



[REDACTED]

Date
01 November 2024

[REDACTED]
[REDACTED]

Post Office
100 Wood Street
London EC2V 9ER

Your Ref:

Classification:
Public

Dear [REDACTED],

Freedom of Information Request – FOI2024/00909

We are writing in response to your email received by Post Office Limited (“**Post Office**”) on 9 June, 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 provide the names & actual copies of all the Postmaster Policies within the business.

E.g. Postmaster Onboarding Policy, Postmaster Training Policy, Network Transaction Corrections Policy. etc.”

We can confirm that Post Office does hold the information you have requested.

The Postmaster Policies within Post Office are as follows:

- Network Cash and Stock Management Policy
- Network Monitoring and Branch Assurance Support Policy
- Network Transaction Corrections Policy
- Postmaster Account Support Policy
- Postmaster Accounting Dispute Resolution Policy
- Postmaster Complaint Handling Policy
- Postmaster Contract Performance Policy
- Postmaster Contract Suspension Policy
- Postmaster Contract Termination Decision Review Policy
- Postmaster Contract Termination Policy
- Postmaster Onboarding Policy
- Postmaster Training Policy

It may be helpful to know that an overview of the above policies is available to postmasters.

Concerning the second part of your request which asks for the “actual copies of all the Postmaster Policies”, attached to this response email are copies of the Postmaster Policies. However, we have determined that some information should be withheld and the following exemptions have been applied to aspects of the policies, sections 31, 40 and 43 of the FOIA. We have explained the reasons for this below.

Section 31(3) of the FOIA, relates to the prevention or detection of crime. This exemption is engaged because providing some of the information will prejudice the prevention of crime by facilitating the possibility of a criminal offence being carried out.

Section 43(2) of the FOIA has been applied in relation to information which would, or would be likely to, prejudice the commercial interests of any person, including the public authority holding it.

In applying these exemptions, 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 Postmaster Policies of as this helps promote transparency in Post Office business and reassurance about the way public money is being spent. We also recognise that there is a public interest in disclosure of more specific information relating to deposits and withdrawals from Post Office to branches, as this enhances transparency about the ways of working within Post Office.

On the other hand, there is a very strong public interest in withholding information concerning the processes around how cash is withdrawn and deposited as the information held within them could be used as the basis of criminal activity. Disclosure of the information would also prejudice the investigation of any incidents of criminal activity, if it were to occur, and we were found to have disclosed the details of cash holdings at branch levels.

There is also a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of Post Office and third parties. This is because disclosing all the information within the Postmaster Policies would allow

Post Office's competitors an unfair advantage. Disclosure of this information would reveal internal decision-making mechanisms, the risks and control procedures undertaken, as well as transaction procedures within the within Post Office.

Disclosing this data will allow competitors an unfair advantage of knowing the inner workings of Post Office's procedures and protocols, thus not enabling Post Office to operate in a fair marketplace, resulting in commercial damage.

Sections 40(2) and 40(3) of the FOIA have been applied as some of 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 also 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 the staff involved would not reasonably expect their positions and duties, to be disclosed in relation to this 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.

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/>

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