



Date
18 March 2025

Post Office
100 Wood Street
London EC2V 9ER

Your Ref:

Classification:
Public

Dear [REDACTED],

Freedom of Information Request – FOI2025/00144

We are writing in response to your email received by Post Office Limited ("**Post Office**") on 28 February, which has been dealt with under the terms of the Freedom of Information Act 2000 ("**FOIA**").

In your email, you have requested the information shown verbatim in bold with our answers in turn below:

"1) The number of roles across all components of your operations, directorates and management structures, expressed in numbers of full-time employees (FTE), that are mainly or exclusively focussed on issues of equality, diversity, or inclusivity. This information should encompass all roles based in central offices, as well as those based around the country.

Roles meeting this description could include (amongst other guises) "Equality, Diversity and Inclusion Officer" (EDI) or "Diversity and Inclusion Project Managers". Please break down, if possible, the number of roles per component part of your operations.

For all roles meeting this description, please also provide, in order of preference, either a) the salary of these roles, b) the pay band of these roles, or c) the combined total salary of these roles. Please provide the information that is most in accordance with your data processing practices.

We can confirm that Post Office does hold the information you have requested, however are withholding some of this information under exemptions in sections 40(2) and 40(3A) of the FOIA as the information constitutes personal data relating to other persons; and section 43(2) of the FOIA, which relates to information which would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it)

As there are fewer than ten roles relating to Diversity, Equity and Inclusion (“**ED&I**”), Post Office has determined that the information should be withheld under sections 40(2) and 40(3A) of the FOIA as the information constitutes personal data relating to other persons. These sections exempt personal information from disclosure if that information relates to someone other than the applicant, and if disclosure of that information would breach any of the data protection principles in Article 5(1) of the UK General Data Protection Regulation (“**GDPR**”).

We consider that disclosure of this information is likely to breach the first data protection principle, which provides that personal data must be processed lawfully, fairly, and in a transparent manner. Disclosure would not constitute 'fair' processing of the personal data because Post Office staff involved would not reasonably expect their job title, grade or salary, to be disclosed in relation to this request for information as they may become identifiable.

Post Office has also determined that the salary of each team member should be withheld under section 43(2) of the FOIA which relates to information which would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosure. We recognise that there is a public interest in disclosure of information concerning details of the current Post Office salary of each team member, as this helps promote transparency in Post Office business and reassurance about the way public money is being spent.

On the other hand, there is a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of Post Office. This is because disclosing information about current pay scales showing annual salaries, would harm the negotiation capabilities of Post Office with internal and external candidates. Salaries are also determined on a case-by-case basis and so providing

the information you have requested, would give competitors of Post Office a commercial advantage in knowing what salaries Post Office offer. It would therefore not be in the public interest to disclose this information.

Please also advise if there are any plans to hire further staff in these areas within the next 18 months, and the roles/pay bands that they are likely to occupy.

We can confirm there are no planned changes.

2) With the same criteria as above, please provide the number of internal training courses attended by staff which pertain to the issues encompassed by equality, diversity or inclusivity. Please include the name of the courses, the number of attendees, and the duration of the course.

We can confirm a list of courses taken in the last 12 months with the number of attendees next to each one. Each course duration is between 20 – 45 minutes, except Post Office Managers Programme (which is 4 hours).

Post Office Managers Programme- ED&I Module: 88
Active Bystander- Manager: 9
Active Bystander- General: 23
Allyship in practise- Manager: 32
Dignity and respect- Manager: 28
Dignity and respect- Team: 17
Disability inclusion in practise- Manager: 14
Disability inclusion in practise- Team: 12
Does Diversity and Inclusion training work: 26
Equality, Diversity, Inclusion and Belonging- Manager: 51
Equality, Diversity, Inclusion and Belonging- Team Member: 124
LGBT inclusion in practise- Manager: 11
LGBT inclusion in practise- Team: 7
Menopause- starting the conversation: 13
Mental Wellbeing at work- Manager: 13
Mental Wellbeing at work- Team: 12
Microbehaviours: 12
Modern Slavery and Human Trafficking: 6 (Additional to the mandatory course)
Neurodiversity Inclusion in practise- Manager: 19

Neurodiversity Inclusion in practise- Team: 23
Sexual Harassment at Work: 11
The Uncomfortable Conversation: 12
The Uncomfortable Truth: 18
Trans & Non-Binary Inclusion in practise- Manager: 8
Trans & Non-Binary Inclusion in practise- Team: 9
Unconscious Bias in Practise- Manager: 21
Unconscious Bias in Practise- Team: 21
Bullying and Harassment in the workplace- Manager: 12
Bullying and Harassment in the workplace- Team: 4

3) Please, if possible, provide details of any internal EDI practices and networks, including the number of individuals who are members of such networks.

Affinity Gender Equality: 128
Complexions Race and Culture: 183
Be You Disability: 143
Prism LGBTQ+: 72
ED&I Champions: 205

4) Please provide details of any external contractors brought in by the department to conduct training, advice, or guidance on issues relating to EDI. Where applicable this should include costs and associated manhours.

We can confirm there were two 3-hour sessions for Inclusive Leadership Training with 39 employees total in attendance and total spend was £21,769.

5) Please provide details of how equality, diversity and inclusivity is included in your procurement practices, the relative weight afforded to these considerations, and the current value of contracts in which EDI considerations was a part of the procurement process.

We can confirm we have a Supplier Code of Conduct which is available to download from our corporate website from this page:

<https://corporate.postoffice.co.uk/en/governance/our-suppliers/working-with-us/>

All suppliers who register with us are asked to read it and acknowledge its contents. It sets out expected behaviours and includes a section on discrimination.

<https://corporate.postoffice.co.uk/media/23igirqa/supplier-code-of-conduct2022.pdf>

We are subject to the Procurement Act 2023 and therefore the Public Contracting Regulations 2024 and the National Procurement Policy Statement.

Please see:

<https://www.gov.uk/government/collections/information-and-guidance-for-suppliers> and <https://www.gov.uk/government/publications/national-procurement-policy-statement>

All our procurement decisions are compliant with this legislation and the principles it embodies.

We are committed to transparency and accessibility and so our onboarding questionnaire and several supplier newsletters that explain our processes are also available on our corporate website. All suppliers are asked about their size and their diverse ownership where applicable as part of our onboarding and due diligence process so that we can monitor the composition of our supply base.

6) If applicable, any data on the number of EDI officers at projects in receipt of funding by your organisation, or available information on their EDI practices. Failing this, your guidance to organisations applying for grant funding on expected equality and diversity practices/benchmarks.

Not applicable and therefore no information is held.

Complying with all 6 questions should not exceed the statutory cost limit, but should you deem that it does, please then proceed with the request excluding those components that would result in the threshold being crossed. At the absolute minimum, I would expect that parts 1 - 4 should be answered."

If you are dissatisfied with the handling of this response, you do have a right to request an internal review. You can do this by writing to the address above within 40 working days of receipt of this response stating your reasons for your internal review request or alternatively, by emailing information.rights@postoffice.co.uk.

If, having requested an internal review by Post Office, you are still not satisfied with our response you also have a right of appeal to the Information Commissioner at:

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

Telephone: 0303 123 1113
www.ico.org.uk/foicomplaints

Yours sincerely,

Information Rights Team
information.rights@postoffice.co.uk
<https://corporate.postoffice.co.uk/en/governance/access-to-information/access-to-information/>

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