means in the context of your request*
 - Whether the advertising was online, in home, out of home etc. basically what sort of advertising was purchased
- *Whether your third and fourth questions are specific to Marketing and Student Recruitment (e.g. advertising spend as part of student recruitment) or intended as separate questions*
 - All specifically marketing and student recruitment please
- *What information you are seeking in relation to “events spend”*
 - All student recruitment related- open days, HE fairs etc”

The University of Leeds may hold some of information relevant to your request. However, we consider that to respond to your request as it is currently framed would exceed the cost limit as set out in Section 12(1) of the FOI Act. Section 12(1) states that a public authority can refuse a request if complying with it would exceed the appropriate limit of £450. For the purposes of FOI, time spent on the permitted activities is calculated at the flat rate of £25 per person, per hour. The appropriate limit therefore represents the estimated cost of one person spending 18 hours to determine whether the information is held, and to locate, retrieve and extract the information.

We have outlined the reasons for invoking Section 12(1) below.

We do not have a single Marketing and Student Recruitment budget. Instead, we have multiple marketing teams within each of the seven University Faculties (all with their own budgets), plus teams relevant to your request which form parts of the wider

admissions team, international office and educational engagement team. This means there are at least ten teams or departments which would need to locate and collate information for your request. We estimate that it would take each team a minimum of one hour per financial year to locate the information you have requested, identify the information which is relevant to your request (i.e. type of spend, type of advertising, spend which is related to events) and collate a response. It is likely that it would take some teams significantly longer than this, particularly where it is not immediately apparent whether information is related to advertising and recruitment. To give a hypothetical example, while a contract with an advertising agency to run television adverts encouraging future students to consider applying to the University of Leeds clearly relates to student recruitment advertising, a rental payment made to an organisation to host a taster session for local students may not be readily identifiable as spend relevant to your request. This one-hour estimate is therefore not a guarantee that every team would be able to locate the information within that timeframe. However, even on this basis, it would take over 30 hours to collate the information you have requested. This is more than the 18-hour appropriate limit set out at section 12(1) of the FOI Act.

Under our section 16 duty to advise and assist, we are required to provide information to applicants who have had a request refused under section 12(1) to assist them in reframing their request in order to reduce the total amount of time required. In this case, if you were to resubmit your request and limit the timeframe to a single year and to a single team or faculty, we may be able to complete your request within the appropriate limit. However, we would also note that the more specific your request is, the more likely it is that some or all of the information will be exempt under section 43(2), which exempts commercially sensitive information. You may therefore wish to limit your request to totals or cumulative figures.

We hope this information is helpful. If you have any questions about this email, however, please do not hesitate to contact us on foi@leeds.ac.uk

If you are unhappy with the service you have received in relation to your request and wish to make a complaint or request a review of our decision, you can request an Internal Review. Requests for Internal Review should be made in writing using the following contact information:

Post: Mr D Wardle
Deputy Secretary
The University of Leeds
Leeds
LS2 9JT

Email: foi@leeds.ac.uk

Requests for Internal Review should be submitted within 40 working days of receiving the University's response to your request. Further information about how the University manages Freedom of Information requests and about our complaints procedure is also available on our website (www.leeds.ac.uk).

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the review/complaints procedure provided by the University. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Kind regards

Chloe Wilkins

Freedom of Information Officer

Secretariat

University of Leeds