

Level 10
1 Stratford Place
Montfichet Road
London
E20 1EJ



5 April 2017

INFORMATION REQUEST REFERENCE 16139

Dear 

Thank you for your information request, received on 3 January 2017. You asked E20 and the London Legacy Development Corporation (Legacy Corporation) to provide the following information under the Freedom of Information Act 2000 (FOIA):

"Please can you confirm the following:

- 1. The number of stewards currently contracted to provide services at the London Stadium as of 03/01/2017*
- 2. A breakdown of the numbers of stewards with a level 2 stewarding qualification and those who currently do not as identified in the Guide to Safety at Sports Ground (Green Guide) Page 40*
- 3. The number of people identified in response to point 1 who are currently SIA (Security Industry Authority) qualified as of 03/01/2017*
- 4. The number of people identified in response to point 1 who currently do not hold an SIA qualification as of 03/01/2017*
- 5. Please confirm how many supervisors hold a level 3 spectator safety qualification and how many currently do not as of 03/01/2017*
- 6. Please provide me with a copy of any code of conduct for stewards that has been created for those working at the London Stadium to comply with (a copy of the template containing no individuals personal details)"*

I can confirm that information relevant to your request is held by London Stadium185 (LS185) on behalf of E20. Our response follows your order:

- 1. The number of stewards currently contracted to provide services at the London Stadium as of 03/01/2017.*

There are 949 people on the database who are available to work at London Stadium. Of these, 426 have worked at London Stadium between 1st June 2016 and 31st October 2016.

Please note: OCS provide the stewards for the Stadium. The numbers only capture those who have had a shift at London Stadium (i.e. not the 523 who are available but haven't worked) and are for OCS staff only.

2. *A breakdown of the numbers of stewards with a level 2 stewarding qualification and those who currently do not as identified in the Guide to Safety at Sports Ground (Green Guide) Page 40.*

193 stewards have a NVQ level 2 and 71 are working towards the NVQ.

3. *The number of people identified in response to point 1 who are currently SIA (Security Industry Authority) qualified as of 03/01/2017.*

131 stewards have a SIA licence.

4. *The number of people identified in response to point 1 who currently do not hold an SIA qualification as of 03/01/2017.*

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5. *Please confirm how many supervisors hold a level 3 spectator safety qualification and how many currently do not as of 03/01/2017.*

31 supervisors and level managers have a NVQ level 3.

With regard to question 6, please find attached the 2016/2017 Stewards Handbook. The code of conduct is section 11. Please be advised that some information has been redacted from this handbook. A schedule of the redactions is below, followed by the explanations for the redactions:

Page	Exemption		
2	s.40(2)	Personal information	Names
3	s.40(2)	Personal information	Name
4	s.31(1)(a)	Prevention of crime	Photos of key personnel
4	s.40(2)	Personal information	Photos of key personnel
7	s.31(1)(a)	Prevention of crime	Key locations within the Stadium, and identified on the Plan
9	s.40(2)	Personal information	Images of stewards
10	s.31(1)(a)	Prevention of crime	Security procedures
12	s.31(1)(a)	Prevention of crime	Coded messages
12	s.31(1)(a)	Prevention of crime	Emergency codes
13	s.31(1)(a)	Prevention of crime	Security codes
14	s.31(1)(a)	Prevention of crime	Security procedures
19	s.31(1)(a)	Prevention of crime	Call signs
20	s.40(2)	Personal information	Name
21	s.40(2)	Personal information	Personnel photos
22	s.31(1)(a)	Prevention of crime	Security procedures
23	s.31(1)(a)	Prevention of crime	Security procedures
24	s.40(2)	Personal information	Personnel photos

S.31 - Law enforcement.

(1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice—

(a) the prevention or detection of crime

The section 31 exemption is a qualified exemption and subject to the prejudice test and the public interest test. Under the prejudice test we have to consider if disclosure of this information would, or would be likely to, prejudice the prevention of crime. Consideration is also given to the harm disclosing this information would be likely to cause, combined with other information already in the public domain (mosaic effect) or possibly released at a future date (precedent effect). The public interest test considers and balances the public interest in disclosing this information against the public interest in not disclosing this information and uses this assessment to decide whether there is sufficient justification in withholding this information under this exemption.

Information disclosed under the FOIA is considered to be public information, and while there is a presumption towards disclosure, consideration needs to be given as to who will have access to this information beyond the requestor, and the purposes for which they could use the information.

The Legacy Corporation have assessed the impact of releasing the information redacted under s.31(1)(a), identified above, and consider that the public interest would not benefit from this information being released into the public domain. The security of the Stadium would be jeopardised, and the prevention of crime would be likely to be prejudiced. It is the view of the Legacy Corporation that the public interest in withholding the information outweighs the public interest in disclosing it.

Section 40(2) – personal information

(2) Any information to which a request for information relates is also exempt information if—

(a) it constitutes personal data which do not fall within subsection (1), and

(b) either the first or the second condition below is satisfied.

It is the standard practice of the Legacy Corporation to redact personal information unless consent to release the information has been received.

The section 40 exemption is absolute and is not subject to the public interest test.

In this instance, the relevant condition that applies is section 40(2) whereby the information is defined as personal data within Section 1(1)(a) of the Data Protection Act 1998. The redacted information is photos of the key personnel, as well as images of a few stewards. As we have not received consent of the data subject, release of the requested information at this time would contravene the first data principle under Schedule 2(1) of the Data Protection Act 1998.

If you are unhappy with our response to your request and wish to make a complaint or request a review of our decision, you should write to:

Director
E20 Stadium LLP
Level 10
1 Stratford Place
Montfichet Road
London
E20 1EJ

Please note: complaints and requests for internal review received more than two months after the initial response will not be handled.

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



FOI / EIR Co-ordinator
London Legacy Development Corporation