West Yorkshire Combined Authority | Tracy Brabin Mayor of West Yorkshire

Our Reference: 3404

29/06/2026

Freedom of Information Act 2000 Enquiry – Internal Review

Thank you for your email dated 29/05/2026 requesting an internal review of your Freedom of Information Act 2000 request, which asked:

I would like to request information relating to the operation of Leeds Bus Station (New York St, Leeds LS2 7HU) which is managed by WYCA.

Specifically, I would like to request the following information for the period 1 January 2025 to 31 December 2025:

1. The total number of recorded infringements or breaches of bus station operating rules, or conditions of use by bus or coach operators using Leeds Bus Station.

2. The number of infringements by each bus or coach operator. If providing data by operator raises any commercial sensitivity concerns, I am happy for the data to be anonymised or aggregated (for example Operator A, Operator B etc.).

3. Where available, a breakdown of the types of infringements recorded (for example operational breaches, stand misuse, timing violations, safety issues, or other categories used internally).

The information is requested purely for comparative analysis of bus station usage and compliance, and anonymised data would be sufficient. If possible, I would prefer the information in spreadsheet or table format.

Your email requesting an internal review stated the following:

We write further to your letter of 14 May 2026, and the Freedom of Information Act 2000 response dated 15 May 2026.

Second, we note that you have declined to provide operator-specific breach data on the basis of alleged commercial sensitivity. With respect, we do not agree that anonymised operator-level data would give rise to any prejudice. Indeed, your own response acknowledges the public interest in transparency. An anonymised schedule (for example, Operator A, Operator B, etc.) would allow comparative analysis without identifying the relevant operators. That approach would meet the public interest test and would assist all parties in understanding whether monitoring is being applied, and decisions made, consistently and fairly.

In accordance with the Combined Authority's internal review procedure, this matter has been reviewed in light of your request by Executive Director of Transport and Data Protection Officer

The reviewers have:

- Considered all of the correspondence;
- Discussed with the authors of the initial response to you the reasons for the response, together with their views on your request for a review; and
- Considered the legislation and relevant ICO guidance

The independent review noted that the application of Section 43(2) was correctly applied when exempting information of a commercially sensitive nature, even in a nominally structured format, risked enabling re-identification by individuals with sufficient specialist knowledge of the bus network, its operators and their respective operational characteristics. Given that Freedom of Information obligations required us to consider disclosure to world at large rather than to any particular requestor, we formed the view that combination of operational detail and relatively limited number of operators active in the network created a material risk that commercially sensitive information could be deduced from ostensibly anonymised data.

The public interest in enabling scrutiny of whether monitoring is being applied consistently and fairly across operators is weighty consideration, and however the anyonmised data disclosed below is sufficient to enable that scrutiny without exposing any operator to identifiable commercial prejudice.

Accordingly, the Combined Authority can confirm that in 2025, a total of 347 complaints were received, please see document attached for more detailed breakdown of these complaints. It should be noted that, on investigation, not all of these complaints were found to be valid or they had satisfactory explanations.

If you are not content with the outcome of this internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113/01625 545745

Website: www.ico.gov.uk

For your information, there is no charge for making an appeal.

Yours sincerely,

Information Governance Officer
freedom.info@westyorks-ca.gov.uk