



[Redacted]

Date
26 November 2024

[Redacted]

Post Office
100 Wood Street
London EC2V 9ER

Your Ref:

Classification:
Public

Dear [Redacted],

Freedom of Information Request – FOI2024/01236

We are writing in response to your email received by Post Office Limited (“**Post Office**”) on 3 September, 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 provide me with a copy of the following information, do let me know if you require more information about this request.

1) The minutes of any meetings of the Post Office Limited's Audit, Risk and Compliance Committee that were held during the 2018/19 financial year.”

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

Please find attached a document of the meetings of Post Office’s Audit Risk and Compliance Committee held during the 2018/19 financial year titled:

“FOI2024_01236 Combined Files 2018-19 ARC Minutes_Redacted”.

Some of the information you have requested falls under the exemption in section 31(1)(a) of the FOIA, which relates to the prevention or detection of crime. This exemption is engaged because providing the information will prejudice the prevention of crime by facilitating the possibility of a criminal offence being carried out.

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 on how much Post Office pays for insurance and what kinds of insurance Post Office has in place as this enhances transparency about the ways of working within Post Office.

On the other hand, there is a strong public interest in withholding information concerning insurance coverage as the information held could be used as the basis of criminal activity / a cyber-attack to try and obtain the information for nefarious means. Disclosure of the information would prejudice the investigation of any incidents of criminal activity if it were to occur.

Some of the information you requested is being withheld as it falls under the exemption in 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 Post Office finances and contracts 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 and those third parties Post Office has contracts with. This is because disclosing information about contracts with third parties would harm Post office's future negotiations with those parties. 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 is commercially damaged by the release of the information.

Post Office's tender as a bidder or potential bidder could also be affected in terms of content or price, reducing the value for money achieved, and providing competitors with an unfair advantage.

A small amount of information has been redacted 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 the information relates to junior employees who would not reasonably expect their names 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