

**Freedom of Information Act 2000 (FOIA)
Environmental Information Regulations 2004 (EIR)**

Decision notice

Date: 12 February 2024

Public Authority: Great British Railways Transition Team
Address: Waterloo General Offices
London Waterloo Station
London SE1 8SW

Decision (including any steps ordered)

1. The Commissioner's decision is that the Great British Railways Transition Team is entitled to withhold information about the National Rail Accessibility Strategy steering group under section 36(2)(b)(i), section 36(2)(b)(ii) and section 40(2) of FOIA. These exemptions concern prejudice to the effective conduct of public affairs and personal data, respectively. No corrective steps are necessary.

Request and response

2. The Great British Railways Transition Team (GBRTT) is a legal entity within Network Rail. This means it's a public body and subject to FOIA and the EIR.
3. The complainant made the following information request to GBRTT on 15 June 2023:

"FOI request for more information on NASG:

A list of all subgroups within NASG. A list of any workstreams within the NASG (including within any subgroups): what they are, what

actions are in process within said workstreams, and any completion dates (whether past or future) for these actions. Please say what research has been or is being carried out/commissioned by the NASG.

How are decisions taken and research directions set? What are the reporting lines according to authority, and what authority does the group have to make recommendations or decisions? Please include the terms of reference for NASG, and the date when it was first established.

Non-disclosure agreements:

How many members are under non-disclosure agreements? (If possible please specify which members are under NDAs.)

Which charities or other third-party stakeholders have signed non-disclosure agreements for their engagement with NASG? (Please say which organisations specifically, and if you cannot, please indicate the type of organisation per NDA.)

NB: For all NDAs please indicate who they are with, for example if it is with Rail Delivery Group, Rail Partners, the DfT, GBRTT, or Network Rail. Please indicate this information per NDA.

In priority order, as time allows:

Please send any reports produced by the NASG since its establishment.

Please send all NASG meeting minutes since the establishment of the group. *(If there is not enough time to complete this specific request, please go as far back as possible in reverse date order)."

4. GBRTT responded to the request on 14 July 2023, handling it under both FOIA and the EIR.
5. GBRTT first confirmed what information it holds that falls within scope of the request. This comprised: meeting minutes/outputs from the group's six weekly meetings; the group's terms of reference; a single 'key findings' report which is the basis for developing a consultation on draft priorities and proposals for the Department for Transport, some draft consultation documents, papers presented to the steering group papers, and a project plan.
6. GBRTT disclosed some information – the terms of reference document – with personal data redacted under regulation 13 of the EIR.
7. GBRTT withheld the meeting minutes/outputs under section 36(2)(b)(i) and 36(2)(b)(ii) of FOIA. It withheld the key findings report and draft

consultation document under regulation 12(4)(d) of the EIR (which concerns material still in the course of completion).

8. In its internal review of 12 September 2023, GBRTT clarified that it didn't hold all the information the complainant had requested. In respect of the information it does hold, it maintained its reliance on section 36(2)(b) of FOIA to withhold the meeting minutes. It said that to the degree that any of the information in the minutes was environmental information, regulations 12(4)(d) and 12(5)(d) (confidentiality of proceedings) were engaged.
9. GBRTT confirmed that it considered it was correct to withhold the draft consultation document and key findings report under regulation 12(4)(d) of the EIR. It said that, in addition, regulation 12(5)(d) and (to the extent that they're not covered by the EIR) section 36(2)(b)(i) of FOIA also applies to these reports. GBRTT confirmed its reliance on regulation 13 to withhold personal data.
10. Finally, addressing an argument the complainant had made, GBRTT confirmed that section 19 of FOIA (which concerns publication schemes) doesn't oblige it to release the requested information.
11. In its submission to the Commissioner GBRTT has advised that a proportion of the withheld information – the consultation document – also engages section 22(1) of FOIA because it's intended for future publication.

Reasons for decision

12. This reasoning will first consider whether GBRTT was correct to consider the information it's withholding under both FOIA and the EIR.
13. The Commissioner will then consider GBRTT's reliance on section 36(2)(b), section 40(2) (the FOIA equivalent of regulation 13) and, if necessary, section 22, to withhold information within scope of the complainant's request. And if necessary, he'll consider its reliance on regulations 12(4)(d) and 12(5)(d) and on regulation 13.
14. The Commissioner will share GBRTT's separate discussion on how it interpreted the request under 'Other matters.'

Is the information environmental information?

15. In their correspondence with GBRTT the complainant had queried why it had handled their request under FOIA and the EIR and GBRTT has provided the Commissioner with its rationale in its submission.

16. Regulation 2(1) of the EIR defines environmental information as being information “on” (a) the state of elements of the environment such as air and atmosphere, (b) factors such as emissions likely to affect the elements of the environment and (c) measures such as policies, plans, programmes, and activities likely to affect the above elements and factors.
17. The focus of the complainant’s request in this case is the National Rail Accessibility Strategy Steering Group (NASG). The NASG is a cross-industry group. Its terms of reference state that its purpose is to demonstrate a “joined-up, systemwide approach to accessibility to deliver a more coherent and consistent service across the rail network, making it more accessible for all disabled passengers.”
18. The Commissioner doesn’t consider that information about this group can be said to be information that’s “on” the environment. The NASG is concerned with making sure the rail network is accessible to everyone, it’s not concerned with the effect of the rail network on the environment. That a fully accessible rail network might indirectly impact the environment – for example by reducing pollution through fewer cars being on the road – is, in the Commissioner’s view, too far removed from regulation 2(1)’s interpretation of what constitutes environmental information.
19. As such, the Commissioner will consider GBRTT’s application of FOIA to the request.

Section 36 – prejudice to the effective conduct of public affairs

20. GBRTT has applied section both section 36(2)(b)(i) and (ii) to meeting minutes and has applied section 36(2)(b)(i) to a draft consultation document and a key findings report.
21. Section 36(2)(b)(i) of FOIA says that information is exempt information if, in the reasonable opinion of a qualified person (QP), disclosing the requested information would prejudice, or would be likely to prejudice, the free and frank provision of advice.
22. Section 36(2)(b)(ii) says that information is exempt information if, in the reasonable opinion of a QP, disclosure would prejudice, or would be likely to prejudice, the free and frank exchange of views.
23. To determine, first, whether GBRTT correctly applied these exemptions, the Commissioner must consider the QP’s opinion as well as the reasoning that informed the opinion.
24. GBRTT has advised that its QP is a Minister of the Crown. It, as a public authority, doesn’t fall into any of the categories listed at section

36(5)(a)-(n) and neither GBRTT nor any of its officers/employees has been authorised to act as its qualified person.

25. However, GBRTT has confirmed that its QP was Huw Merriman, the Minister for Rail and HS2. GBRTT has provided the Commissioner with evidence that Huw Merriman gave his opinion on 22 August 2023. This was before GBRTT provided its internal review and the Commissioner is satisfied that Huw Merriman is an appropriate QP and that he gave his opinion at the appropriate time.
26. The Commissioner has considered whether the opinion about sections 36(2)(b)(i) and 36(2)(b)(ii) is reasonable. It's important to note that 'reasonableness' isn't determined by whether the Commissioner agrees with the opinion provided but whether the opinion is in accordance with reason. In other words, is it an opinion that a reasonable person could hold? This only requires that it's a reasonable opinion, and not necessarily the most reasonable opinion.
27. The test of reasonableness isn't meant to be a high hurdle and if the Commissioner accepts that the opinion is one that a reasonable person could hold, he must find that the exemption is engaged.
28. For the QP's opinion to be reasonable, it must be clear as to precisely how the inhibition may arise. In his published guidance on section 36 the Commissioner notes that it's in public authority's interests to provide him with all the evidence and arguments that led to the opinion, to show that it was reasonable. If this isn't done, then there's a greater risk that the Commissioner may find that the opinion isn't reasonable.
29. GBRTT has provided the Commissioner with a copy of its submission to the QP. In this submission GBRTT provided the QP with a copy request and the information it intended to withhold, a background to the request, arguments as to why disclosing the information would cause the prejudice in question. The QP was also asked to note the response letter it intended to send to the complainant, which included discussion of the public interest test.
30. The QP was advised that releasing the minutes would be likely to inhibit the NASG's free and frank exchange of views. This would prejudice the work of the group because its members would be inhibited in expressing themselves openly, honestly, and completely. They'd also be inhibited in exploring politically difficult or less palatable options when giving their views as part of the process of deliberation. Inhibiting the exchange of views in this way would be likely to impair the quality of decision making.

31. The QP was advised that although the information in the documents varies in terms of its sensitivity, GBRTT was applying the exemption to protect the principle that these meetings should be conducted in confidence. This accords with the Information Commissioner's guidance that "[T]he issue is whether disclosure would inhibit **the processes** of providing advice or exchanging views," and that "[T]o engage the exemption, the information requested does not necessarily have to contain views and advice that are in themselves notably free and frank," (GBRTT's emphasis).
32. Regarding the free and frank provision of advice, the QP was advised that the information in the report and the consultation document forms the basis for developing a consultation on draft priorities and proposals for the Department for Transport (DfT). The QP was advised that the capacity for the group to continue to write reports of this type with the candour and thoroughness DfT would expect would be diminished by disclosure in this instance. Lessening the quality of advice that the government receives reduces its capacity to make the best evidence-based decisions.
33. The QP made their decision on the basis that the envisioned prejudice would be likely to happen rather than would happen. The Commissioner will accept this lower level of likelihood.
34. The Commissioner is satisfied that the QP had sufficient appropriate information about the request and the two section 36(2)(b) exemptions to form an opinion on the matter of whether reliance on those exemptions was appropriate regarding the information being withheld.
35. Since he's satisfied that the relevant considerations have been addressed, he must accept that the QP's opinions about withholding the information is one a reasonable person might hold. He therefore finds that GBRTT is entitled to rely on section 36(2)(b)(i) and section 36(2)(b)(ii) to withhold the information.
36. The Commissioner will go on to consider the public interest test associated with the exemptions.

Public interest test

37. In GBRTT's submission to the QP, it's acknowledged that there's some public interest in knowing how decisions which affect the public are arrived at. Without access to this information, it's difficult for the public to be certain that these decisions have been reached fairly and appropriately. Being able to see the minutes of the NASG as well as the key findings report, and the draft consultation document meet this interest to a substantial degree. However, the submission advises that

this interest is substantially diluted because the consultation document is due to be published imminently. When the consultation goes live the product of the NASG's work will be visible to anyone who wishes to read the document. The chance to take an active part in increasing accessibility on the railway will be open to all. GBRTT advises that it expects the consultation to begin within the next three months.

38. Against disclosure, GBRTT argues that there's a substantial public interest in allowing the group to do its ongoing work without interference. It still needs to discuss proposals presented to it and provide its expert advice on future issues. Disclosure is likely to have a chilling effect on these discussions and to lead to future advice being tempered.
39. GBRTT has noted that the Commissioner has frequently acknowledged that it's the case that "If the issue in question is still live, arguments about a chilling effect on those ongoing discussions are likely to be most convincing." GBRTT says that this is the case in this instance since the consultation is yet to 'go live' and the NASG is continuing its work.
40. Acknowledging that in most cases civil servants should not be swayed by press and public attention, GBRTT says it's worth noting first, that the NASG is not composed solely of civil servants; and second that the issue of accessibility on the railway is one that stands out since it stirs public passions and attracts substantial press coverage. This coverage is often emotive and frequently targets individual decision makers. This increases the potency and likelihood of the chilling effect on the NASG's members. GBRTT has provided the Commissioner with links to relevant news articles.
41. GBRTT says that maintaining the integrity of these processes is vital for the steering group to operate. The NASG needs to be able to provide advice freely and members must be able to ask for and receive advice, exchange views frankly and generally conduct and manage affairs related to its remit effectively. Similarly, damaging the integrity of the process strips the safe space the Minister and DfT are entitled to in order to reach decisions away from external interference and distraction.
42. Maintaining the exemption supports the internal and formal decision-making processes of the steering group but ensures that decisions made (both by the group in formulating advice and the executive in developing policy) are properly considered and made on the basis of the best advice.

Balance of the public interest

43. When he considers the balance of the public interest, the Commissioner takes account of the weight of the QP's opinion, the timing of the request, and the severity, extent and frequency of the envisioned prejudice or inhibition.
44. The QP in this case was the Rail and HS2 Minister, and, as such, he had the requisite knowledge of the NASG's work and the consequences of any disclosure. The Commissioner therefore gives their opinion a measure of respect.
45. The context in which the NASG works is discussed further below under 'Other matters.' However, the NASG is associated with the delivery of one of two work commissions from DfT. A core programme team is taking that work forward, developing and preparing recommendations for final decision-making by DfT. The NASG's role is to support this process by providing input, advice, and assurance to the programme team.
46. Moving on to the timing of the request, when the request was submitted in June 2023 NASG's work was very much 'live.' It was in the process of developing a consultation on an accessible rail network and was also preparing related recommendations for a decision by DfT.
47. Finally, the Commissioner has considered the severity and extent of the envisioned prejudice. The Commissioner has found that disclosing the information would be likely to inhibit frank discussion and inhibit the giving of advice. As such, he's found that disclosing the information would be likely to harm decision-making and the accessibility strategy about which the decisions are being made.
48. Robust decisions important here because they would ultimately impact on the users of the rail network. The Commissioner considers that the prejudice resulting from disclosure would be severe and, given the number of users of the rail network and their different needs, extensive.
49. The QP's opinion, the timing of the request, and severity and extent of the envisioned prejudice carry weight. Transparency about the NASG's work also carries weight. However, in the Commissioner's view that weight is lessened by the public consultation that's going to be rolled out, which will include publishing some of the information requested here.
50. On balance, the Commissioner finds that at the time of the request the public interest favoured maintaining the section 36(2)(b)(i) and section 36(2)(b)(ii) exemptions.

51. The Commissioner has decided that GBRTT has correctly applied these exemptions to the information it's withholding and that the public interest favoured maintaining the exemptions. As such, it's not necessary to consider GBRTT's application of section 22(1) or 40(2) to that information.

Section 40 – personal data

52. GBRTT disclosed a terms of reference document. This included the name of GBRTT's then Lead Director, but GBRTT had redacted other names from this document under section 40(2) of FOIA. The redacted names are those of members, advisory members and deputies involved in the NASG.
53. GBRTT had explained to the complainant that it had released the Lead Director's name because salaries of more than £150,000 carry an increased expectation of individual accountability.
54. Under section 40(2) of FOIA information is exempt information if it's the personal data of another individual and a condition under section 40(3A) is satisfied.
55. In this case the relevant condition is contained in section 40(3A)(a). This applies where disclosing the information to any member of the public would contravene any of the principles relating to the processing of personal data as set out in Article 5 of the UK General Data Protection Regulation (GDPR).
56. First, the Commissioner is satisfied that the information in the terms of reference document to which GBRTT has applied section 40(2) can be categorised as personal data. This is because the information is people's names. As such the information relates to those individuals ('the data subjects') and they can be identified from it.
57. The Commissioner has next considered whether disclosing the information would contravene one of the data protection principles, namely the principle set out under Article 5(1)(a) of the UK General Data Protection Regulation (GDPR). This says that personal data must be processed lawfully, fairly and in a transparent manner.
58. To be lawful one of the lawful bases under Article 6(1) of the UK GDPR must apply to the processing of the personal data. The Commissioner considers that the lawful basis most applicable is basis 6(1)(f) which states:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and

freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

59. The complainant has an interest in an accessible rail network and in the work of the NASG. The Commissioner accepts that this interest is an entirely legitimate interest for them to have.
60. GBRTT recognises that there's a legitimate interest in the public knowing the identities of members of the NASG. This information would give some insight into whether the group is sensibly constituted and whether its members are suitably qualified to sit on the steering group (it's shown in the terms of reference which organisations are represented and which areas of the transport industry).
61. Both the GBRTT and the Commissioner consider that disclosing the information would be necessary to satisfy this interest as there are no less-intrusive methods of determining who the remaining members of the NASG are.
62. Finally, the Commissioner has considered whether the legitimate interest in disclosure outweighs the rights of the data subjects.
63. In its submission, GBRTT says that in its view disclosure would disproportionately infringe the rights of the data subjects involved.
64. It notes that the Commissioner's guidance on requests for personal data about public authority employees says: "The more senior an employee is and the more responsibility they have for decision making and expenditure of public money, the greater their expectation should be that you disclose their name".
65. GBRTT says that those earning less than £150,000 wouldn't expect their name to be disclosed. Of the names listed on the NASG terms of reference document, only Anit Chandarana can be categorised as a 'high earner'. As his name is already in the public domain as a senior official, GBRTT therefore disclosed it.
66. The remaining individuals involved, GBRTT says, wouldn't have had an expectation that their names would be released into the public domain in response to an information request. The NASG is not a meeting of senior officials to make policy decisions; rather, the group is made up of people at different levels within their respective organisations. They're selected for their subject matter expertise and are there to provide assurance. This includes independent members and representatives of organisations that sit outside the public sector. Decision-making by senior officials is carried out further down the line by the DfT, once recommendations have passed through the steering group. As such, members of NASG would have the same expectation of confidentiality as

other public servants carrying out work below the level of the 'high earners.

67. GBRTT considers that disclosing these names would be a breach of the reasonable expectation of privacy held by the group members. It would open them up to the likelihood of direct contact and personal scrutiny from activists and others wanting to know more about the activities of National Rail Accessibility Strategy and the NASG. This would constitute a disproportionate and unwarranted level of interference with their rights and freedoms. GBRTT says that this is of course exacerbated by the fact that accessibility issues on the railway are often contentious (as the news articles GBRTT referenced suggest) and have the potential to lead to individuals and organisations being targeted by campaigners.
68. GBRTT therefore maintains that in this instance, the rights of these members to privacy outweighs the legitimate interest in knowing who makes up the steering group.
69. The Commissioner accepts that the individuals concerned are likely to have volunteered to be a member of the NASG and know the NASG's remit and its work with DfT. They might therefore have had some expectation that their names could be requested under the information legislation. The Commissioner notes that while members' names have been redacted from the terms of reference document, their role, and the organisation that they represent haven't been. In the Commissioner's view, giving someone's name doesn't necessarily provide any more insight than what's provided through disclosing that person's organisation and their role in it.
70. However, in this case, disclosing members' names would risk those individuals receiving unwanted contact from campaigners who feel strongly about accessibility and the rail network. The Commissioner isn't suggesting that the complainant in this case is one such campaigner but disclosure under FOIA is, in effect, disclosure to the wider world not just to a requester. In addition, the NASG members aren't the final decision-makers – that's DfT. Their salary levels would also reduce their expectation that their personal data would be disclosed. Disclosing their names would therefore be likely to cause those individuals a degree of damage and distress.
71. The Commissioner considers that the public interest in transparency around the NASG and associated accessibility strategy is met to an adequate degree by the information GBRTT has disclosed and the associated consultation about the accessibility strategy.

72. He isn't persuaded that the legitimate interests in disclosure outweigh the rights of the data subjects. As a result, there's no lawful basis on which the information could be published and so GBRTT is entitled to rely on section 40(2) of FOIA to withhold the names of the remaining members of the NASG.

Other matters

73. In its submission to the Commissioner GBRTT has provided the following clarification about the NASG's role and position within GBRTT. The Commissioner is reproducing it here for the complainant's benefit.

"The applicant has asked for information specifically on the NASG. We think it is important to begin by providing some background information on the NASG, including details of the group's role, its composition and how it relates to the wider structure and aims of GBRTT. This context helps to remove any ambiguity and has a significant bearing on what information is captured by the applicant's request.

To fully explain the role of the NASG it is necessary to first give an overview of the programme it supports. The National Rail Accessibility Strategy (NRAS) programme exists to deliver two work commissions from the DfT: the NRAS itself and the Stations Accessibility Audit Phase 2 (AAP2). The NRAS is intended to be a strategy that demonstrates a joined-up, system-wide approach to accessibility to deliver a more coherent and consistent service across the rail network, making it more accessible for all disabled passengers. The AAP2 is the second phase of an audit of all stations commissioned from Atkins by the DfT. The aim of this phase is for GBRTT to take ownership of the audit data and develop a strategy both for embedding it in passenger-facing channels and keeping it up-to-date long term. Both aspects of the programme are being developed by a team referred to as the core programme team.

The role of the core programme team is to develop and prepare recommendations for final decision-making by the DfT. The role of the NASG is to support this process by providing input, advice, and assurance to the programme team.

The NASG is a cross-industry group, chaired by GBRTT and attended by representatives of: GBRTT, the DfT, the Office of Rail and Road (ORR), the devolved authorities, the Disabled Persons Transport Advisory Committee (DPTAC) and Passenger Focus...

... The core programme team also receives input from the National Advisory Group (NAG), a group made up of disabled people and representatives of organisations. However, this is entirely separate to the NASG and takes place before proposals are put to the steering group.

When considering the applicant's request for information we believe it is important to be very clear about the distinction between the role of the core programme team and the role of the NASG. Indeed, we have found that it would have assisted our handling of the original request had we made this delineation clearer at an earlier point.

When processing request [redacted] and when carrying out our internal review [redacted], we did not distinguish precisely enough between the term "NASG" (referring to the steering group) and the term "NRAS" (referring to the core programme team and associated strategy). The effect of this was two-fold: it meant that we did not explain the reasoning for some of our response clearly enough to the applicant and it also led to us erroneously identifying as in scope some information which, having again revisited the wording of the request, we now realise should not have been captured.

I will briefly indicate below the parts of our response where our failure to fully consider the difference between "NASG" and "NRAS" meant that we did not respond completely accurately:

Workstreams within the NASG – The applicant asked for: a list of any workstreams within the NASG (including within any subgroups); a description of what these subgroups are; details of the actions in process within said workstreams; and any completion dates (whether past or future) for these actions.

We advised that there were two workstreams within the NASG: the NRAS and the AAP2 and provided all relevant information on both to satisfy the applicant's request. We were, however, incorrect in asserting that these workstreams sat within NASG, as explained above, these are work packages within the core programme team. NASG supports the core programme team with assurance in its delivery of both of these work packages, in its capacity as a steering group.

Details of research – The applicant asked for details of the research that has been or is being carried out/commissioned by the NASG and details of how decisions are taken and research directions set. We advised that we held a draft consultation document that addressed this point. This was inaccurate, as the role of the steering group is purely advisory: it does not carry out or commission research. The

draft consultation document we referred to was produced by the core programme team for the steering group's review; it was not put together by the NASG.

Reports – The applicant requested any reports produced by the NASG since its establishment. When searching for relevant records we again failed to delineate properly between the core programme team and NASG. This led to us explaining that we held a key findings report, which informed the draft consultation. Again, this was inaccurate considering the NASG's role as an assurance and steering body. The NASG does not produce reports but reviews and approves them. The key findings report was compiled by the core programme team for submission to the steering group and as such cannot technically be said to have been produced by the NASG.

The other aspects of the applicant's request (such as the request for NASG meeting minutes and for the group's terms of reference) all relate clearly and unambiguously to the NASG itself and our responses on each of these points still stand.

We do understand that the relationship between the NASG and the core programme team that works on delivering NRAS is complex and not something the applicant could be expected to be familiar with from an outsider's perspective. While we did want to be clear about the difference between the two – and to note that the draft consultation document and the key findings report do not strictly speaking fall within the scope of the request wording – we are aware that it would be obtuse at this stage to suggest that the applicant submits a revised request.

Had we delineated NASG and the core programme more clearly from the start, we should have asked the applicant at that point to confirm that they were interested in research and reports carried out by the programme team, not by the steering group. As, however, we did not do this, we accept that the draft consultation document and the key findings report have been previously considered as within scope of the applicant's request and we will therefore continue to treat them as such. In both cases, we wish to maintain our position on exempting these from disclosure and will explain why in further detail."

74. GBRTT's application of the exemptions under section 36 and 40 of FOIA to the information in question have been considered in this notice.

Right of appeal

75. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals
PO Box 9300
LEICESTER
LE1 8DJ

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: grc@justice.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

76. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
77. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Cressida Woodall
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