



Date  
29 August 2025

Post Office  
100 Wood Street  
London EC2V 9ER

Your Ref:

Classification:  
Public

Dear [REDACTED],

## Freedom of Information Request – FOI2024/01394

We are writing in response to your email received by Post Office Limited (**"Post Office"**) on 16 October 2024, which has been dealt with under the terms of the Freedom of Information Act 2000 (**"FOIA"**).

Due to the volume and complexity of the information we hold, we have had to extend this case a number of times, and we apologise for the delay in providing our response.

In your email, you have requested the information shown verbatim in bold below:

**"Good afternoon,**

**Please can you disclose the POL Board Minutes and Board papers (including the paper with the title 'GLO separation solution: Managing Issues Arising from GLO Related Matters & Project Starling') from its meeting of 28 July 2020. Please include the list of attendees at the meeting.**

**Please contact me on this email address with any questions or information about my request."**

We can confirm that Post Office does hold the information you have requested. Please find the disclosable information alongside this response letter, titled: **"FOI2024\_01394 POL Board MIN Signed 20200728\_Redacted"** and **"FOI2024\_01394 POL Board Agenda & Papers 20200728\_Redacted"**.

We have, however, determined that some of the information should be withheld as it falls under the exemptions in section 43(2) of the FOIA, relating to commercial interests; sections 40(2) and 40(3A) of the FOIA relating to personal data; section 42(1) of the FOIA relating to legal professional privilege; and section 41(1) of the FOIA, relating to information provided in confidence.

Section 43(2), which relates to information which would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it), is a qualified exemption and, therefore, 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 Post Office Board meetings, as this helps promote transparency in Post Office business and reassurance about the way public money is being spent.

However, there is a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of Post Office or its key stakeholders and partners. This is because although some of this information is five years old, disclosing the information could affect live and current ongoing negotiations with our partners, would prejudice both Post Office and our partners commercial interests. If this information was to be disclosed under FOIA, and, therefore, into the public domain, it would be likely to weaken Post Office's negotiating position in the future and allow competitors – especially those not subject to the FOIA – to understand more about how Post Office carries out these negotiations. It would not be in the public interest to disclose information if Post Office would be unable to operate in a fair marketplace regarding the competitive dialogue procedure and are commercially damaged by the release of the information.

Some of the information requested is considered exempt under section 41(1) of the FOIA, relating information provided in confidence. Post Office considers that release of this information could be actionable as claim information are provided in confidence with a reasonable expectation that they would not be made public.

Although section 41 is an absolute exemption and is therefore not subject to the public interest test, Post Office acknowledges the general public interest in transparency and accountability. However, we consider that disclosure would be likely to place Post Office at a position of risk regarding the contracts with suppliers where this information was provided with an expectation of confidentiality.

The documents requested also hold personal data. Therefore, we have decided this 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 junior employees of Post Office and third parties would not reasonably expect their names, roles and contact details to be disclosed in relation to this request for information.

The Post Office Board Agenda and associated papers contains legal advice. Section 42(1) of the FOI Act 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 Post Office Board meetings. 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.

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/>

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