



[Redacted]

Date  
20 November 2024

[Redacted]

Post Office  
100 Wood Street  
London EC2V 9ER

Your Ref: FOI2024/00636

**Classification:**  
Public

Dear [Redacted],

## Freedom of Information Request – FOI2024/00942

We are writing in response to your email received by Post Office Limited (“**Post Office**”) on 21 June, 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:

**“Standard conditions document (attached) contains within Part 5 (1.1) details of available Manuals providing instructions and guidance**

**Could I please make an additional Freedom of Information request for 3 of the manuals listed in Part5 (1.1) these being :**

- 1.Branch Focus**
- 2.Post Office Branch Standards**
- 3.Branch Conformance Standards”**

We can confirm that Post Office does hold some of the information you have requested. We are providing the ‘Branch Standards Booklet’ and the ‘Conformance Booklet’ in the email accompanying this response letter. We can also confirm that the ‘Branch Focus’ isn’t a manual, rather it is a weekly update that postmasters can access through Branch Hub.

However, some of the information within these documents falls under the following FOIA exemptions: section 31(1)(a), which relates to the prevention or detection of crime, section 43(1), which relates to trade secrets, section 43(2), which relates to commercial interests and section 40, which relates to person data.

The exemption at section 31(1)(a) is engaged because providing the information will prejudice the prevention of crime by facilitating the possibility of a criminal offence being carried out.

Section 43(1) and 43(2) of the FOIA, is engaged as disclosing the information would likely to prejudice the commercial interests and any person including the public authority holding it and also reveal trade secrets.

These exemptions are qualified and therefore a public interest test must be carried out for each exemption to determine if it is in the public interest for it to be maintained. The factors that both support and that negate publication are set out below.

We recognise that there is a public interest in disclosure of the Branch Standards Booklet and Conformance Booklet, 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.

On the other hand, there is a strong public interest in withholding information which could increase the likelihood of criminal activity at individual branches or cyber-attacks of Post Office IT systems. Some information contained within these documents mention such issues and therefore disclosure of the information would prejudice the investigation of any incidents of criminal activity if they were to occur. It is also not in the public interest to provide information that may enable such crimes to be committed.

Disclosing information about matters relating to network activity and remuneration would also prejudice Post Office's commercial interests, as it would give competitors a commercial advantage. 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.

We confirm that Post Office has also withheld any names within the Branch Standards Booklet and Conformance Booklet under sections 40(2) and 40(3A) of the FOIA as this 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 names and personal details of staff – both in Post Office and within third party organisations – would not be expected to be disclosed under this FOIA request.

Under our section 16 FOIA duty to provide advice and assistance, we can provide you with an example of one of the weekly copies of Branch Focus. Alternatively, if you would like to provide us with a date range, e.g. 6 May 2024 – 10 May 2024, we may be able to supply the Branch Focus updates from this time period.

Although we may be able to supply an example of a weekly copy of Branch Focus as above, please note, when processing this request, we would need to consider whether any valid FOIA exemptions are engaged.

Please note that if you modify your request to receive a weekly copy of Branch Focus, we will handle it as a new request and so the 20-working-day deadline for responding to requests would then commence from the date that we receive the modified request and may also be subject to the cost limit or other FOI exemptions.

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)**