



Our Reference: 2837

21/04/2026

Freedom of Information Act 2000 Enquiry – Internal Review - Weaver Network: Bus Safety Governance, Transparency & Franchising Preparation

Thank you for your email dated 21/03/2026 requesting an internal review of your Freedom of Information Act 2000 request, which asked:

“Date range covered: 1 January 2023 – present

1. Purpose of Request This request seeks information relating to bus safety governance, transparency, and preparatory work connected to the Weaver Network and wider bus reform / franchising activity. This request does not seek raw safety incident data. It seeks governance, decisionmaking, oversight, and transparency frameworks.

2. Safety Governance & Oversight Frameworks Please provide all documents held by West Yorkshire Combined Authority that set out, describe, define, or evidence: roles, responsibilities, and accountabilities for bus safety oversight; escalation and assurance arrangements for safety risks; reporting structures for safety performance; arrangements for monitoring, reviewing, and acting on safety information. This includes (but is not limited to): governance frameworks or operating models; memoranda of understanding or protocols; accountability or assurance maps; reporting or escalation diagrams; terms of reference for boards, committees, or programme groups; internal policy or guidance documents relating to bus safety or safety transparency.

3. Safety Reporting & Transparency Arrangements Please provide documents that explain: what categories of bus safety information are collected or expected to be collected; how safety performance is reviewed internally; whether safety performance data is intended to be published; how publication frequency, Wellington House, 40-50 Wellington Street, Leeds, LS1 2DE format, and accessibility are being considered; how transparency principles are being embedded within the Weaver Network.

4. Senior Decision-Maker Records For the period stated, please provide any documents submitted to or produced for: Director-level officers and above; the Chief Executive’s Office; any relevant WYCA committees, boards, programme boards, or steering groups. Where those documents refer to: bus safety governance; safety reporting or performance;



transparency or publication of safety information; risks, issues, or mitigations relating to safety; commitments made or proposed in connection with the Weaver Network.

5. Franchising & Enhanced Partnership Context Please provide documents that show: what preparatory work has been undertaken in relation to bus franchising; what analysis, modelling, or benchmarking has been carried out; how enhanced partnership arrangements are being monitored and evaluated; how success or failure of current arrangements is assessed; what comparators or bestpractice examples (e.g. other Combined Authorities or Transport for London) have been considered.

6. Stakeholder Engagement Please provide documents relating to engagement with: bus operators; trade unions; other Combined Authorities; government departments or agencies; independent advisors or consultants; where this engagement relates to: bus safety; safety governance; transparency or reporting; franchising or transition planning.

7. Public Interest & Context This request is made in the overriding public interest. Bus services under the Weaver Network are publicly funded, publicly specified, and delivered under public control. Safety governance and transparency are therefore matters of legitimate public scrutiny. There is a strong public interest in understanding: how bus safety risks are governed and escalated; whether safety performance is routinely reviewed at senior level; how lessons are learned from incidents; and whether transparency is being embedded as part of bus reform rather than deferred. Comparable authorities — most notably Transport for London — have published bus safety performance data for over a decade without harm to operators or public confidence. Several Combined Authorities are now moving toward similar transparency frameworks. West Yorkshire’s approach will therefore be closely watched as an emerging benchmark for best practice.”

Your email requesting an internal review stated the following:

While I understand the application of Section 43 to live franchising tender information, my request primarily sought information relating to bus safety governance, oversight, transparency and reporting arrangements.

These matters relate to public safety governance rather than commercially sensitive tender information. Disclosure of governance frameworks, reporting structures, or safety oversight arrangements would not prejudice competition or tendering.

In particular, I request reconsideration of the decision to withhold:

- Bus safety governance frameworks*
- Oversight structures for safety performance*



- *Reporting and escalation arrangements*
- *Safety transparency and publication considerations*
- *Governance relating to safety within bus reform planning*

These are structural governance matters rather than commercially sensitive tender content. Given the strong public interest in safety governance for publicly funded bus services, I request that this information be reconsidered for disclosure.

In accordance with the Combined Authority's internal review procedure, this matter has been reviewed in light of your request by the Director of Bus Franchising.

The reviewer has:

- 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 concludes that Section 43(2) was correctly applied to the information withheld in the original response. The review found that the majority of the material falling within scope of the request is not standalone safety documentation, but is instead embedded within the commercial, operational and governance architecture of the live Bus Franchising Programme. Disclosure of this information would be likely to prejudice the Combined Authority's commercial interests by revealing commercially sensitive programme design, internal risk frameworks, and elements of the Authority's approach to procurement, mobilisation and operator oversight.

The review also noted that several of the governance and reporting structures requested remain under development as part of the franchising transition. Premature disclosure of draft or provisional material could misrepresent the final arrangements, undermine programme integrity, and adversely affect ongoing commercial processes.

In reassessing the public interest test, the review recognised the legitimate public interest in transparency around safety governance. However, it also identified a strong public interest in ensuring that the Combined Authority can conduct a fair, competitive and undistorted franchising procurement. As the information requested is intrinsically linked to the commercial structure and delivery model of the live Bus Franchising Programme, disclosure at this stage would be likely to weaken the Combined Authority's negotiating position and reduce its ability to secure value for money.

On balance, the review concludes that the public interest in maintaining the exemption outweighs the public interest in disclosure. Information already in the public domain, such



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West Yorkshire

as Enhanced Partnership documentation, public assessment reports and committee papers, remains available. No further information can be disclosed without engaging Section 43(2).

Upon review, we conclude that the response to your request remains valid for the reasons given above and is therefore upheld.

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

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