

13 June 2025

Dear

Request for Information - ATISN 24664

Thank you for your request for information which I received on 23 April. I apologise for the delay in responding to you.

Your request

You have asked for the following information regarding the publication of the following information:

1. Transport for Wales Digital Customer Strategy 2024
2. Business Case for the Multimodal Journey Planning & Digital Retail Programme 2024 (including the WelTAG, cost and revenue modelling that supported this)

Our response

I can confirm that the Welsh Government holds the information you have requested.

1. For question one, the Transport for Wales Digital Customer Strategy 2024 is already available in the public domain and can be accessed on the TfW website using the following link:

[Business Plan, 2024/25](#)

<https://tfw.wales/sites/default/files/2024-03/TfW-Business-plan-2024-ENG.pdf>

2. For question two, the business case for the Multimodal Journey Planning & Digital Retail Programme 2024 is appended at Annex A. It is important to note however, that the programme has evolved since it was originally agreed and therefore this copy is not fully reflective of the current status. Some of the financial information has been withheld under Section 43 of the Freedom of Information Act 2000, Commercial Interests. Full reasoning for applying this exemption is appended at Annex B.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit
Welsh Government

Cathays Park
Cardiff
CF10 3NQ

or Email: Freedomofinformation@gov.wales. Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Personal information

The request you sent me contains personal information about you - for example, your name and email address. The Welsh Government will be the data processor for this information and, in accordance with the General Data Protection Regulation, it will be processed in order to fulfil our public task and meet our legal obligations under the Act to provide you with a response. We will only use this personal information to deal with your request and any matters which arise as a result of it. We will keep your personal information and all other information relating to your request for three years from the date on which your request is finally closed. Your personal information will then be disposed of securely.

Under data protection legislation, you have the right:

- to be informed of the personal data we hold about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

For further information about the information which the Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer
Welsh Government
Cathays Park
CARDIFF

CF10 3NQ

Email: DataProtectionOfficer@gov.wales

Any information released under the Freedom of Information Act 2000 or Environmental Information Regulations 2004 will be listed in the Welsh Government's Disclosure Log (at <https://gov.wales/about/open-government/freedom-of-information/responses/?lang=en>).

Yours sincerely

Section 43 (2) – Commercial Interests

The information caught by this exemption relates to financial/commercial information included in the Business Case for the Multimodal Journey Planning & Digital Retail Programme 2024. The information also includes the names of the third-party suppliers who provide software products to Transport for Wales. Decisions relating to non-disclosure of this information have been taken with due consideration of the exemptions identified under Section 43(2) of the Freedom of Information Act 2000 (FOIA). This exemption states that:

- (2) *Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).*

Section 43 is a qualified (public interest tested) exemption. This means that in order to engage it, I must show that the public interest in withholding the information is greater than the public interest in releasing it. I have therefore given consideration to the effects of disclosure of the information to the world at large as the information is made available to anybody and everybody, not just the requestor.

Public Interest For Release

I recognise the general public interest in openness and transparency and releasing the financial information would help the public gain a better understanding of the decisions made by Government. It is also recognised that there is a public interest in how public money is to be, or has been, used to ensure that Government gets the best value from the public purse.

Public Interest Against Release

The information includes references to Transport for Wales' (TfW) commercial negotiations with third parties. It would be likely that the release of the information to the world at large would prejudice TfW's commercial relationships with its suppliers and other third-party contractors. Some of those contracts will include details about TfW's physical and cyber security and business continuity processes. In light of the current relationship between the Welsh Government and TfW, and TfW and its supply chain, the confidential nature of the withheld information and the mutual understanding that the information remains commercially sensitive, the possibility of prejudice to TfW occurring is real and more than a hypothetical possibility.

The information also includes the names of the third-party suppliers who provide software products to Transport for Wales. Release of this information could be used by malicious actors to seek to gain access to important systems which fall under the UK Government's Network and Information System (NIS) Regulations. Railways are classed as critical national infrastructure, and details relating to their digital systems pose a risk to TfW's cyber security arrangements by being released in this FOI.

I believe the public interest is satisfied by the amount of information being disclosed in response to this request for information.

I am aware that as a general rule, the sensitivity of information is likely to reduce over time, so that the age of information, or timing of the request may be relevant in determining whether to apply the exemption, or where the public interest may lie. In this case, however, the information captured is very much current information.

In conclusion, I believe that the balance of the public interest therefore falls in favour of withholding the financial information relating to Transport for Wales' commercial negotiations with third parties.