



Date
19 September 2024

Post Office
100 Wood Street
London EC2V 9ER

Your Ref:

Classification:
Public

Dear [REDACTED],

Freedom of Information Request – FOI2024/00552

We are writing in response to your email received by Post Office Limited (“**Post Office**”) on 4 April, which has been dealt with under the terms of the Freedom of Information Act 2000 (“**FOIA**”). We sincerely apologise for the delay in responding to your request.

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

“I am writing to request information from the Post Office Ltd's Audit, Risk and Compliance Sub-Committee Meeting, dated 13th February 2013, under the Freedom of Information Act 2000. I am requesting this in line with ICO guidance on publication of material by companies that are wholly owned by the public. For your reference, the guidance is available at this link: <https://ico.org.uk/media/for-organisations/documents/1239/definition-document-wholly-owned-companies.pdf>

I'd like to request the 'Information Security Paper' which is referenced in the Minutes of the Audit, Risk and Compliance Sub-Committee (ARC) held at 148 Old Street, London EC1V 9HQ on 13th February 2013. This 'Information Security Paper' was shared with the ARC Board and is therefore information that should be 'readily available' in accordance with the ICO guidance accessible through the link above.”

We can confirm that Post Office does hold the information you have requested. We have provided the document titled, 'Information Security Paper', referenced in the Audit, Risk and Compliance Committee meeting that took place in February 2013, with the document accompanying this response letter.

However, some of the information you have requested falls under the following FOIA exemptions: section 43(2), which relates to commercial interests.

Section 43(2) of the FOIA can be engaged where disclosing the information would be likely to prejudice the commercial interests of Post Office and third-party organisations. 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 information security, as this helps promote transparency in how Post Office conducts its business and provides reassurance about the way public money is being spent. It also enables the public to better understand the ways of working in Post Office and how decisions are made.

Disclosing information about matters relating to compliance and security positioning with third-parties, would also prejudice Post Office's commercial interests, as it would give competitors a commercial advantage, by revealing sensitive discussions had with these third-parties. It would not be in the public interest to disclose this 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. Therefore, we have concluded that the public interest in disclosure is outweighed by the public interest in maintaining the exemption.

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