

Request Reference: 3609

FOI Request dated 27/02/2026 -

1. *Please provide a contact name and email address in case we need to contact you for any clarification regarding your responses.*
2. *Please select your institution:*
3. *Other institution*
4. *What was your institution's total expenditure on marketing and advertising aimed at domestic student recruitment in the 2023/24 financial year?*
5. *What was your institution's total expenditure on marketing and advertising aimed at domestic student recruitment in the 2024/25 financial year?*
6. *What was your institution's total expenditure on marketing and advertising aimed at international student recruitment in the 2023/24 financial year?*
7. *What was your institution's total expenditure on marketing and advertising aimed at international student recruitment in the 2024/25 financial year?*
8. *How many staff (in FTE) are currently employed in marketing roles at your institution?*
9. *What was your institution's total expenditure on marketing staff remuneration in 2023/24?*
10. *What was your institution's total expenditure on marketing staff remuneration in 2024/25?*
11. *Did your institution attend the Times Higher Education Awards in Edinburgh on 13 November 2025?*
☐ Yes
☐ No
12. *What was your institution's total expenditure in attending the Times Higher Education Awards on 13 November 2025?*

Response

1. **foi@hull.ac.uk**
2. **University of Hull**
3. **Other institution N/A**
4. **What was your institution's total expenditure on marketing and advertising aimed at domestic student recruitment in the 2023/24 financial year?**

Section 1 of the Freedom of Information Act 2000 (FOIA) places two duties on public authorities. Unless exemptions apply, the first duty at Section 1(1)(a) is to confirm or deny whether the information specified in a request is held. The second duty at Section 1(1)(b) is to disclose information that has been confirmed as being held. Where exemptions are relied upon Section 17 of FOIA requires that we provide the

applicant with a notice which: a) states that fact b) specifies the exemption(s) in question and c) states (if that would not otherwise be apparent) why the exemption applies.

We therefore apply Section 43 (2) Prejudice to Commercial Interests, for questions 4-7. We have applied this exemption to the total cost of the University's marketing department's staffing and outsourced marketing contracts. It is our belief that release of this information would be likely to prejudice the commercial interests of the University.

To compete in the Higher Education market, with leading UK and international universities, the University must ensure that information that would be strategically useful to its competitors is not placed in the public domain. Release of such information would potentially compromise the University's ability to attract and recruit the high-quality students, which enable it to be a progressive and sustainable institution. The University's position would be compromised if it were to release information that would benefit its competitors.

The Higher Education market is highly competitive, with over 160 institutions in the UK competing to recruit high-quality students and staff, research funding, and accreditation. University, in common with other universities, undertakes various marketing and advertising activities with the aim of recruiting and attracting students from the UK and overseas.

The amounts we invest in both staffing our marketing department and outsourcing to our external marketing stakeholders directly affects our ability to successfully promote, market and advertise the University all of which are vital commercial activities allowing us to compete within the sector, and as such these overall costs would be strategically useful to our competitors. Disclosure of the requested information would potentially compromise the University's commercial interests, that is, our ability to attract, recruit and retain students.

The University's success in promoting our reputation and attracting, recruiting and retaining students from our advertising and promotional campaigns and knowledge of the market is directly affected by the overall amounts we choose to invest in both our marketing department staff and outsourcing to our external marketing stakeholders; who undertake commercial marketing activities on our behalf.

The amounts we choose to invest in staffing the University's marketing department and outsourcing our marketing activities provides us with an advantage over our competitors who may undertake these activities less effectively. These investments are essential to how we deliver an advertising or promotional campaign, target and recruit potential students, and our success in doing so. The information therefore carries a measurable economic value and is commercially sensitive information.

This information is not shared with our competitors or made public in any way. Equally, our competitors do not share this data with us. We therefore have to ensure that information which would be strategically useful to our competitors is not placed in the public domain. Release of the requested information would potentially prejudice the University's ability to compete in the market. In a competitive commercial environment, disclosure of this data would have a measurable impact on our share of the market which is likely to result in financial and reputational loss to the University.

We believe that such prejudice to our interests would be likely to occur, given the consistent treatment of the information as commercially sensitive, by not only the University of Hull but by other higher education institutions, and the degree to which the recruitment of the number and nature of applicants is now critical to any university's success.

The Information Commissioner's Office have considered an appeal on similar facts and concluded that it is appropriate to apply s.43 (2) to requests for University marketing spend and activity. This is recorded on the decision notice - FS506683711.

Public Interest Test

The application of this exemption requires an examination of the public interest in disclosure as opposed to that in non-disclosure.

The factors in favour of disclosure:

- Increasing public understanding of insourced and outsourced marketing expenditure at the University
- There is significant public interest in use of funds by universities to market themselves

Factors in favour of withholding:

- Protecting the ability of public authorities to compete on a level playing field
- Preventing a distortion of the market for admission to higher education by disadvantaging one institution

After consideration of the above factors, we believe, on balance, that the public interest lies in maintaining the exemption.

5. What was your institution's total expenditure on marketing and advertising aimed at domestic student recruitment in the 2024/25 financial year? Exempt as per Q2
6. What was your institution's total expenditure on marketing and advertising aimed at international student recruitment in the 2023/24 financial year? Exempt as per Q2
7. What was your institution's total expenditure on marketing and advertising aimed at international student recruitment in the 2024/25 financial year? Exempt as per Q2
8. How many staff (in FTE) are currently employed in marketing roles at your institution? On 01 March 2026 there were 30 FTE staff in marketing roles at the University of Hull.
9. What was your institution's total expenditure on marketing staff remuneration in 2023/24? £1,084,007.88 (including TSS) or £1,069,158.20 (excluding TSS)
10. What was your institution's total expenditure on marketing staff remuneration in 2024/25? £700,027.32 (including TSS) or £697,044.35 (excluding TSS)
11. Did your institution attend the Times Higher Education Awards in Edinburgh on 13 November 2025? No
12. What was your institution's total expenditure in attending the Times Higher Education Awards on 13 November 2025? N/A as per Q11