

I Madder  
[request-97109-051df255@whatdotheyknow.com](mailto:request-97109-051df255@whatdotheyknow.com)

7 February 2012

Dear Mr Madder

## **INTERNAL REVIEW OF FREEDOM OF INFORMATION REQUEST**

I am writing to present the findings of our internal review. This internal review was conducted following your request, dated 17 January 2012, to have the Freedom of Information response issued by East Coast 16 January 2012 reviewed. The internal review was conducted in accordance with the procedure set out in the Company's Complaints and Appeals Policy for requests for information under the Freedom of Information Act 2000. The review has been undertaken by Michael Holden, Chairman of East Coast Main Line Company Limited and Chief Executive of Directly Operated Railways Limited. As the review co-ordinator it is my responsibility to inform you of the outcome of the review.

Michael Holden has reviewed the response by East Coast dated 16 January 2012 in response to your Freedom of Information Act request dated 14 December 2011. All aspects of the letter have been reviewed and reconsidered together with the information that was withheld and the legislative exemptions that were applied including public interest considerations for and against disclosure. Following this review Michael has concluded that the response dated 16 January 2012 is in his view correct and that he believes the public interest test has been applied correctly and no additional information should be disclosed.

In specific response to the questions you raised:

**1) I note you have decided to withhold a lot of information on some exemptions, mainly related to fare evasion and revenue collection. I wish to dispute this, if someone is determined to not pay a fare, withholding information is not going to stop them.**

We do not propose to provide these details for the reasons referred to in the original response, dated 16 January 2012.

**2) You have failed to provide me with the named person who answered my request, instead there is illegible scrawl for a signature.**

We can confirm that the original response was issued by Matt Short, Franchise Compliance Manager.

**3) On page two of Appendix VIII you have omitted the names of the senior managers despite your letter saying you have only omitted people who are not senior managers or directors.**

This appendix was not redacted. The names or pictures of the East Coast Executive Team do not appear on this document.

The names or personal details of Senior Managers or Directors have not been redacted from any of the documentation disclosed. However, on one of the appendices, the names of certain non-management staff were included by mistake. We will be contacting the 'What do they know' website to replace this document with another that has these names removed.

**4) In Appendix XXIX you have failed to disclose the "Security Principles" yet have released them in previous documents, is this an oversight?**

The information removed from the presentation (Appendix XXIX) did not concern "security principles", it related to fare evasion and revenue protection. While a very similar presentation may be used for a different area of the business that includes "security principles", the presentation used for automatic ticket gateline staff, this appendix, does not include such information.

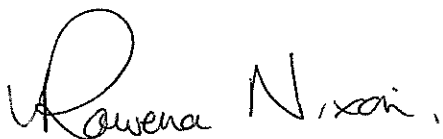
In conclusion, the findings of the internal review are that the original response issued by East Coast on 16 January 2012 was appropriate and, where applied, exemptions and the public interest test have been used correctly.

If you are not satisfied with the outcome of this review, you have the right to complain to the Information Commissioner by contacting:

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

Telephone: 08456 30 60 60 or 01625 54 57 45 Website: [www.ico.gov.uk](http://www.ico.gov.uk).

Yours sincerely

A handwritten signature in black ink that reads "Rowena Nixon". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Rowena Nixon  
**Company Secretary**