



27 February 2018

INFORMATION REQUEST REFERENCE 18-006

Dear 

Thank you for your information request, received on 26 January 2018. You asked the London Legacy Development Corporation (Legacy Corporation) to provide the following information under the Freedom of Information Act 2000 (FOIA):

“Job Description – FOI/ DPA/ Information Governance team

Please would you provide the below information for the roles of anyone who processes/ manages/ deals/ advises/ consults (or partly along with their other duties) for:

- a. Subject Access requests and Information Sharing requests (or equivalent role) and;*
- b. Freedom of Information/ EIR requests (or equivalent role)*

I would like to request the following information:

- 1. Job Description of each member of the team from Head of Service (or equivalent) to admin support (or equivalent)*
- 2. Personal specification for each member of the team from Head of Service to admin support*
- 3. Make up of team i.e. 1 FTE x head of service, 1 FTE x manager, 3 FTE x officers, 2 PT x admin assistants etc.*
- 4. Pay grade/ salary band for each member of the team from Head of Service to admin support*
- 5. Date when Job Description was last evaluated*
- 6. Please provide statistics for how many requests for both FOI/EIR and Subject Access and Information Sharing received/ responded to by your organisation over the last 3 years (2015, 2016, 2017 for calendar years or 2014/15, 2015/16 and 2016/17 for financial – please provide whatever information can be easily retrieved)*
- 7. Could you confirm or explain if the responses to the requests for FOI, EIR, Subject Access and Information Sharing, are subject to any further checks/ sign off from anyone not mentioned within the team i.e. beyond the Head of Service. Could you explain who does this and for what type of requests i.e. Head of Communications for Media related requests etc. “*

I can confirm that the Legacy Corporation holds information relevant to your request. Our response follows your order:

Please note all the staff mentioned below have responsibilities beyond those you have requested and we do not have one team dedicated in part or in whole to managing FOI/DPA/Information Governance.

The Senior Information Manager is the Data Protection Officer for the Legacy Corporation and has the main responsibility for all data protection issues, including any subject access requests.

The Information Manager has the main responsibility for all aspects of the FOI/EIR process.

All Legacy Corporation staff are considered to have responsibility for freedom of information and data protection, however, for the Information Manager, leave cover and assistance is provided by the Head of Service, Secretariat and Governance Support Officer and Programme Assurance Executive where required.

While both roles are within the Finance, Commercial and Corporate Services Directorate (FC&CS), they have different reporting lines – an organisation chart for FC&CS has been attached in **Annex A** to provide clarification of the roles and reporting structure.

The Security Control room has the main responsibility for Subject Access requests and Information Sharing Requests that request CCTV footage. The Security Control room is operated on behalf of the Legacy Corporation by Engie as part of the Facilities Management contract.

In relation to job descriptions, people specifications and structure of the security team, the Legacy Corporation does hold this information for Engie staff within the Security Control room however this information is being withheld under FOIA section 31 – Law Enforcement.

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 requested where it relates to the security staff within the Park control room and believe that the public interest would not benefit from this information being released into the public domain. The security of the Park would be jeopardised, and the prevention of crime would 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.

Q1. Job Description of each member of the team from Head of Service (or equivalent) to admin support (or equivalent)

Q2. Personal specification for each member of the team from Head of Service to admin support

The Legacy Corporation role profiles include the job description. These have been attached for each role:

Annex B: Director of Governance, Assurance and Programme Management (Head of Service)

Annex C: Senior Information Manager

Annex D: Information Manager

Annex E: Secretariat and Governance Support Officer

Annex F: Programme Assurance Executive

Q3. Make up of team i.e. 1 FTE x head of service, 1 FTE x manager, 3 FTE x officers, 2 PT x admin assistants etc.

1 FTE x Head of Service
1 FTE x Senior Manager
1 FTE x Manager
1 FTE x Officer
1 FTE x Executive

Q4. Pay grade/ salary band for each member of the team from Head of Service to admin support

Level	Band	Salary band
Head of Service	8	£97,286 - £118,905
Senior Manager	5	£46,217 - £56,487
Manager	4	£39,277 - £48,005
Officer	2	£30,290 - £37,021
Executive	1	£24,901 - £28,830

Q5. Date when Job Description was last evaluated

Level	Last review date
Head of Service	November 2017
Senior Manager	January 2014
Manager	January 2014
Officer	January 2014
Executive	January 2014

Q6. Please provide statistics for how many requests for both FOI/EIR and Subject Access and Information Sharing received/ responded to by your organisation over the last 3 years (2015, 2016, 2017 for calendar years or 2014/15, 2015/16 and 2016/17 for financial – please provide whatever information can be easily retrieved)

FOI/EIR Requests:

Financial Year	Number of requests received/responded to
2014/15	68
2015/16	75
2016/17	123

Subject Access Requests:

Financial Year	Number of requests received/responded to
2014/15	1
2015/16	1
2016/17	1

Information Sharing Requests:

Financial Year	Number of requests received/responded to
2014/15	52
2015/16	37
2016/17	54

Q7. Could you confirm or explain if the responses to the requests for FOI, EIR, Subject Access and Information Sharing, are subject to any further checks/ sign off from anyone not mentioned within the team i.e. beyond the Head of Service. Could you explain who does this and for what type of requests i.e. Head of Communications for Media related requests etc.

FOI/EIR requests:

For each FOI/EIR, all requests received are copied to the Communication, Marketing and Strategy Directorate.

At the end of the process, each request is approved for release by the relevant Executive Director who has responsibility for the area(s) covered by the request.

Each week a report of all active FOI/EIRs is sent to the Greater London Authority (GLA) as our parent body and they may request to see a draft response.

Subject Access requests:

The process depends on the complexity of the request – a request for CCTV footage by an individual would require a different process to a request relating to email references.

For subject access requests and information sharing requests received for CCTV footage, no action is taken until a data form is completed, including the reason for the request and verification of the identity of the individual. The data request is only provided in person, not sent by post or email.

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:

Deputy Chief Executive and
Executive Director of Financial, Commercial and Corporate Services
London Legacy Development Corporation
Level 10
1 Stratford Place
Montfichet Road
London
E20 1EJ

Email: FOI@londonlegacy.co.uk

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