

[REDACTED]

16 January 2017

INTERNAL REVIEW - REFERENCE 16115

Dear [REDACTED]

We refer to your email of 11 November 2016 where you requested an internal review under the Freedom of Information Act 2000 (FOIA) with regard to the response you received from the London Legacy Development Corporation (Legacy Corporation) in relation to your information request reference as above.

The internal review has been completed and the findings and recommendations of the internal review are as follows:

1. Background

1.1. The original request was received on 2 November 2015 and asked for:

“Please can you provide the rental agreement between LLDC and London Lions basketball team, LLDC and Queensberry Promotions and all agreements between LLDC and British Volleyball Federation for use of the Copper Box Arena.”

1.2. LLDC’s response was sent on 9 November 2016 and confirmed that LLDC held this information (noting that the Copper Box Arena is operated by Greenwich Leisure Ltd (GLL) on behalf of LLDC and the requested agreements are therefore between GLL and the other parties). The three requested agreements with redactions were provided as annexes to the response:

- Annex A (Tenancy agreement between GLL and London Lions [redacted])
- Annex B (Contract for Hire Venue between GLL and Queensbury Promotions Ltd [redacted])
- Annex C (Contract for Hire Venue between GLL and Volleyball England [redacted])
- Annex D a schedule of the redactions with the specific exemption applied.

1.3. The original response and its annexes can be found at Appendix 1. These were provided as PDF documents to the requestor via the What Do They Know email address provided.

1.4. The requestor asked to be provided with fully legible copies of Annex A and B on 9 November 2016 as the copies supplied were of “a poor scan quality” and the requestor stated it was “difficult to read any information contained within the contracts that has not been redacted.”

1.5. LLDC responded on 9 November 2016 that it would ask GLL if it could provide clearer scans. However, having made enquiries, GLL confirmed its originals were in archive and the electronic documents they held were of the same standard and LLDC notified the requestor of this on 11 November 2016.

1.6. The internal review request received on 11 November 2016:

"I am writing to request an internal review of London Legacy Development Corporation's handling of my FOI request 'Copper Box Rental Contracts'.

In particular I would like it investigated why both the operator (Greenwich Leisure Ltd (GLL)) and LLDC possess copies of contracts for usage of their facilities which are not legible nor readable.

I am not yet challenging the clauses used for redactions as the documents are not clear in what is and is not being redacted. I am not in a position to be able to review the information requested. Therefore this request for review only focuses on the original copies presented as a response to my FOI request and in no way should prejudice any potential decision to challenge any redactions.

A full history of my FOI request and all correspondence is available on the Internet at this address:

https://www.whatdotheyknow.com/request/copper_box_rental_contracts

2. Review findings:

2.1. The internal review panel reviewed the PDFs of the agreements sent under Annex A and B and, whilst acknowledging that the quality of these could be clearer, disagreed that they were not legible nor readable.

2.2. The internal review panel then looked at the information published on https://www.whatdotheyknow.com/request/copper_box_rental_contracts. This offers two ways to view the agreements either Download PDF or HTML. The panel compared the PDF with the HTML versions of the response, Annex A, Annex B and Annex D and took screen shots of each page to compare the legibility of the versions. This comparison can be found at Appendix 2.

2.3. The panel found that HTML version provided on the What Do They Know website appears to differ significantly from the PDF version in terms formatting changes and missing sections. The panel recognise that if the HTML version was viewed, it would be difficult to read the agreements. However, the panel found that the PDF versions available on the What Do They Know website were readable, albeit with the same acknowledgement noted above that the quality could be clearer.

2.4. The internal review panel also noted that Annex D (schedule of redactions) was set out in a table showing the page number and description of the redactions applied to each agreement. In the PDF version the table formatting is preserved however in the HTML version this information appears as an unformatted list which makes it difficult to read or to identify the corresponding location in the agreements that the redactions have been applied.

2.5. A screen shot comparison of Annex C was not undertaken as this Annex was not specified in the internal review request. However, the internal review panel noted

that there was no discernible difference in quality between viewing the document through the PDF Download or HTML function on the What Do They Know website.

- 2.6. The internal review panel were not able to investigate the technical aspects of why the PDF and HTML versions of the response, Annex A, B and D differ, or why there is no discernible difference in quality Annex C. LLDC sent PDF copies via the What Do They Know email address that was provided and were not involved in producing HTML versions.

3. Panel Recommendations:

- 3.1. The internal review panel has received blank templates of the Contract for Hire of Venue and the Hire of Venue terms and conditions and recommends that these are provided to the requestor so that they can review these against Annex B and C that were sent with the original response. These are attached at Appendix 3 and 4.
- 3.2. The internal review panel has received blank template of the updated booking form and recommends that this is provided to the requestor so that they can review this against Annex A that was sent with the original response. This is attached at Appendix 5.
- 3.3. The internal review panel also recommend that GLL are asked to use a new blank template for each new agreement to prevent any potential deterioration of quality that could impact on the legibility for example from photocopying the documents.

If you are not content with the outcome of the internal review, you may appeal directly to the Information Commissioner at the address given below. You should do this within two months of our final decision. There is no charge for making an appeal.

Further information on the Freedom of Information Act 2000 is available from the Information Commissioner's Office:

Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Telephone 08456 30 60 60 or 01625 54 57 45

Website www.ico.gov.uk

Yours sincerely



Deputy Chief executive
London Legacy Development Corporation

- Appendix 1: 16115 response and 4 annexes sent on 9 November 2016
- Appendix 2: Comparison of screen shots of the Download PDF and HTML versions on the What do they know website
- Appendix 3: Blank GLL Contract for Hire of Venue
- Appendix 4: Blank GLL Hire of Venue terms and conditions
- Appendix 5: Blank GLL booking form