



Date  
2 May 2025

Post Office  
100 Wood Street  
London EC2V 9ER

Your Ref:

Classification:  
Public

Dear [REDACTED],

## Freedom of Information Request – FOI2025/00212

We are writing in response to your email received by Post Office Limited (**“Post Office”**) on 27 March, 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 below:

**“Please can you release the unpublished Guiding Principles of the Horizon Shortfall Scheme which the Post Office uses, in tandem with its Terms of Reference, to assess applicants' claims.”**

We can confirm that Post Office does hold the information that you have requested, but we have decided that the information should be withheld under section 42 and section 40 of the FOIA.

Section 42(1) of the FOIA exempts information in respect of which a claim to legal professional privilege could be maintained. This is a qualified exemption and therefore, the public interest test has also been considered.

Post Office is satisfied that the public interest in maintaining the exemption by withholding the privileged information outweighs the public interest in disclosing it. In reaching this conclusion, Post Office has considered a variety of factors for and against disclosure, including the public interest in transparency, specifically relating to the Horizon Shortfall Scheme. Against these factors Post Office notes, in

particular, the strong inherent public interest in preserving legal privilege which it considers, in all the circumstances, outweighs the public interest in disclosure.

The documents you refer to also contain a wealth of personal data in the form of case studies for real claims under the Horizon Shortfall Scheme. Therefore, we have decided that the information containing personal data 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 as claimants of the Horizon Shortfall Scheme would not reasonably expect any identifiable information to be disclosed in relation to any request for information.

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](mailto: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](http://www.ico.org.uk/foicomplaints)

Yours sincerely,

Information Rights Team

[information.rights@postoffice.co.uk](mailto:information.rights@postoffice.co.uk)

<https://corporate.postoffice.co.uk/en/governance/access-to-information/access-to-information/>

**Post Office Limited is committed to protecting your privacy, information about how we do this can be found on our website at [www.postoffice.co.uk/privacy](http://www.postoffice.co.uk/privacy)**