



[REDACTED]

Date  
15 November 2024

[REDACTED]  
[REDACTED]

Post Office  
100 Wood Street  
London EC2V 9ER

Your Ref:

**Classification:**  
Public

Dear [REDACTED],

## Freedom of Information Request – FOI2024/00385

We are writing in response to your email received by Post Office Limited (“**Post Office**”) on 26 January, which has been dealt with under the terms of the Freedom of Information Act 2000 (“**FOIA**”). We sincerely apologise for the delay in our response.

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

**“Please provide copies of the [Payzone] Board minutes for the last ten Board meetings of the Company for which approved minutes are available.**

**Meetings of committees of the Board are outside the scope of this request.”**

We can confirm that Post Office does hold the information you have requested, and we have provided the documents with this response letter.

We have withheld some of the information under the FOIA exemptions at section 31(1)(a), relating to law enforcement; section 42(1), relating legal professional privilege; and section 43(2), relating to commercial interests. These are all qualified exemptions and therefore 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 the Payzone Board Meeting minutes, as these help promote transparency within the wider Post Office business and reassurance about the way public money is being spent.

However, there is a high public interest in ensuring that the most senior members of Post Office can have free and frank conversations. Some discussion includes information that relates to cyber security and, therefore, falls under the exemption in section 31(1)(a) of the FOIA. This exemption is engaged because providing the information will prejudice the prevention of crime by facilitating the possibility of a criminal offence being carried out. There is a strong public interest in withholding information concerning internal Post Office systems as disclosure of this could be used as the basis of a cyber-attack to try and obtain information for nefarious means. Disclosure of the information would prejudice the investigation of any incidents of criminal activity if it were to occur.

Regarding section 42(1) of the FOIA, Post Office is satisfied that the public interest in maintaining the exemption by withholding the privileged information outweighs the public interest in disclosing it. In reaching this conclusion Post Office has considered a variety of factors for and against disclosure, including the public interest in transparency outlined above. Against these factors 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.

The information that falls under the exemption in section 43(2), relates to information which would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

There is a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of Post Office. This is because disclosing sensitive commercial discussions between the Group Chief Commercial Officer and the Finance Director regarding Post Office business would prejudice Post Office's commercial interests. Disclosure of this would allow Post Office's competitors to better understand how the business works and see what potential strategies are in train to improve Post Office's commercial impact within the marketplace. This exemption also includes protecting Post Office's reputation from harm, as disclosure of the information could cause damage to the brand, worsen

relationships with postmasters and weaken Post Office's position in a very competitive marketplace.

We have also withheld some information under sections 40(2) and 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 information either relates to personal matters about individual Post Office employees or refers to junior staff members. In both these instances, all parties would not expect their personal data to be disclosed under this FOIA request.

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)**