

Level 10  
1 Stratford Place  
Montfichet Road  
London  
E20 1EJ



10 May 2018

**INFORMATION REQUEST REFERENCE 18-021**

Dear 

Thank you for your information request, received on 22 March 2018. You asked the London Legacy Development Corporation (Legacy Corporation) and E20 Stadium LLP (E20) to provide the following information under the Freedom of Information Act 2000 (FOIA)/Environmental Information Regulations 2004 (EIR):

*“Could you confirm a numerical number of stewards for each West Ham home game this season from September 2017 to March 2018*

*This request is being made to both the LLDC and E20 depending who holds the information.*

*Please also provide the financial cost of stewarding for each match alongside the number of stewards broken down by match”*

I can confirm that the Legacy Corporation and E20 holds information relevant to your request.

The number of stewards for each home game from September 2017 to March 2018 is in the table below:

<b>Date</b>	<b>Match</b>	<b>Steward numbers</b>
11 September 2017	Huddersfield	960
19 September 2017	Bolton	948

23 September 2017	Tottenham	1,037
30 September 2017	Swansea	975
20 October 2017	Brighton	944
4 November 2017	Liverpool	968
24 November 2017	Leicester	975
9 December 2017	Chelsea	971
13 December 2017	Arsenal	972
23 December 2017	Newcastle	977
2 January 2018	West Bromwich Albion	948
20 January 2018	Bournemouth	1,021
30 January 2018	Crystal Palace	1,024
10 February 2018	Watford	1,019
10 March 2018	Burnley	962

Please be advised that the financial cost of stewarding for each match is being withheld under FOIA section 43(2) – commercial interests.

S.43(2) - Commercial interests.

*(2) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).*

The section 43(2) 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 our commercial interests or the commercial interests of a third party.

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 and E20 have assessed the impact of releasing the financial cost of stewarding. There is, of course, a public interest in promoting transparency of the decisions and accountability, however, the Stadium needs to be able to successfully operate in a small, strong and very competitive market. The financial costs of the stewarding, if disclosed, would be likely to put the Stadium at a competitive disadvantage within this market by allowing competitors of the Stadium, who are not subject to the same legislation, to gain access to commercially valuable information which would give them a better understanding

of the Stadium costs and which they could then use to undercut the Stadium and undermine the Stadium negotiation position as a competitive venue.

It is the view of the Legacy Corporation, E20 and the stadium operator, that the disclosure of this financial information would prejudice the commercial interests of the Stadium because it will reveal detail of financial information which would be likely impact on current and future negotiations for use of the Stadium, which in turn would harm E20 and the Legacy Corporation's ability to achieve best value for the public purse, therefore at this time, the public interest in withholding the information outweighs the public interest in disclosing it.

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  
London Legacy Development Corporation  
Level 10  
1 Stratford Place  
Montfichet Road  
London  
E20 1EJ

Email: [FOI@londonlegacy.co.uk](mailto: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](http://www.ico.gov.uk)

Yours sincerely

FOI / EIR Co-ordinator  
London Legacy Development Corporation