Dear

Freedom of Information Response (Our Ref: K/21/104)

Thank you for your Freedom of Information (FOI) request dated 23 February 2021, reference K/21/104.

Your request read:

“Under the Freedom of Information Act 2000, I would like to make request regarding the careers support at your University.

I would like to recieve data for the academic 2019/0 and 2020/1.

I would like to know specifically the main platform that careers use, career hub, target connect, handshake and the yearly cost.

I would also like any DPIA forms that have been undertaken in relation to these platforms, if possible.”

The University of Leeds holds this information.

The platform used in both 2019/20 and 2020/21 was Target Connect from GTI media.

We are withholding information regarding the contract value under section 43(2) of the Freedom of Information Act. Section 43(2) sets out that information can be withheld if disclosure would, or would be likely to, prejudice the commercial interests of any person or organisation, unless there is an overwhelming public interest in disclosure.

To release this information would provide competitor providers with an unfair advantage over GTI media when the contract is next up for retendering. Doing so would reveal to competitors information about GTI media’s income and the services they provide to the University of Leeds for the contracted cost. This would allow competitor organisations to ‘undercut’ GTI media, handing them a distinct advantage. This clearly demonstrates the prejudice which would be likely to occur as a result of disclosure of the requested information.

Section 43(2) is a qualified exemption, which means that we are also required to consider whether there is a strong public interest in the disclosure of the information. While we recognise the public interest in understanding how and where the university spends money, we consider there to be a much stronger public interest in ensuring the university receives the best value for the money it spends. As outlined above, the release of the requested information would be likely to artificially deflate
future bids. While this may appear to represent a benefit to the University, in fact a lower price does not necessarily relate to better value for money. It is essential that bids from tending organisations are based on their own individual areas of expertise, and that prices genuinely reflect the service being offered. An artificially lowered price would therefore be likely to unreasonably skew future tendering processes. We therefore consider the public interest to be strongly in favour of withholding the contract information you have requested.

We are withholding the Data Privacy Impact Assessment (DPIA) completed in relation to the careers platform under sections 40(2) of the Freedom of Information Act and section 31(1)(a).

Section 40(2) sets out that information is exempt from disclosure if it is the personal data of someone other than the person making the request, and disclosure would; contravene the data protection principles; contravene an objection to processing; or if the data is exempt from the right of subject access.

You can find a template version of our DPIA on our website. The nature of the information which needs to be included in the form is such that, if the completed document were to be released, there would be a genuine risk that the information contained within could be used (in conjunction with other information available in the public domain) to identify individual members of staff/students. DPIAs are completed in order to ensure that personal information is protected from unnecessary and inappropriate disclosure, and as such disclose would be both unfair to the individuals at risk of identification (thus engaging the exemption) and would undermine the DPIA process.

Section 31(1)(a) sets out that information is exempt if its disclosure would or would be likely to prejudice the prevention or detection of crime. The DPIA includes detailed information about the personal information which is held, and also on the logistical arrangements for holding that data, such as where the information is located and how it is protected. We therefore consider that to release this information would increase the University’s vulnerability to cyber-attacks targeting personal information of this nature.

Section 31(1)(a) is a qualified exemption, which means that we are also required to consider whether there is a strong public interest in the disclosure of the information. There is a very strong inherent public interest in protecting organisations and individuals from the impact of crime. In this case, if the information could be used to target university systems, thus impacting on our ability to deliver learning for students, but also on the individuals whose data is held in the systems, potentially exposing them to further fraud and other criminal activity. We are therefore satisfied that the public interest is very strongly in favour of withholding the DPIA information.

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.

Yours sincerely

Chloe Wilkins
Freedom of Information Officer

Secretariat  
University of Leeds