

Mr John Gilchrist
Freedom of Information Officer

7 September 2018

Ref: FOI/August 2018/ Georgia Edkins

By email to Georgia.Edkins@dailymail.co.uk

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Dear Ms Edkins

Your request for information received on 16 August 2018 has been dealt with under the provisions of the Freedom of Information Act 2000 (FOIA).

You asked:

Please answer my questions in line with the Freedom of Information Act 2000.

How much money did you spend each year from 2015 to 2018 on advertising to recruit students? This includes adverts with mention of 'clearing'.

- Please break down your answer per advertising campaign and name each of those campaigns.
- Please break down the budget for each campaign – ie. How much spent on actors, on studio time etc.
- Per advertising campaign, please say in what medium they were transmitted through – ie. Via radio, TV, social media...
- Who ran each campaign? ie. Was the project outsourced – if so – to who and at what cost? Was it in-house – who did it and at what cost?

University Response

Since 2015, Middlesex University has run three advertising campaigns each year - Undergraduate, Postgraduate and Clearing.

Each campaign included social media and web advertising (google search, re-targeting, programmatic).

Campaigns are run collaboratively between the in-house marketing campaigns and digital teams with outsourced support from specialist advertising agencies.

The remaining information requested on costs is regarded as competitive data and is not available to our competitors.

Section 44 (1)(a) of the Freedom of Information Act 2000 permits the University to withhold information if its disclosure would be prohibited by law. Due to competition law, under the Competition Act 1998, the University must exercise caution in releasing any information of a strategic nature such that it may constitute an exchange that would infringe competition law by placing it in the public domain where it could potentially be accessed by other Higher Education Institutions.

Competition law is seen to be infringed if parties do not actually agree on an anticompetitive act but exchange information that would lead competitors to understand how and what benchmarks have been set.

This would include the release of strategic, or strategically useful, information. It is therefore necessary to withhold such information that is not already in the public domain and would include specific information about the University's clearing operations. Such information has therefore been withheld because the University believes that its release would breach the Competition Act 1998.

By disclosing the information it would be placed in the public domain where it would be readily accessible to other institutions in the Higher Education sector; thus it could adversely affect the free competition between institutions.

This is an absolute exemption and the University is not required to consider the public interest in the release of this data.

I trust this satisfies your request sufficiently. Under the Freedom of Information Act 2000, you have the right to complain about the University's response to your request for information. If you have such a complaint, you may contact Mrs Teresa Kelly, Clerk to the Board of Governors, Middlesex University, Hendon campus, London NW4 4BT, tel: 020 8411 6018, t.kelly@mdx.ac.uk within 40 days of the date of this letter for a review of the University's decision. If you remain unsatisfied with the outcome of that complaint, you may seek further recourse by lodging an appeal with the Information Commissioner.

Yours sincerely

John Gilchrist
Freedom of Information Officer