



Date  
10 November 2025

Post Office  
100 Wood Street  
London EC2V 9ER

Your Ref:

Classification:  
Public

Dear [REDACTED],

## Freedom of Information Request – FOI2025/00554

We are writing in response to your email received by Post Office Limited (**"Post Office"**) on 06 August 2025, 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 could you provide the 2025/2026 NFSP Annual Plan & Approved Project details as required in the Grant Framework Agreement Clause 4.5 & Clause 9."**

We can confirm that Post Office does hold the information you requested, however, some information within the NFSP 2025/2026 Annual Plan and the whole of Grant Specific Project 2025-26 document is being withheld as it falls under the s43(1) & s43(2) exemption which relates to information which would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it). We have also withheld the Executive Structure under s40(2) & 40(3A) personal information. In applying these exemptions, we have had to balance the public interest in withholding the information against the public interest in disclosure.

Please find attached a copy of the 2024/25 NFSP Annual Plan. However as explained above we have withheld the Executive Structure at point 1.2 of the Annual Plan. We have decided that this information should be withheld under sections 40(2) & 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 executive members are such a small team that disclosing these roles/and or names would make people identifiable, disclosure would also not be 'fair'; e.g. if the information relates to junior employees who are not public facing. The National Federation of Subpostmasters ("NFSP" staff involved would not reasonably expect their details to be disclosed in relation to this request for information.

The remainder of the information in the Annual Plan has been redacted under sections 43(1) & 43(2) commercial interests. In applying this exemption, we recognise that there is a public interest in disclosure of information concerning details of the NFSP as this helps promote transparency in Post Office business and reassurance about the way public money is being spent.

However, disclosure of this information would likely prejudice the commercial interests of the NFSP which is a national non-profit organisation and the official representative body for Postmasters operating in a competitive environment. The NFSP is the trade association and membership organisation which represents Postmasters. Postmasters are independent business people who act as agents to Post Office and run the majority of Post Offices.

There is a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of Post Office and third parties. This is because disclosing information about the NFSP Strategic plans, and how they will be providing support, focus and upskilling for Postmasters, details of their support teams and the cost to the NFSP of providing commercial membership benefits and internal financial data could undermine its position and advantage to other competing organisations, as they do not publicly disclose their operational budgets or membership figures, nor are they subject to any details being disclosed due to the FOIA. These details are also not required in their Annual Reports or Financial Statements, which are available via Companies House: <https://www.gov.uk/get-information-about-a-company>.

There is a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of NFSP. This is because disclosing information comprised of a breakdown of the NFSP's operating expenditure would allow competitor organisations to use or even to replicate the NFSP's operating model. This is something the NFSP have designed and developed on behalf of its members and have a strong interest in ensuring that competitors cannot replicate their model.

While the overall funding limit is in the public domain, information about the NFSP's actual operating costs, model and breakdown of how that funding is allocated within the NFSP is not.

In order to be helpful, we draw your attention to the Post Office Consultative Council, established in January 2025 to inform its strategic direction. This council includes representatives from organisations representing Postmasters, Post Office's postmaster non-executive directors, and Post Office leadership. Its remit includes strategy, culture, funding, and governance. More information is available on the Post Office Corporate Blog webpage:

[https://corporate.postoffice.co.uk/en/blogs/2025\\_02/postmasters-inform-strategic-direction-of-post-office-as-part-of-new-council/](https://corporate.postoffice.co.uk/en/blogs/2025_02/postmasters-inform-strategic-direction-of-post-office-as-part-of-new-council/).

In conclusion, while we recognise the public interest in transparency, we believe that disclosing the withheld information would be detrimental to the NFSP's ability to operate fairly and competitively and would breach personal information. Therefore, the exemptions under sections 43(1), 43(2), 40(2) and 40(3A) has been applied.

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

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)**