

Information Compliance Policy

Document Control

Organisation	London Legacy Development Corporation
Date	07 October 2021
Purpose of issue	Information
Title	Information Compliance Policy
Description	Describes how the Legacy Corporation will ensure compliance with the legal, regulatory and policy frameworks which assure the security, accessibility, transparency and standards of the information resources of the organisation
Location	http://intranet.londonlegacy.private/documents/information-compliance-policy O:\Departments\Finance Corporate Services\Compliance\Policies\Information Compliance\2019\Information Compliance Policy v2.9.docx
Author	Danny Budzak
Contributors	
Distribution	All staff
Status	For information
Version	v2.15
Protective marking	Not Protectively Marked

Version Control

Version	Date	Description	Author
v2.6	May 2019	This is the annual review of the policy	Danny Budzak
v2.7	May 2020	This is the annual review of the policy	Danny Budzak
v2.11	24 August 2020	Amendments and policy re-published	DB
v2.12	01 July 2021	Annual review	DB
v2.15	10 Sep 2021	Minor revisions & formatting	JW

1 Information Compliance Policy

1.1 Introduction

This policy describes how the London Legacy Development Corporation (the Legacy Corporation) will ensure that it is compliant with the relevant laws, regulations and policies for the management and governance of data and information.

Information is a key asset of the Legacy Corporation. It is essential for decision making, financial management, project delivery and the management of people. The information and data which is processed – that is, created, collected, shared, stored, retained and disposed of by the Legacy Corporation needs to be managed within a governance framework to ensure legal and regulatory compliance.

The compliance framework is designed to protect information and therefore protect people, buildings, technologies, financial and other assets. The compliance framework supports the rights of data subjects.

1.2 Legal and Regulatory Framework

The legal and regulatory framework includes:

Computer Misuse Act 1990	Data Protection Act 2018
Copyright, Design and Patents Act 1998	General Data Protection Regulation 2016 (UK GDPR)
Equality Act 2010	Freedom of Information Act 2000
Environmental Information Regulations 2004	Public Records Act 2005
Privacy and Electronic Communications (EC Directive) Regulations 2003	

1.3 Legacy Corporation Policy Framework

The Legacy Corporation framework of policies and standards includes:

Acceptable Use of IT Policy	Information Compliance Policy
Bring Your Own Device Policy	Information Management Policy
CCTV Policy, 1 Stratford Place	Record Retention and Disposal Policy
Document Control Standards for Conject	Code of Conduct Policy
	Terms and Conditions of Service

1.4 Purpose

The purpose of this policy is to describe how the Legacy Corporation will manage its information and data to ensure compliance with the legal, regulatory and policy framework.

This is to ensure the management and mitigation of risk in relation to data loss, theft and corruption, financial loss and damage to people, assets and reputation.

1.5 Scope

The scope of this policy applies to all the data and information of the Legacy Corporation and all equipment, networks and systems and all users of these.

1.6 Review of Policy

This policy will be reviewed on an annual basis. The review history is described in the document control table at the beginning of the document.

2 Computer Misuse Act 1990

2.1 Overview

The Computer Misuse Act is designed to help reduce risk created by cybercrime. As well as covering any external threats to the Legacy Corporation, members of staff could be guilty of offences under the act if they attempted to access equipment or accounts or software which they did not have authorisation to do so. Offences under the act include, but are not limited to:

Hacking – accessing a computer, network or system without authorisation or permission. Any attempts to access, tamper with, remove or change data in a system without authorisation

Using Equipment to Commit a Criminal Offence – including fraud, denial of service attacks, accessing and sharing obscene material, incitement to racial and religious hatred, defamation, terrorism, downloading and sharing copyright protected material

3 Copyright, Designs and Patents Act, 1988

3.1 Data and Information

- Data and information and any designs or software which is created on behalf of the Legacy Corporation is the property of the Legacy Corporation
- Data and information created by third parties on behalf of the Legacy Corporation is the copyright of the Legacy Corporation
- Data and information created by the Olympic Delivery Authority, and held by the Legacy Corporation, remains Crown Copyright

3.2 Software and Software Licences

- The Legacy Corporation will ensure that it has the appropriate licences for the number of software applications it uses including desktop software and end user licences
- The Legacy Corporation will regularly audit its software estate to ensure that all of the instances of the software have the appropriate licences
- The Legacy Corporation will ensure that where it has licence agreements with providers of systems (for example, Oracle, eDays, Conject), the terms and conditions of these licences will be adhered to

3.3 Geographical Information

- The Legacy Corporation is provided with GIS software through an agreement with the Greater London Authority and ESRI who supply ArcGIS
- Geographical information is licensed where necessary through the Public Sector Mapping Agreement of which the Legacy Corporation is a member
- Geographical information which is created by the Legacy Corporation will be the property of the Legacy Corporation

3.4 Use of Images and Content

- All staff will be made aware of the need to validate the provenance of photographs, images, designs before they are used or reproduced – for example in brochures, reports and on social media
- Where there is a requirement to use images or content from a third party, the Legacy Corporation will ensure that it seeks permission, and maintains a record of that permission

3.5 Open Government Licence

The Legacy Corporation will consider the publication of data sets under the terms of the Open Government Licence, to websites such as the London data store at <http://data.london.gov.uk/>.

This will be done on a case by case basis.

3.6 Granting of Copyright Use to Third Parties

- The Legacy Corporation will permit the use and re-use of information under the terms of the Open Government Licence where appropriate
- Where content created by the Legacy Corporation is used or re-used, the Legacy Corporation will request that the source of the material is identified, and the Legacy Corporation's copyright is acknowledged

3.7 Use of Logos and Branding

- The Legacy Corporation will clearly define for third parties design conditions and terms of the use of logo and branding. This is set out in the brand guidelines produced by Communications, Marketing and Strategy

3.8 Use of Third Party Materials

- Where third party material is used this material will be given a clear reference and citation.

4 Data Protection

4.1 Introduction

Data Protection is managed in compliance with the Data Protection Act 2018 and the General Data Protection Regulation UK-GDPR.

4.2 Principles

The six principles of data protection are set out by the Information Commissioner's Office here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/>

4.3 Data Protection Policy Statement

The Legacy Corporation will ensure that the processing of personal data and special category data complies with data protection legislation. This includes:

- Personal data and special category data will only be processed where there is a lawful basis
- Privacy Notices will be completed where personal data is processed
- Data Privacy Impact Assessments will be completed where necessary
- Legitimate Interest Assessments will be completed where necessary
- Consent will be managed where consent is the lawful basis of processing

- Data Sharing Agreements will be completed and agreed where necessary with third parties
- A Record of Processing Activities will be maintained
- Access to personal data and special category data will be controlled and limited to authorised members of staff
- Data protection will form part of the IT&IS risk management framework
- A data breach reporting process will be maintained
- All staff and all contractors, consultants and third parties who have access to the Legacy Corporation network will receive information security training which will include data protection training

4.4 Legacy Corporation Commitment

The Legacy Corporation will ensure the processing of personal data is:

- Carried out only when there is a lawful basis for the processing
- Only for specific purposes which are outlined in the relevant privacy notice
- Relevant and proportionate
- Retained for only as long as it is required
- Kept secure and that systems are up to date with security requirements
- Only carried out by staff who have received the relevant training
- Only accessible to authorised staff
- Supported by the relevant governance framework as outlined in Section 4.5 below

4.5 Governance Framework

The Legacy Corporation will ensure it has a governance framework which ensures compliance with data protection. This includes:

- The completion of Data Privacy Impact Assessments where necessary
- The completion of a Legitimate Interest Assessment where necessary
- A set of policies – including this Information Compliance Policy
- Documented processes and procedures for data breach reporting
- An annual information governance report presented to EMT and the Audit Committee
- The maintenance of an information security risk register
- Regular training for staff and awareness raising

4.6 Rights of Data Subjects

The Legacy Corporation will ensure it has processes to support the rights of data subjects. This will include:

The Legacy Corporation will support the rights of data subjects as outlined by the legislation and the Information Commissioner's Office. These rights are:

- The right to be informed
- The right of access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

4.7 Consent

Where consent is used as the lawful basis of processing, the Legacy Corporation will:

- Ensure the consent process is clear and easy to understand
- Use a process of opt-in and not opt-out
- Maintain a record of the consent

4.8 Data Collection

The Legacy Corporation will collect personal data and special category data through paper forms, online forms, self-service applications, website cookies, wifi usage and so on.

4.9 Legitimate Interest Assessments

A Legitimate Interest Assessment will be completed where appropriate.

4.10 Data Privacy Impact Assessments

A Data Privacy Impact Assessment will be completed where appropriate.

4.11 Privacy Notices

Privacy Notices will be completed where personal data is being processed. Privacy Notices will describe the purpose of processing, lawful basis, rights of the data subjects, contact details and so on.

Where Privacy Notices are for the public and young people, they will be clearly written for those audiences.

4.12 Monitoring of Data Protection

The Legacy Corporation will maintain a Record of Processing Activity.

The IT&IS Team discuss information security on a weekly basis. Data protection and information security are discussed at the weekly meeting between the Director of IT and the Senior Information Manager, who is also the Data Protection Officer

4.13 Compliance Notification of Data Breaches

Any breaches of GDPR will be recorded on the Information Security Risk register and a security incident form will be completed. Where necessary, a copy of this form will be sent to the ICO within 72 hours.

4.14 Roles and Responsibilities

All staff have a responsibility to ensure personal data held by the Legacy Corporation is appropriately managed. In addition the roles listed below have specific tasks.

Executive Management Team - overall responsibility for ensuring the Legacy Corporation complies with its legal obligations

Senior Information Risk Owner (SIRO)

- The SIRO is the Deputy Chief Executive
- Oversight of implementation of appropriate controls to manage and mitigate personal data risks

Data Protection Officer (DPO)

- The DPO is the Senior Information Manager
- Designated Data Controller for the Legacy Corporation

- Briefing the SIRO on data protection responsibilities
- Reviewing and maintaining the relevant policies
- Advising business teams on Data Protection issues
- Ensuring that data protection induction and training takes place
- Ensuring the relevant and necessary governance is in place and maintained
- Responding to Subject Access Requests
- Keeping up to date with the work of the ICO, with legislative changes, penalty notices and so on

Information Manager

- Managing FOI / EIR requests
- Management of paper records

All Staff

- Must inform the DPO if they are processing personal data
- Must inform the DPO if they receive a request for personal data which will be treated as a Subject Access Request by default
- Receive an overview of data protection as part of information security induction
- Demonstrate an understanding and awareness of data protection issues
- Follow policies and procedures for managing personal data
- Inform Information Services of any database or dataset which includes personal or sensitive personal data
- Immediately highlight any breaches, or suspected breaches to their line manager, to the Data Protection Officer or the Senior Information Risk Officer
- Understand that breaches of this policy could result in disciplinary action or criminal proceedings or both
- Be aware that breaches of this policy may result in undertakings, or fines, or both from the Information Commissioner's Office (ICO)

4.15 Monitoring of this Policy

The Senior Information Risk Owner will oversee the operation of this policy and associated procedures on behalf of the Executive Management Team. This policy is reviewed on an annual basis.

4.16 Data Subject Rights

Responding to Subject Access Requests under the Data Protection Act

Subject Access Requests should normally be in writing. This can include email. If this is not possible a reasonable adjustment will be made. If a request is received from an individual about information the Legacy Corporation may hold about them it must be passed to the Senior Information Manager without delay.

Verifying Identity

Where the individual making a subject access request is not known to the Information Manager their identity must be verified before handing over any information. Some examples of verification documentation include:

- Requesting sight of photographic ID (passport or driver's licence) or a certified copy of these documents
- Receiving a witnessed signature
- Checking postal address with the electoral register

Responding to Requests

Information must be provided to the requestor within one month. The requested information will be provided in either paper or electronic format unless the applicant makes a specific request to be given supervised access in person.

Where face-to-face requests are made, the Senior Information Manager will make the information available to the applicant on Legacy Corporation premises, but they must be supervised at all times. Identity verification must take place before the individual is allowed access to the information.

Personal Data of Staff

All staff will be informed that their personal data is being processed for HR purposes at the point of signing an employment contract, consultancy contract or any other terms and conditions for work activities with the Legacy Corporation. This is supported by the Staff Privacy Notice.

4.17 Direct Marketing

The Legacy Corporation and its agents will not carry out direct marketing of individuals whose personal data it holds without the consent of the data subject.

4.18 Notification

The Legacy Corporation is currently a Tier 1 organisation, as defined by the Information Commissioner's Office. The Corporation's registration number is Z3138681.

4.19 Security Controls

The security of the Legacy Corporation's personal data is paramount and appropriate security controls are enforced to safeguard this information. These security controls include:

- Firewalls and anti-virus software to protect the IT network
- User authentication and passwords to log on to PCs
- Folders restricted by permissions
- Password protected applications and spreadsheets
- There are different levels of access permissions – for example, user, super-user, system administrator
- Off-site storage for paper records will only be used where there exists relevant security accreditation
- Physical security in terms of lockable cupboards, pedestals and so on

4.20 Staff Awareness and Training

All staff are required to attend a mandatory information security training session as part of their induction. Guidance on handling personal data is also provided to staff via the corporate intranet.

All staff, contractors, consultants, interns – anyone with access to the LLDC network – receive information security training on an annual basis as a minimum. In addition, staff working on particular projects may receive additional training which is project specific.

Awareness is raised through the fortnightly IT&IS bulletin, all staff meetings, directorate meetings and the intranet.

4.21 Data Sharing Agreements

Data Sharing Agreements may be created where there are specific requirements to share data between the Legacy Corporation and third parties.

5 Equality Act 2010

5.1 Accessible Information and Data

The Legacy Corporation will ensure that people have access to information which they can understand and support which they might require including British Sign Language (BSL) interpreter, deaf blind manual interpreter or an advocate.

The Legacy Corporation will ensure that information can be provided in a range of formats, including audio, Braille, alternate tactile formats, Digital Accessible Information System (DAISY) large print, easy to read.

The Legacy Corporation will ensure that its websites and associated sites will be compliant and aligned with the relevant standards for web accessibility such as:

- Web Content Accessibility Guidelines (WCAG) as defined by the World Wide Web Consortium (W3G)
- The A and AA standards for content accessibility

The Legacy Corporation will ask people if they have any information or communications needs and work to meet these needs. These needs will be recorded in a standard way.

The Legacy Corporation will also ensure that:

- Web links are accessible to screen readers
- Application forms (for services, application forms) are accessible
- Core information is accessible
- Websites are accessible to disabled people
- Text size can be altered by the user

6 Freedom of Information and Environmental Information Regulations Policy

6.1 Introduction

The Freedom of Information Act (FOIA) 2000 gives the public a right to request information from public bodies.

The Environmental Information Regulations (EIR) implements a European Union Directive on public access to environmental information. Both pieces of legislation require public bodies to provide information through an approved publication scheme and to respond to requests for information within a certain number of working days.

This legislation imposes the following duty:

- To confirm or deny that the information requested is held
- If the information is held, to communicate it to the applicant

Public authorities also have a duty to provide reasonable advice and assistance to requestors.

The Information Commissioner's Office (ICO) is the independent regulatory authority for legislative requirements. It is the appeal body for requests that have not been resolved to the requestor's satisfaction. The ICO has the right to impose fines and to issue public decision notices to organisations which have been found to be non-compliant with the legislation. The ICO has extensive guidance about freedom of information at

<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/>

The Legacy Corporation is defined as a public authority for the both the FOIA and EIR.

6.2 Purpose

This section of the policy defines the Legacy Corporation's policy and procedures for handling requests for information under the Freedom of Information Act and the Environmental Information Regulations. This includes:

- The duties imposed by the Act and the Regulations and how the Corporation intends to discharge those duties
- Responsibilities for ensuring compliance
- Complaints and appeals process
- The role of the Information Commissioner's Office

In most areas, the procedures for EIR are the same as FOI. For brevity, this policy will refer primarily to FOI, but where differences exist, these will be highlighted.

6.3 Roles and Responsibilities

6.3.1 Executive Management Team

The Executive Management Team (EMT) has overall responsibility for Freedom of Information for the Corporation.

6.3.2 Executive Directors

The Executive Director who is the information asset owner of the information requested is responsible for authorising if that information can be released under FOI and EIR.

6.3.3 Qualified Person

The Qualified Person for determining whether disclosure would be likely to prejudice the effective conduct of public affairs is the Chair, who has the final say on disclosure if required under section 36 of FOI.

6.3.4 FOI Co-ordinator

Operational responsibility for FOI and EIR is delegated to the Legacy Corporation's Information Manager who is, for the purposes of this policy, the FOI Coordinator. They are responsible for managing all of the requests, providing advice on FOI & EIR, producing regular reports for the Executive Management Team and maintaining the Publication Scheme.

6.3.5 All Staff

All staff are responsible for immediately forwarding public requests for information, that are deemed to be requests made under the FOIA or EIR, to the FOI Coordinator as soon as they have been received.

All staff members are responsible for ensuring requests for information are dealt with in accordance with this policy, and for supplying any information held that has been requested, within the timescale agreed and published by the Legacy Corporation.

When a request for information is made, all staff are under a legal obligation not to alter, deface, erase, destroy or conceal any of that information with the intention of preventing its disclosure. Any such actions constitute a criminal offence.

6.4 Publication Scheme

The Legacy Corporation will maintain a Publication Scheme, listing the classes of information and the documents that it routinely publishes or intends to publish. The Publication Scheme will be

published on the Legacy Corporation's website. The Scheme will be reviewed on a regular basis, following the latest advice from the Information Commissioner's Office.

There will be no charge for information listed on the Legacy Corporation's Publication Scheme unless indicated.

6.5 Receiving Requests

Any member of the public or any organisation may make a request for information held by or on behalf of the Legacy Corporation. The requestor does not need to identify themselves, only provide an address, either postal or email, to enable the Legacy Corporation to respond and provide the information.

- Freedom of Information requests need to be made in writing
- Environmental Information Regulations requests do not have to be made in writing

For both FOI and EIR, the requestor does not need to refer to the legislation for their request to be handled in accordance with them.

Where EIR requests are made verbally, the staff member receiving the request will write down the request and relay it back to the requestor for confirmation. This is to ensure that both parties are clear about what information is being requested. Contact details for the response will also be agreed at this stage.

Upon receipt of request, the FOI Coordinator will acknowledge receipt to the requestor and fill in a notification template to inform the relevant Executive Director and other staff who will seek to assist in responding to the request.

If clarification of the request is required, this will be sought by the FOI Coordinator, in writing.

All FOI and EIR requests will be logged and tracked by the FOI Coordinator. This will aid management of the request and help with the identification of repeat, similar or vexatious requests.

Vexatious request are defined as repeated or substantially similar requests received from the same person or organisation within a period of 60 working days. Requests deemed vexatious will not be processed and will be refused.

6.6 Responding to Requests

Where necessary, the FOI Coordinator will seek clarification on the exact nature of the request. This will help to ensure that the response is relevant to what the requestor is asking and will help to ensure that the process is completed effectively.

The Legacy Corporation will respond promptly to requests for information and in any case within the statutory maximum of twenty working days. In some cases, the time limit for requests can be extended to forty working days if complexity or volume means it is impracticable to respond within twenty working days. Where this is the case, the requestor must be informed that this is the case within the initial twenty working days.

A working day is considered to be Monday to Friday, excluding UK Bank Holidays.

Where there is reason to believe that some or all of the information requested is held by another public body, the Legacy Corporation will contact the applicant and provide information about where to re-direct the request.

The Legacy Corporation maintains a Records Retention and Disposal schedule. Where records scheduled for disposal are known to be the subject of a request for information, the destruction will be delayed until all relevant complaint and appeal provisions have been exhausted.

6.7 Releasing Information

The information must be supplied to the requestor unless it is subject to one of the FOI exemptions or EIR exceptions. The Legacy Corporation will consider the public interest test when the relevant exemption is engaged.

In most cases, information will be supplied electronically unless the requestor specifically asks for a paper copy. A paper copy will be provided if it is practical to do so.

The FOIA has 24 exemptions. Seven are designated 'absolute', meaning that if an absolute exemption applies there is no further need to consider the request. The others are known as 'qualified' exemptions and require a public interest test to be applied. This is to consider whether the public interest in withholding the information outweighs the public interest in disclosing it. This will be conveyed to the requestor in writing.

The EIR has 13 exceptions, all of which are subject to a public interest test, and must be conveyed to the requestor, with the exception of Regulation 12(3) which deals with personal data.

Under FOI and EIR the legal emphasis is always on disclosure and the balance of public interest needs to be strongly weighted against that when information is withheld. The arguments for not releasing need to be strong in order to tip the balance in favour of withholding the information from the public.

Where an exemption or exception is deemed to apply to some or all of the information requested, the requestor will be notified in writing. The relevant exemption or exception will be cited and any information that is not exempt will be provided.

Once released, all information provided to a requestor under FOI and EIR is considered to be in the public domain. Each month the responses that have been released are anonymised and published in the disclosure log within the Publication Scheme on the website with an index of all the requests received since October 2014.

<http://queenelizabetholympicpark.co.uk/our-story/the-legacy-corporation/good-governance/publication-scheme/disclosure-log>

6.8 Personal Information – Subject Access Request under the Data Protection Act

Where an applicant makes a request for their own personal data, the request will be treated as a Subject Access Request under Data Protection legislation. Staff must refer to the procedures detailed in this policy.

6.9 Third Party Information

Where a request is made for information about a third party, or disclosure may affect the interests of a third party, the third party will be informed, to help determine whether an exemption applies. However, the final decision will be made by the Legacy Corporation.

Where the Legacy Corporation does not hold the information requested, but it is believed that another public authority does, the applicant will be informed of this and provided with relevant contact details where possible.

6.10 Charging Fees

The circumstances by which fees can be charged are different for FOIA and EIR.

Where charges apply the Legacy Corporation will follow the ICO's guidance on the 'appropriate limit' and charging regime. For this the maximum appropriate cost is deemed to be £450 based on an hourly rate of £25 for 18 hours.

Requests that would exceed the appropriate limit may not be processed, therefore requests that would cost more than £450 may be refused. A refusal notice will be issued, but the requestor will also be assisted in narrowing the scope of their request to bring it under the limit where possible.

Disbursements (postage, photocopying, printing, CDs and so on) costing less than £35 will not be charged to the applicant but at or above £35 the applicant will be charged in full. Requestors will be informed about such charges in a fees notice.

Where a fee is charged, this must be paid within three months of notification of the fee during which period the twenty working day clock is stopped. It will re-start on receipt of the fees. Failure to pay will end the Legacy Corporation's obligation to comply with the request.

6.11 Complaints

The Legacy Corporation has adopted the Lord Chancellor's Code of Practice as the mechanism for dealing with complaints. Any written reply from a requestor expressing dissatisfaction with the Legacy Corporation's response to a request will be treated as a complaint whether or not the requestor has expressly stated a wish to have the decision reviewed. This includes appeals against decisions against disclosure. These complaints are described as internal reviews. The requestor has two months after receiving the original response to register a complaint.

The Executive Director of Finance and Corporate Services is responsible for overseeing complaints and appeals, this process will be supported by an internal review panel.

Where the outcome of the complaint is that procedures were not followed correctly the Legacy Corporation will apologise to the applicant, provide the relevant information and take steps to prevent such errors occurring in future.

If dissatisfied with the outcome of the review, the applicant may seek a review by the Information Commissioner's Office which has powers to uphold or overturn the decision of the original request and internal review. After reviewing the responses and information in relation to the request the Information Commissioner's Office will issue a decision notice which outlines if any further action is required on the part of the organisation.

The Legacy Corporation will abide by the decisions of the Information Commissioner's Office, unless it considers itself to have grounds for an appeal to the First- tier Tribunal (General Regulatory Chamber) - <https://www.gov.uk/courts-tribunals/first-tier-tribunal-general-regulatory-chamber>

7 Privacy & Electronic Communications (EC Directive) Regulations 2003

The Privacy and Electronic Communications Regulations (PECR) provide privacy rights in relation to electronic communications. This includes:

Marketing in the form of telephone calls, emails, texts

- Cookies (and similar technologies)
- Ensuring the security of communications services
- Ensuring customer privacy as regards traffic and location data

A full description of the use of cookies is on the Queen Elizabeth Olympic Park website at <http://queenelizabetholympicpark.co.uk/cookies>

8 Public Records Act

The Legacy Corporation is a public authority as defined by the Localism Act of 2011.

The Legacy Corporation is a non-public record body as defined by The National Archives

However, records have been transferred from the Olympic Delivery Authority, which was a public record body. Those original records are public records as defined in the London Olympic Games and Paralympic Games Act 2006. Under Schedule 1, paragraph 22.

While the records are considered to be in business use, the Legacy Corporation will ensure these records are maintained in a safe and secure environment. Once they are no longer considered to be active documents they will be returned to the Department for Culture, Media and Sport, or any successor body by either the Legacy Corporation or the bodies that have inherited the records.

9 Starters and Leavers

9.1 Starters

All starters will be given an information security induction which will include data protection, freedom of information, password protection and how to manage risks and threats such as email scams.

All new starters are required to read the Acceptable Use of IT policy and sign their agreement to comply with its terms <http://intranet.londonlegacy.private/documents/acceptable-use-it-policy>.

The signed acceptance of the Acceptable Use of IT Policy is kept with individual personnel files.

9.2 Leavers

Leavers are advised that:

- All personal emails should be removed from their Legacy Corporate mailbox
- All personal data should be removed from the H drive
- Any portable media which contain data – for example, CDs, portable hard drives, USB sticks are either handed to the line manager or to IT&IS

The leaver will be informed that the Legacy Corporation has the right, in certain circumstances, to review all the data and information on their mailbox or H drive. but will in general treat emails marked as 'personal' as personal data of that member of staff.