

[REDACTED]

Date  
20 January 2025

[REDACTED]

[REDACTED]

Post Office  
100 Wood Street  
London EC2V 9ER

Your Ref:

**Classification:**  
Public

Dear [REDACTED],

## Freedom of Information Request – FOI2024/00547

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**”). Thank you for your patience whilst we have been considering the public interest, following a series of extension emails the latest of which was sent on 17 January 2025.

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

**“I am aware that the report of an investigation into financial irregularities in the affairs of one or more Non Executive Directors was submitted to Henry Staunton, Nick Read, and I assume others, before Mr Staunton left the business.**

**This was referred in papers in the context of the recent work of the House of Commons Select Committee following Mr Staunton’s departure. I understand the investigation was given its own name, Project Venus.**

I would be grateful if you could:

- 1. Provide me with a copy of the investigation report, bearing in mind the overriding public interest in ensuring the highest standards of probity in the governance of Post Office Ltd, a publicly owned company, especially in the wake of the Horizon Scandal**
- 2. Provide me with a copy of any summary, or edited/redacted version, of that report**

3. **Provide me with the covering emails which show who the first internal recipients of the report were (including names at senior level)**
4. **Provide me with the covering emails which show any subsequent distribution of the report which presumably includes all members of the Board (including names at senior level)**
5. **Provide me with the emails showing the sharing of that report with UKGI and the Department for Business & Trade (including names of originators, recipients and copy addressees at senior levels)**
6. **Provide me with any disclosure of the fact of the investigation as may be required by Government as Post Office's single shareholder or by law and regulation"**

We can confirm that Post Office does hold some of the information you have requested and have answered each question in turn below.

1. **Provide me with a copy of the investigation report, bearing in mind the overriding public interest in ensuring the highest standards of probity in the governance of Post Office Ltd, a publicly owned company, especially in the wake of the Horizon Scandal**

Please see the attached document titled, "FOI2024\_00547 - Attachment 1". It is the closure report on Project Venus, issued after the final report and is Post Office's official act on the final report, which brought Project Venus to a close.

2. **Provide me with a copy of any summary, or edited/redacted version, of that report**

We do not hold a summary or an edited version of the report.

3. **Provide me with the covering emails which show who the first internal recipients of the report were (including names at senior level)**

Please see the attachments titled, "FOI2024\_00547 - Attachment 2" and "FOI2024\_00547 - Attachment 3".

4. **Provide me with the covering emails which show any subsequent distribution of the report which presumably includes all members of the Board (including names at senior level)**

Please see the two documents attached titled, "FOI2024\_00547 - Attachment 4" and "FOI2024\_00547 - Attachment 5".

**5. Provide me with the emails showing the sharing of that report with UKGI and the Department for Business & Trade (including names of originators, recipients and copy addressees at senior levels)**

We do not hold information within scope of this part of your request.

**6. Provide me with any disclosure of the fact of the investigation as may be required by Government as Post Office's single shareholder or by law and regulation**

We do not hold information within scope of this part of your request.

We have withheld some information within the disclosable documents under FOIA exemptions. Section 31(1)(a) is engaged because providing the relevant information would likely prejudice the prevention of crime by facilitating the possibility of a criminal offence being carried out. Further, all information in respect of which a claim to legal professional privilege could be maintained has been withheld under section 42(1) of the FOIA. Finally, some of the information you have requested, including the final report on Project Venus, is being withheld as it falls under the exemption in section 43(2) of the FOIA, which relates to information which would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

Sections 31(1)(a), 42(1) and 43(2) are subject to a public interest test, which means 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 held by Post Office, as this enhances transparency about the ways of working within Post Office. We also recognise that there is a public interest in disclosure of information concerning details of general Post Office business, including its relationship with third parties as this helps to promote transparency in Post Office business and reassurance about the way public money is being spent. On the other hand, there is a strong public interest in withholding security-sensitive information concerning certain technical operational mechanisms at Post Office as the information held within them could be used as the basis of criminal activity / a

cyber-attack to try and obtain the information by nefarious means. Disclosure of the information would be likely to prejudice the prevention of such a crime. Further, Post Office notes, in particular, the strong inherent public interest in preserving legal privilege which it considers, in all the circumstances, outweighs the public interest in disclosure.

There is also a strong public interest in withholding certain information we have identified as it would, if disclosed, prejudice the commercial interests of Post Office and / or third parties. This is because disclosing information about Post Office's commercially sensitive information, or that of its third-party associates would prejudice Post Office's commercial interests or those of third parties as members of the public could exploit such information to gain unfair commercial advantage over Post Office and / or its third-party associates. It would not be in the public interest to disclose information if Post Office or a third-party associate would be unable to operate in a fair marketplace regarding the competitive dialogue procedure and are commercially damaged by the release of the information.

Finally, we have decided that some of the information should be withheld under sections 40(2) and 40(3A) of the FOIA as it 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 Post Office staff involved would not reasonably expect their names, roles and contact details to be disclosed in relation to this request for information.

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)**