



Area of Code	Non-conformity	Recommendation of steps to be taken	Action
<p>Section 8.5 – compliance statistics</p> <p>Section 8.5 of the Code sets out that “public authorities with over 100 Full Time Equivalent (FTE) employees should, as a matter of best practice, publish details of their performance on handling requests for information under the Act.”</p>	<p>The Post Office does not currently publish its compliance statistics.</p>	<p>The Commissioner understands that the Post Office has undertaken a review of the publication scheme and from quarter 2 of this financial year, the Post Office has committed to publishing its compliance statistics.</p> <p>The Post Office should publish it’s compliance statistics from quarter 2 of this financial year onwards, and signpost the Commissioner to this information as soon as its published.</p>	<p>Publish FOIA timeliness statistics on the Post Office corporate website</p> <p>Re-assess and explore whether what we have published could be improved from a clarity perspective i.e., table vs chart vs what other Public Authorities disclose.</p>
<p>Part 4 – time limits for responding to requests</p> <p>Section 4.1 of the Code highlights the “clear” requirement that public authorities respond to requests for information promptly, and within 20 working days of receipt in accordance with section 10(1) of FOIA.</p> <p>Section 4.4 of the Code states that public authorities may exceed the 20 working day deadline if additional time is required to consider the public interest.</p> <p>Section 4.5 of the Code states that an extension is permitted “until such time as is reasonable in the circumstances”, taking account, for example, of where the information is especially complex or voluminous, or where a public authority needs to consult third parties.</p> <p>Section 4.6 of the Code advises that it is best practice for an extension to be no more than a further 20 working days although a longer extension may be appropriate depending on the circumstances of the case, including the complexity and volume of the material.</p> <p>Section 4.7 of the Code makes clear that when a public interest test extension is required, the public authority must inform requestors which exemption or exemptions it is relying on.</p>	<p>As noted, the Post Office’s compliance is directly affected by external factors such as the statutory inquiry and peaks of media interest.</p> <p>Whilst the Post Office was able to bring up its compliance from 52% to 90% in six months, it took much less time for its compliance to fall back down to 50%.</p>	<p>The Post Office should use the Commissioner’s FOI self-assessment toolkit to improve its timeliness compliance.</p> <p>The Post Office should publish its action plan, which incorporates any recovery plan already in development, with appropriate processes put into place to ensure 90% timeliness is achieved by 31 December 2024.</p> <p>Once the Post Office has published its action plan, it should signpost the Commissioner to this information.</p> <p>This action plan should be supported by a ‘lessons learned’ exercise, which examines the root cause of delays from allocation through to clearance at different stages, with mitigations for any recurring problems addressed specifically in the plan.</p> <p>The Post Office should analyse and review its current request handling procedures to ensure that it has adequate long term resources in the right areas. Its systems and procedures need to be able to cope with sustained increased volumes owing to increased scrutiny of the Post Office as a result of the statutory inquiry. The Post Office shouldn’t solely rely on recruitment to meet any increase in FOI requests, in</p>	<p>Consult the self-assessment toolkit at: https://ico.org.uk/for-organisations/foi/foi-self-assessment-toolkit/</p> <p>Ensure the 4 stages of the ICO toolkit are embedded into the policies and procedures</p> <p>Publish the FOIA Action Plan on the Post Office corporate website</p> <p>Notify Strategic Executive Group of the FOIA Action Plan and ensure monitoring by the Risk and Compliance Committee</p> <p>Notify the ICO of the FOIA Action Plan publication</p> <p>Carry out lessons learned exercise to determine the root causes of the issues and add any suggestions and mitigations into the FOIA Action Plan</p> <p>Present lessons learned document to the FOI SteerCo and summarise to RCC.</p> <p>Post Office has documented FOIA processes and procedures.</p> <p>These should include escalation points and service level agreements with business areas, and the Quality Assurance function.</p>

ICO Practice Recommendation – Post Office Action Plan



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		<p>case this isn't possible in the future. The Post Office's action plan should include how to deal with sustained periods of increased volumes of information requests.</p> <p>The Post Office's request handling procedures should include provision for when a response is late, or is likely to be late at any stage of the internal processes. Its procedures should make clear when and where to escalate a matter, who is responsible for taking action, the action they will need to take, and by when.</p>	<p>Publicise FOIA process flowchart on the Hub, for wider information with colleagues across Post Office.</p> <p>Promote awareness and cross functional support by publishing regular updates on the Hub (at least 6 monthly)</p>
		<p>The Post Office should ensure that it has adequate levels of resource within its Information Rights teams to ensure that FOI requests, and internal reviews, are processed in a timely manner.</p>	<p>Examine the core purpose of FOI SteerCo and revise the Terms of Reference accordingly</p> <p>Secure funding for resource, go out to recruitment and employ new FOIA Team members</p>
		<p>The Post Office should also ensure that staff within its various departments responsible for request handling are also aware of the importance of processing requests in a timely manner.</p>	<p>Ensure mandatory annual Data Protection Compliance training module includes section raising awareness of FOIA</p> <p>Obtain percentage completion by Post Office employees</p> <p>Work with the business to ensure each area has a point of contact and identify escalation route for any blockers</p>
		<p>The Post Office must ensure that its information rights training is sufficient to ensure that it has adequate coverage in place in order that request handling times do not fall below a compliant level in the event of the departure of key staff members.</p>	<p>Ensure onboarding of FOIA staff includes training to cover processes, use of eCase and an understanding of how Post Office works</p> <p>Provide opportunity for team members to ask questions to ensure continuous learning and meet regularly to share any best practice advice</p>
		<p>The Post Office should also consider requesting a consensual audit of its FOIA policies, practices and procedures from the Commissioner.</p>	<p>Liaise with Internal Audit to see when they can carry out an audit of FOIA policies, practices and procedures</p> <p>Subject to Internal Audit work, contact ICO with appropriate timescale to carry out any further audit</p>