



Our Reference: 2448

27/02/2026

Freedom of Information Request – Internal Review

Thank you for your email, which was received by the West Yorkshire Combined Authority on 30 January 2026, requesting an internal review of your Freedom of Information request.

You requested:

“ An Internal Review of West Yorkshire Combined Authority response to my Freedom of Information request (Ref: 2448), dated 13 January 2026. Specifically, I am challenging the West Yorkshire Combined Authority decision to withhold information regarding complaints, service failures, and driver vetting under Section 43(2) (Prejudice to Commercial Interests).

1. Misapplication of Section 43(2)

You have applied a blanket exemption to "all correspondence" between WYCA and Hunters Coaches. I believe this is disproportionate and legally incorrect in the context of safeguarding. While pricing schedules may be commercially sensitive, correspondence regarding safety complaints, service reliability, and driver vetting (DBS checks) is not a trade secret. The fact that a supplier has received complaints or has (or has not) completed required safety checks is a matter of statutory compliance and contract performance, not a "commercial secret" that would prejudice fair competition.

2. The Public Interest Test

Even if Section 43(2) were engaged, the public interest in disclosure overwhelmingly outweighs the interest in withholding this information.

This contract involves the transport of children that is an important child safeguarding matter. There is a paramount public interest in knowing whether the drivers entrusted with our children have undergone mandatory Disclosure and Barring Service (DBS) checks and other safety vetting.



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In terms of accountability, the public has a right to know if WYCA is effectively monitoring its contractors' compliance with legal safeguarding requirements. Withholding this information prevents public scrutiny of potential safety failures.

3. Specific Information Requested

I request that you review your decision and release the following information, redaction personal data only where strictly necessary:

- 1. Documents or correspondence confirming whether DBS checks (required by published contract between West Yorkshire Combined Authority and Hunters Coaches Ltd) and other mandatory vetting procedures have been undertaken and verified for all drivers operating on this route.*
- 2. The number and nature of complaints received regarding Hunters Coaches on this route (e.g., missed stops, driver conduct, speeding).*
- 3. Any correspondence regarding penalties, warnings, or remedial actions issued by WYCA to the operator.*

I look forward to your response within 20 working days.”

In accordance with the Combined Authority's internal review procedure, this matter has been reviewed by a panel including the Director of Transport Services 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, however, did address each of your points:

“1. Documents or correspondence confirming whether DBS checks (required by published contract between West Yorkshire Combined Authority and Hunters Coaches

Ltd) and other mandatory vetting procedures have been undertaken and verified for all drivers operating on this route”

The Combined Authority can confirm that it requires drivers who perform school bus contracts to have an enhanced DBS check. Operators are required to provide details and allow the Combined Authority to check DBS certificates to ensure compliance with the Combined Authority’s Conviction Policy.

“2. The number and nature of complaints received regarding Hunters Coaches on this route (e.g., missed stops, driver conduct, speeding).”

Upon review we can confirm that between 1st January 2023 to present, 42 complaints have been received, please see below a 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.

School/Service

Abbey Grange AG1 - 3

Abbey Grange AG7 - 10

Corpus Christi CC2 - 4

Cardinal Heenan CH21 - 1

Lawnswood L57 - 1

Mount St Mary’s MM1 - 5

Mount St Mary’s MM2 - 1

St Mary’s Menston SM26 - 3

St Mary’s Menston SM30 - 1

St Mary’s Menston SM31 - 6

St Mary’s Menston SM32 - 2

St Marys Menston SM33 - 5

Nature of complaint:

Driver attitude - 1

Child injured - 1

Early running - 6

Late running - 13

Missed bus stop - 3

Failed to operate - 2

Not accepting pre-paid ticket - 1

Not carrying 6th Formers - 1

A combination of elements of the above - 3

Vehicle capacity - 2

Followed incorrect route – 9

“3. Any correspondence regarding penalties, warnings, or remedial actions issued by WYCA to the operator.”

Upon review, the Combined Authority can confirm that 41 checks were conducted by Quality Compliance Officers, which resulted in two advisory notices being issued.

Four routine contract performance meetings have been held between the Combined Authority and the owner of Hunter Coaches.

No formal warnings, penalties or sanctions have been imposed on Hunter Coaches.

Whilst this was not specifically requested as part of your request, it should be noted that, up to 2023, Hunter Coaches had an exemplary record. However, following a change of ownership, there was an increase in the number of performance issues reported. The Combined Authority's approach has been to work with the new owners to address these issues, which has resulted in the operator's performance in the 2025/26 academic year reaching the required standard. For their part, Hunter Coaches sought external support



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from consultants during this period and have fundamentally changed their systems and processes.

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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