

Request Ref: 2791

FOI Request dated **10/01/2023** as follows –

- Please could you tell me how much money (£) the university paid to international recruitment agents/agencies to recruit/enroll international students for each of the following years: 2019, 2020, 2021, 2022.*

- For each of those years, please also tell me how many international students were successfully recruited/enrolled via a recruitment agency.*

- If possible, for each of those years could you please break down the money spent into whether it was a flat fee paid to recruiters or whether it was commission paid once a student was recruited.

**I appreciate that the definition of international fee-payers/students has changed over this time frame - so, for the avoidance of doubt, please consider international students to mean any student whose home address is outside of the UK, including those from EU countries.*

Response

The University of Hull can confirm we hold this information. However, we consider that the detail of these formal agreements and commission figures are commercially sensitive, and is therefore exempt from disclosure under section 43(2) of the FOI Act.

Section 43(2) sets out that information is 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.

The recruitment of international students is an extremely competitive marketplace. To reveal the number of agreements held, the numbers of students recruited and the value of agreements would disadvantage both the University, and the agents with whom we work, by revealing sensitive commercial information to competitors.

It would not be difficult for those with some understanding of the marketplace to establish which organisations the University works with, and therefore calculate how much individual agreements are worth. To reveal the nature and value of agreements held with agents would allow their competitors to undermine them, unfairly disadvantaging incumbent providers. We consider that this would, in turn, be likely to damage relationships between the University and agents, dissuading agents from working with the University in the future, or increasing cost to secure agreements. Any damage to working relationships between the University and its existing agents carries a risk that the agreement will not be renewed on current terms, and the University will lose out commercially as a result.

The University would also be likely to suffer commercial disadvantage by revealing our commission rates following the engagement of agents. This could allow other competitor universities within the UK and worldwide to change their approaches in the market (reduce charges, offer more favourable terms etc.), benefiting from the advantage of this information.

Although there is a transparency required for how we as a University use our funding, if we were to publish how many agents and how much total commission we have paid, it would be relatively simple to work back through tuition fees (which are publicly available) and work out what are commission rates are. Further to this sharing our international enrolment data in this way could provide competitors with valuable marker intelligence on the profitability or otherwise of our agents portfolio.

We are therefore satisfied that the disclosure of the requested information would be likely to prejudice the commercial interests of both the University, and agents with whom we agreements with. Therefore Section 43 (2) is engaged on this occasion.