

Postmaster support policy


Complaint handling

Version 4.0

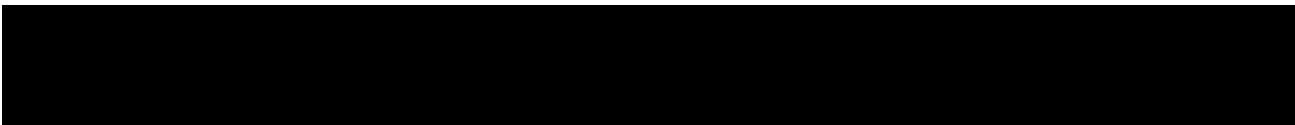



Post Office is determined to reset its relationship with postmasters and has introduced policies that set out guidelines on how Post Office should support postmasters, specifically for use across twelve areas.

The policies stand on their own but should be reviewed in conjunction with each other. Support teams should have an awareness of all twelve policies and how they link together.

The twelve Postmaster Support Policies are listed in section 3.2 of this policy 

Contents page

1 Definitions	5
1.1 Definitions	5
2 Overview.....	7
2.1 Introduction.....	7
2.2 Purpose	7
2.3 Core principles	7
2.4 Application	8
2.5 The risk.....	8
	
3.2 Policy framework	9
3.3 Who must comply?.....	10
3.4 Roles and responsibilities.....	10
	
4 Procedures.....	14
4.1 How to report a complaint.....	14
4.2 Service levels	14
4.3 Executive complaints	15
4.4 Escalating a complaint.....	15
4.5 Speak Up	15
4.6 Control framework (controls reporting risks and process)	16
4.7 Reporting.....	16
4.8 Closing a case	17
5 Where to go for help.....	18
5.1 Additional policies.....	18
5.2 How to raise a concern	18
5.3 Who to contact for more information.....	18
6 Governance	19
6.1 Governance responsibilities.....	19
7 Document control	20
7.1 Document control record.....	20

7.2	Oversight committee.....	22
7.3	Company details.....	22

1 Definitions

1.1 Definitions

1. **Complaint** - any oral or written statement of dissatisfaction, whether justified or not, from, or on behalf of, a Postmaster (whether a limited company, a partnership, a limited liability partnership or an individual) about the provision of, or failure to provide, a product, process or service from Post Office, or the way that Post Office interacts with the Postmaster.
2. **Complaint Handler** – any Employee of Post Office that is in a position to receive a Complaint from a Postmaster in accordance with one of the Complaint reporting channels set out at paragraph 4.1 of this Policy.
3. **Employee** – an individual who has entered into or works under (or, where the employment has ceased, worked under) a contract of employment or any other relevant contract, as defined in sections 230(2) and (3) of the Employment Rights Act 1996, with Post Office or the Group or is defined as a “worker” under section 43K Employment Rights Act 1996.
4. **Postmaster or postmaster** – this refers to a limited company, partnership, limited liability partnership, other entity or individual that contracts with Post Office for the operation of a Post Office® branch.
5. **Post Office and Group** – Post Office Limited and any wholly owned subsidiary that formally adopts this Policy.
6. **RCC** – this refers to Post Office Risk and Compliance Committee.
7. **Service Level (SL)** – the length of time that the Post Office expects that it will take to acknowledge and resolve a Complaint that has been formally raised.
8. **Whistleblowing (or Speak Up)**¹ – the act of a person or, in the case of a postmaster that is a limited company, partnership or limited liability partnership, entity (the “**Whistleblower**”) making a disclosure that the Whistleblower reasonably believes is (a) in the public interest, and (b) regarding past, present or likely future wrongdoing that falls into one or more of the following categories:
 - criminal offences (this may include types of financial impropriety such as fraud)
 - failure to comply with an obligation set out in law (including regulatory breaches)
 - miscarriages of justice
 - endangering of someone’s health and safety
 - damage to the environment
 - covering up wrongdoing in the above categories

¹ The terms, 'whistleblowing' and 'speak up' are often used interchangeably to promote a 'speak up' culture.

- a breach of the Post Office's policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of the Post Office

2 Overview

2.1 Introduction

[REDACTED] has overall accountability to the Board of Directors for the design and implementation of controls to manage Complaints received from Postmasters as defined in this Policy.

This policy is a non-contractual document provided for information. It does not form part of the contract between any Postmaster and Post Office.

2.2 Purpose

This Policy has been established to set the minimum operating standards relating to the management of Postmaster Complaints.

Post Office recognises that Complaints will occur and this Policy lays out the formal Complaints procedure which is intended to ensure that Post Office handle all Postmaster Complaints consistently, fairly and within agreed timescales.

It is one of a set of policies which provide a clear risk and governance framework and facilitate an effective system of internal controls for the management of risk across Post Office. Compliance with these policies is essential to Post Office in meeting its business objectives and to balance the needs of Postmasters, clients, and other stakeholders including our shareholder.

As many postmasters are limited companies or partnerships (and as individual postmasters may appoint managers to operate a branch on their behalf) any steps that need to be taken by a postmaster under this policy can be taken by someone authorised to act on that postmaster's behalf (such as a director, partner or manager).

2.3 Core principles

Post Office will seek to resolve all Postmaster Complaints with fairness, transparency, and professionalism (being the underpinning behaviours of Post Office).

Post Office has an obligation to its customers and clients to ensure that all branches are providing a quality of service and adhering to agreed standards. Post Office is committed to supporting its postmasters in this process by understanding, addressing, resolving and providing insight on Postmaster Complaints. This Policy sets out clear and consistent guidelines to encourage Postmasters to raise issues with Post Office, and to ensure that:

- a standard and consistent process is followed for all Postmaster Complaints.
- the prompt reporting of any Postmaster concerns is encouraged and Post Office will take Complaints raised seriously and investigate as appropriate.

- Post Office will monitor and endeavour to adhere to Service Levels, and keep the Postmaster informed, with a reason and regular updates, if there is an indication that Service Levels may be exceeded.
- Post Office will analyse Complaints data to surface common and/or recurring issues and themes and address them collectively where necessary and improve our business operations.
- Post Office will use Complaints data, and seek feedback on Postmaster satisfaction, to constantly improve our Postmaster experience.
- Post Office will produce information on the volume of Complaints and Post Office's performance against Service Levels and publish this internally on a regular basis.
- Postmaster Complaints data is combined with other postmaster insights and regularly reviewed at the Postmaster Experience Forum.

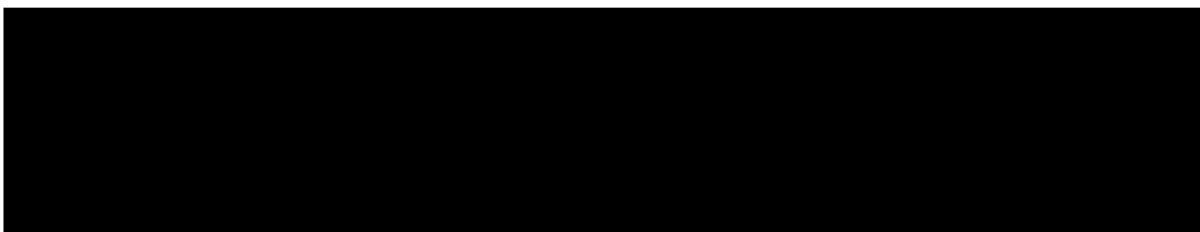
It is vital that the procedures followed in managing Complaints are as clear as possible to ensure a fair, transparent, robust and consistent process for all concerned.

2.4 Application

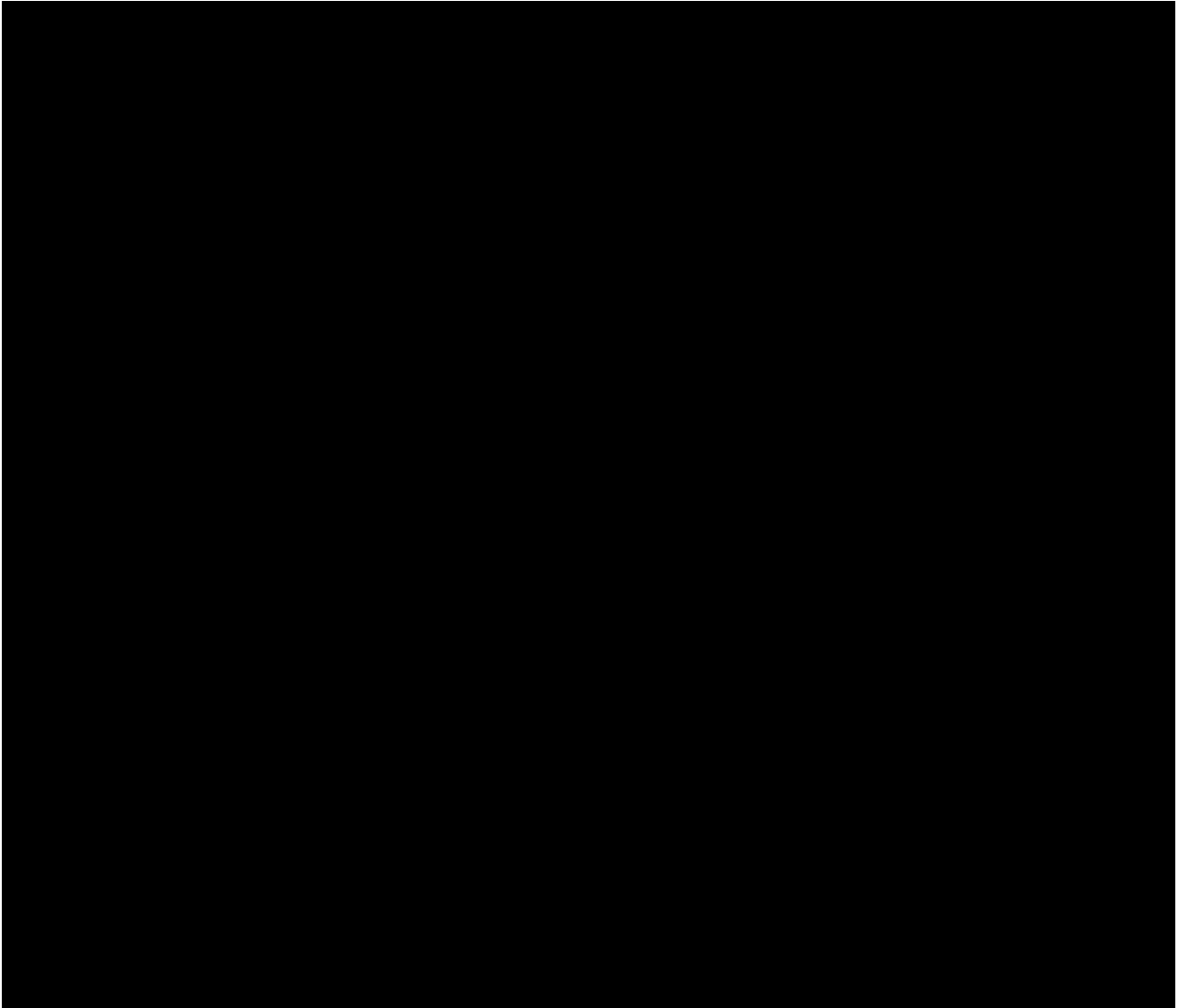
This Policy is for use by Complaint Handlers in relation to Complaints raised by Postmasters, as defined in this Policy, and defines the minimum standards to control financial loss, postmaster impact, regulatory breaches and reputational damage in line with Post Office's risk appetite.

2.5 The risk

Complaints should be taken seriously and managed effectively. Complaints are a good source of feedback about how Post Office can improve. If a mistake has been made, it should be resolved effectively, as soon as possible and the root cause surfaced and addressed to prevent recurrence. Complaints that are not raised, addressed and resolved can lead to Postmaster dissatisfaction, the inability of a Postmaster to operate effectively and the failure of Post Office to meet legal and regulatory requirements.



3 Risk appetite and required operational standards



3.2 Policy framework

This Policy is part of a framework of Postmaster support policies that has been established to set the minimum operating standards relating to the management of postmaster contract risks throughout the business and network in line with Post Office's risk appetite. The framework includes the following policies:

- Postmaster Onboarding
- Postmaster Training
- Postmaster Complaint Handling (this policy)
- Network Monitoring and Branch Assurance Support
- Network Cash and Stock Management
- Network Transaction Corrections

- Postmaster Account Support
- Postmaster Accounting Dispute Resolution
- Postmaster Contract Performance
- Postmaster Contract Suspension
- Postmaster Contract Termination
- Postmaster Contract Termination Decision Review

The Postmaster Complaint Handling policy should be considered and read in conjunction with the Speak Up Policy² should a Complaint be identified as a potential Speak Up report.

3.3 Who must comply?

Compliance with this Policy is mandatory for Complaint Handlers, as defined in this Policy.

Where non-compliance by a Complaint Handler is identified, an investigation will be carried out. Where it is identified that an instance of non-compliance is caused through wilful disregard or negligence, this will be investigated in accordance with the Group Investigations Policy.

3.4 Roles and responsibilities

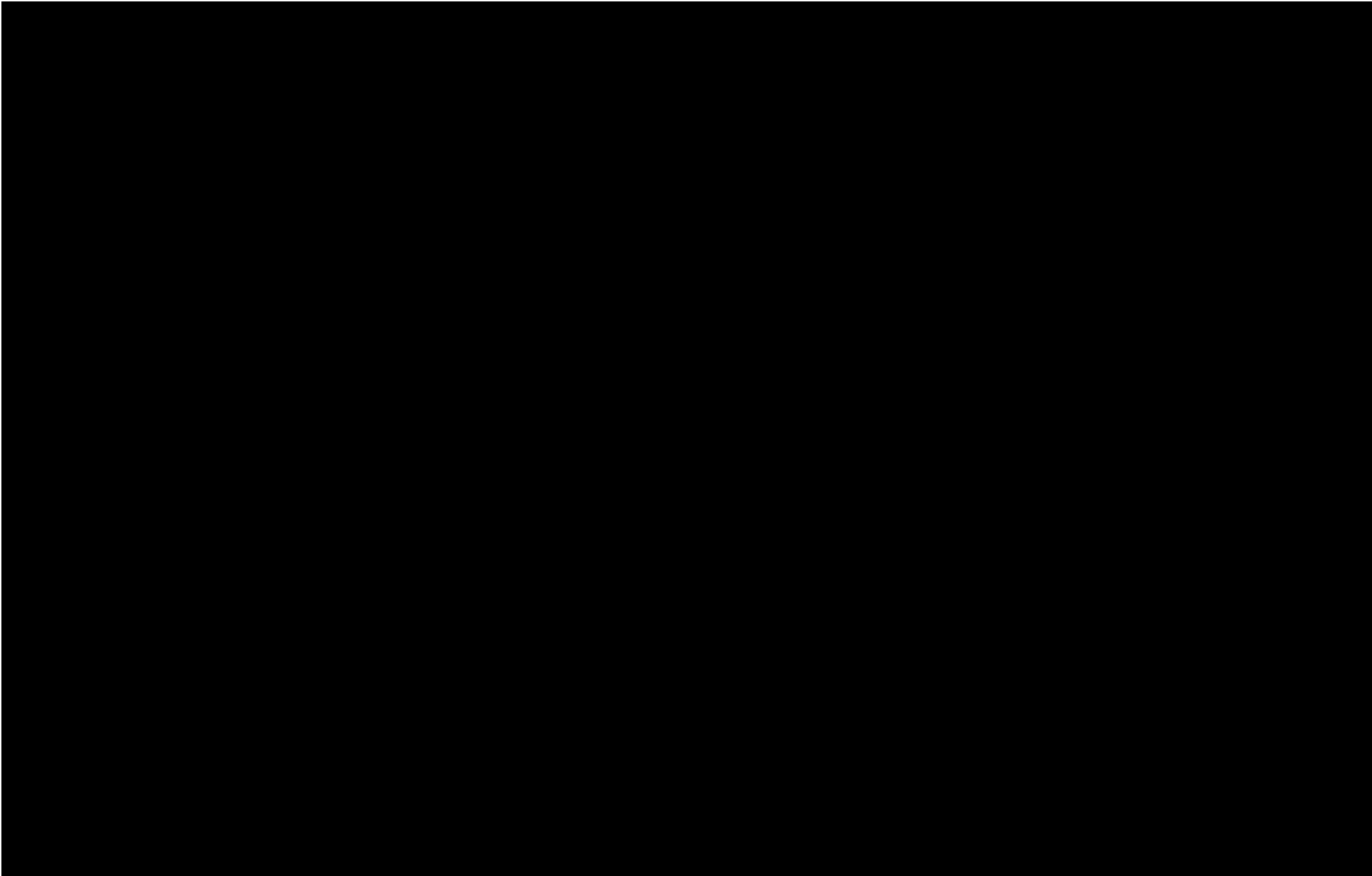
- **Audit, Risk and Compliance Committee** – is the Committee of the Post Office Limited Board which reviews and approves Postmaster Support policies.
- **Risk and Compliance Committee** - is the standing committee of the Strategic Executive Group who review and approve Postmaster Support policies for recommendation to the Audit, Risk and Compliance Committee.
- **The Postmaster Experience Forum meeting,** [REDACTED] should:
 - Review available Postmaster insights on a regular basis.
- [REDACTED] – is the Policy owner who must comply with the governance responsibilities set out at section 6.1.
- [REDACTED] – is accountable for the deployment of this Policy and the support of the team that manage Postmaster Complaints. This role also has the responsibility for regular review of the effectiveness of this Policy and for drafting any amendments that may be required.

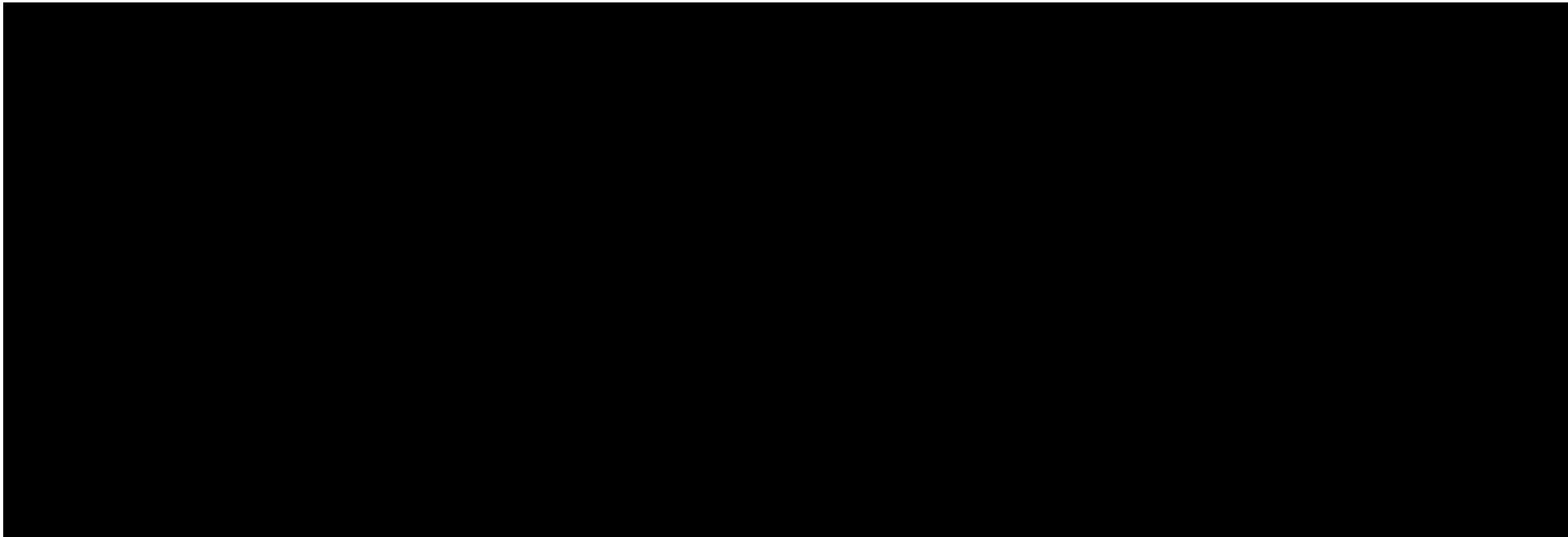
[REDACTED] will lead a team [REDACTED] in carrying out thorough and effective investigations to resolve any Complaints raised.

- [REDACTED] – should:

² The Speak Up Policy [REDACTED]

- be conversant with this Policy and linked policies;
- ensure that the Complaint is acknowledged when received;
- record and log all details of the Complaint promptly and accurately;
- take reasonable steps to ascertain all the facts and detail of the Complaint;
- where necessary, seek open and transparent dialogue with the Postmaster to further understand the Complaint;
- identify Speak Up reports and pass these on to the Speak Up investigation team whilst respecting the confidentiality of the Whistleblower in accordance with and subject to any exceptions in the Speak Up Policy and Procedures;
- act with integrity at all times;
- ensure the Postmaster is kept up to date if Service Levels are likely to be exceeded;
- own and monitor the progress of any investigation carried out by internal departments and third parties;
- resolve the Complaint within agreed timescales and inform the Postmaster accordingly;
- keep records of all material discussions with a Postmaster and other internal departments in the pursuit of information and resolution of a Complaint;
- update case records regularly, and detail Complaint resolutions when the Complaint case is closed;
- [REDACTED] should:
 - understand the requirements of the business to create useful reports for both an internal and Postmaster audience;
 - explore and interrogate the data to surface thematic and recurring detail
- [REDACTED] should:
 - ensure that any Complaints that are passed to the Speak Up investigation team are dealt with in accordance with the Speak Up Policy;
 - communicate regularly with the [REDACTED] to ensure that all Complaints that are Speak Up reports are identified





4 Procedures

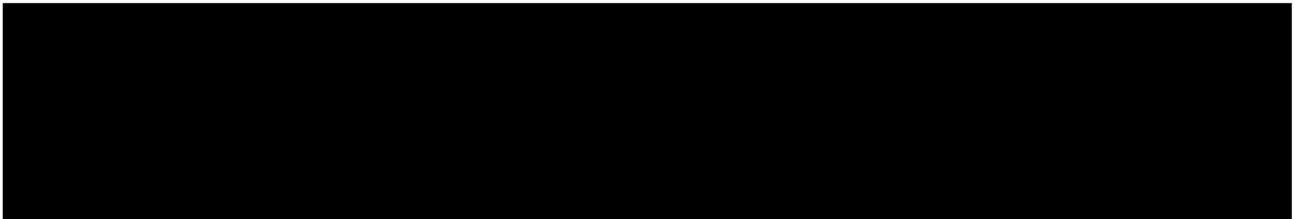
4.1 How to report a complaint

Post Office is committed to finding more ways to listen to Postmasters and supports a number of Complaint reporting channels. The main channels for Complaint raising are:



Branch Support Centre

Postmasters can telephone the Branch Support Centre with a Complaint and a Branch Support Advisor will take ownership of the Complaint and escalate to the Complaint Handling team where necessary.



Unexpressed complaints

Post Office support teams will take reasonable steps to identify Postmaster dissatisfaction which is expressed during their contact with Postmasters and offer the Postmaster the opportunity to raise a formal Complaint.

4.2 Service levels

The [redacted] will aim, where possible, to resolve the complaint within 10 working days once the case is created.

Summary of timelines

Complaint stage	Timeline
Acknowledgment sent	Within 1 working day
Aim to resolve	Within 10 working days

[redacted] regular updates are sent to the branch whilst they seek resolution.

4.3 Executive complaints

Postmasters may address their complaints and issues to senior leaders within Post Office, including the CEO and Board members. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4.4 Escalating a complaint

Complaints that require escalation

If the Complaint Handler is unable to resolve a Complaint, or believes they will be unable to resolve it, the Complaint should be escalated to the [REDACTED] for review. They will either advise the Complaint Handler or take ownership of the resolution.

Postmasters disputing the Complaint resolution

When a Postmaster contacts Post Office to dispute a resolution to an original Complaint, this will be escalated [REDACTED] to review and provide a response.

4.5 Speak Up

Difference between Complaints and Speak Up

A Complaint, as defined in this Policy, is about something that affects the Postmaster (whether a limited company, a partnership, a limited liability partnership or an individual) or the branch. For example, if deliveries are not picked up on time. However, if reporting the wrongdoing is in the public interest then it could fall under the definition of Whistleblowing (or Speak Up), as defined in this Policy.

Speak Up disclosures can have certain protections that Complaints do not. Therefore, it is important to identify which type of report is being made from the outset.

The Speak Up Policy³ should be consulted before a report is made or sent to another team by the Complaint Handler.

The [REDACTED] meets with the [REDACTED] monthly to quality assure any complaints that could potentially be Speak Up cases.

In order to assist in identifying whether a report is a Complaint or Speak Up, please see the examples below. Further examples of events which may lead to a Speak Up disclosure are set out in the Speak Up Policy.

³ The Speak Up Policy can be found [REDACTED]

Speak Up	Complaint
A Postmaster’s assistant has seen a colleague processing card payments with someone else’s card and with no customer present.	A Postmaster complains that their card machine does not work, and that no replacement has been sent.
When reporting an issue with ██████████, a Postmaster’s assistant reports that a POL employee asked her ██████████ ██████████ to access Horizon.	A newly hired Postmaster’s assistant forgets to ask the customer for their ID.
A Postmaster contacts an ██████████ with a discrepancy that they can’t find the reason for and is immediately advised that it’s best that they just pay for it. The Postmaster feels this is not in the spirit of the GLO and complains.	A Postmaster complains that they do not understand how to process a customer’s Savings account application and that Post Office training has not been provided on this.
A Postmaster’s assistant complains that a colleague has been making racist/discriminatory remarks to other members of staff and members of the public.	A Postmaster’s assistant complains that they feel they are being bullied by the Postmaster.

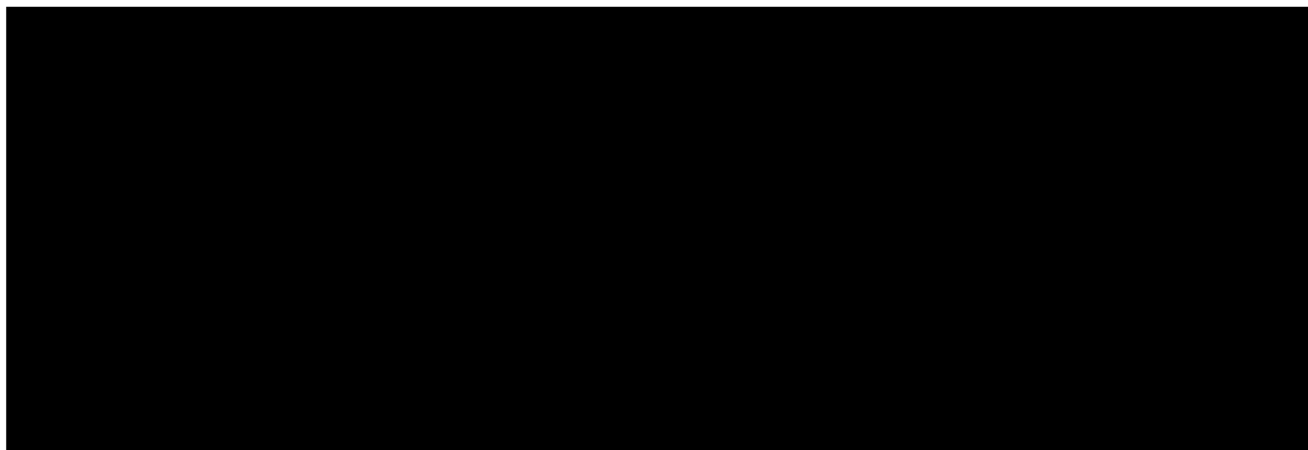
Any Complaints received that are triaged and found to be Speak Up reports will be forwarded to the ██████████ immediately in accordance with the Speak Up Policy and Procedures, and with confidentiality protected subject to any exceptions set out in the Speak Up Policy.

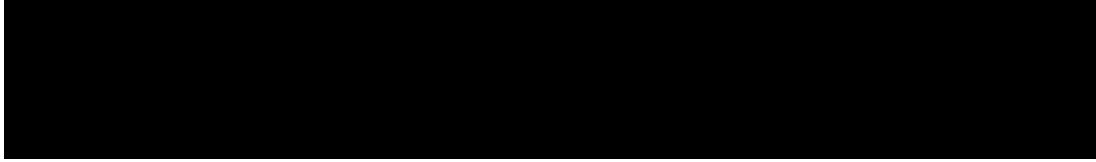
For more details as to where and how to make Speak Up reports, please refer to the Speak Up Policy.

4.6 Control framework (controls reporting risks and process)

Self-assessment controls are in place around the risk descriptions, and these must be adhered to.

4.7 Reporting





4.8 Closing a case

Post Office will close a Complaint case at resolution. The resolution email sent to the postmaster will set out the options for disputing the findings.

5 Where to go for help

5.1 Additional policies

This Policy is one of a set of policies. [REDACTED]
[REDACTED]

5.2 How to raise a concern

Any postmaster, any postmaster's staff or any Post Office employee who suspects that there is a breach of this Policy should report this without any undue delay.

If a postmaster or any postmaster's staff are unable to raise the matter with the area manager of the relevant branch or if a Post Office employee is unable to speak to her or his line manager, any person can bring it to Post Office's attention independently and can use the Speak Up channels for this purpose. Any person can raise concerns anonymously, although disclosing as much information as possible helps ensure Post Office can conduct a thorough investigation.

For more details about how and where to raise concerns, please refer to the current Speak Up Policy
[REDACTED]

Please note that a postmaster may also contact the National Federation of Sub-Postmasters (NFSP) for help and support, by contacting their helpline on 01273 452324 or by emailing admin@nfsp.org.uk.

5.3 Who to contact for more information

If you need further information about this Policy or wish to report an issue in relation to this policy, please contact [REDACTED]
[REDACTED]

6 Governance

6.1 Governance responsibilities

The Policy sponsor, the Group Chief Retail Officer of Post Office, takes responsibility for policies covering their areas.

The Policy Owner is [REDACTED] who is responsible for ensuring that the content is up to date and is capable of being executed. As part of the review process, they need to ensure that the minimum controls articulated in the policy are working or to identify any gaps and provide an action plan for remediation

Additionally, the [REDACTED] are responsible for providing appropriate and timely reporting to the [REDACTED] and the Audit, Risk and Compliance Committee as required.

The Audit, Risk and Compliance Committee are responsible for approving the Policy and overseeing compliance.

The Board is responsible for setting Post Office's risk appetite.

7 Document control

7.1 Document control record

Summary

GE policy sponsor	Standard owner	Standard implementer	Standard approver
Martin Roberts (Group Chief Retail Officer)	[REDACTED]	[REDACTED]	R&CC/ARC
Version	Document review period	Policy – effective date	Policy location
4.0	Annual	05/2024	Postmaster Support Policies [REDACTED]

Revision history

Version	Date	Changes	Updated by
0.1	22nd January 2021	Draft Version	[REDACTED]
0.2	22nd January 2021	Initial review	[REDACTED]
0.3	25th January 2021	Minor revisions to draft	[REDACTED]
0.4	1st February 2021	Additional risk added on training. Additional principle. Footnote to define postmasters in this policy. Minor text corrections.	[REDACTED]
0.5	25th February 2021	New principles about case closure and postmaster satisfaction added to 2.3. Postmaster support policy list updated.	[REDACTED]
0.6	8th March 2021	Amended risk appetite statements.	[REDACTED]
0.6.1 and 0.6.2	9th and 19th March 2021	Amendments following operational review.	[REDACTED]
1.0	30th March 2021	Final Version approved by ARC.	[REDACTED]
1.1	26th April 2021	Minor text amendments for alignment to postmaster support policies	[REDACTED]
1.2	4th May 2021	Risk appetite amendment	[REDACTED]
1.3	25th May 2021	Added linked policy statement to front page Added reference to the Group Investigations Policy to section 3.3 Who Must Comply? Updated link to section 5.1 Added footnotes to link to other policies referred to in this policy.	[REDACTED]
1.4	14 th February 2022	Annual Review 1.1 Amended Postmaster definition	[REDACTED]

		<p>2.2 Addition of section stating that a postmaster may authorise someone to act on their/its behalf</p> <p>3.1 Updated risk appetite statements to include Operational statements</p> <p>[REDACTED]</p> <p>4.3 Changed the Whistleblowing examples in the table</p>	
2.0	1st April 2022	Amended version number following approval	[REDACTED]
2.1	4th July 2022	2.1, 3.4, 5.3, 6.1, 7.1 – updated owner and sponsor Rebranded policy.	
2.2	4th October 2022	Annual Review Throughout – ‘Whistleblowing’ references changed to ‘Speak Up’	
3.0	5th December 2022	Updated to full version number following approval at ARC	
3.1	19th June 2023	Updated owner [REDACTED]	
3.2	8th December 2023	Updated owner 3.1 Amended risk exception statement 3.2 Updated framework policy name – Contract Termination Decisions Review	
3.3	15th March 2024	Annual Review Updated Whistleblowing Policy to Speak Up Policy 2.3 Amendment of last two principles to reflect the workings of the new Postmaster Experience Forum 2.5 Risks updated to reflect [REDACTED] 3.4 Retail Committee replaced with Postmaster Experience Forum 3.5 Minimum Control Standards changed to Policy Required Operational Standards 4.2/4.3 Additional sections on Service Levels and Executive complaints 4.4 Removal of paragraph referring to persuasive factors found in the Investigations Policy (policy being rewritten) [REDACTED] 4.8 Update on case closure process 5.2 Addition of Speak Up and NFSP contact details	
4.0	21st May 2024	Updated to full version number following approval at ARC	

7.2 Oversight committee

Oversight committee: Risk and Compliance Committee and Audit, Risk and Compliance Committee

Committee	Date approved
POL R&CC	7 th May 2024
POL ARC	21 st May 2024

Next review: 31 MAY 2025

7.3 Company details

Post Office Limited and Post Office Management Services Limited are registered in England and Wales. Registered numbers 2154540 and 08459718 respectively. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

Post Office Management Services Limited is authorised and regulated by the Financial Conduct Authority (FCA), FRN 630318. Its Information Commissioners Office registration number is ZA090585.

Post Office Limited is authorised and regulated by Her Majesty's Revenue and Customs (HMRC), REF 12137104. Its Information Commissioners Office registration number is Z4866081.

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