



Information Rights Team
Post Office Limited
Ground Floor
Finsbury Dials
20 Finsbury Street
London EC2Y 9AQ

Your reference:
Our reference: FOI2022/00081

Craig

request-826438-f08f60ae@whatdotheyknow.com

23 February 2022

Dear Craig,

Freedom of Information Request – FOI2022/00081

I am writing in response to your email dated 26th January 2022 received by Post Office Limited (“**Post Office**”), which has been dealt with under the terms of the Freedom of Information Act 2000 (“**FOIA**”).

In your email you have requested the following information:

Please can you provide me with the individual amounts for the top 100 earning offices for December 2021. This is for transactions paid in January 2022 including branches with outreach offices attached to them.

Also, can you provide the top 100 earning offices including where outreaches are attached for the previous 12 pay dates from January 2022.

I can confirm that we do hold the information you have requested.

However, Post Office considers that the information you have requested engages the following exemptions under the Freedom of Information Act: section 31(1)(a) – prevention or detection of crime, section 38(1)(b) endanger the safety of any individual and section 43(2) likely prejudice or harm commercial interests. We also consider that section 40(2) and section 40(3A) (a), relating to personal data is also engaged.

Post Office considers sections 31(1)(a) and 38(1)(b) are engaged as should we list the top 100 earning branches it could alert criminals to target either a particular branch, group of branches or individuals and as such this targeting could result in actual physical harm and criminal activity. Our employees, Postmaster's and their staff would expect Post Office to withhold the information that would endanger their safety whilst carrying out their work. Section 43(2) is engaged as Post Office considers the information could also prejudice commercial interests by listing branches' remuneration which could cause harm to Post Office by enabling Post Offices competitors to use the information to their advantage in deciding where to locate their competitive businesses, even if that business is only a partial competitor which offers some similar services.

The exemptions under sections 31(1)(a), 38(1)(b) and 43(2) of the FOI Act are all qualified exemptions, which requires Post Office to carry out a public interest test. Post Office has considered the public interest in disclosure, which includes being open and providing transparency to the general public. Disclosure would also further the public understanding of how Post Office operates.

However, there is a clear public interest in protecting society from the impact of crime. Post Office believes that releasing this information would endanger Postmasters, their staff and our employees. We believe there is a strong public interest in protecting the safety of individuals and disclosure of details about the top earning offices, and how much they earned in a specific period, would potentially allow criminals to target specific branches. This criminal activity could endanger those who work in these branches, along with any customers present.

Post Office has also considered the public interest in preserving their ability to compete in a commercial environment, including protecting its relationship with third parties. Providing the financial information, you have requested relating to branches, would be likely to give Post Office's competitors a commercial edge, including locating competitive businesses. This would have a detrimental effect on both Post Office and the Post Master's business.

Section 40(2) and section 40(3A)(a) FOIA provide that any information to which a request for information relates is exempt information if it constitutes personal data and the disclosure of that personal data to a member of the public otherwise than under the FOIA would contravene any of the data protection principles (set out in Article 5(1) of the GDPR (Section 40(7) of the FOIA)). Post Office considers that releasing financial information relating to specific branches could help identify individuals who have a reasonable expectation that their data would not be published. Disclosure to you would contravene the 'lawfulness, fairness and transparency' principle set out at Article 5(1)(a) of the UK GDPR. Post Office considers that it has no lawful basis on which to disclose to you the exempted personal data since none of the lawful bases listed under Article 6(1) of the UK GDPR are available to it.

We believe, therefore, that the public interest lies in maintaining the exemptions and withholding the requested information.

I am sorry I could not provide you with the information you requested on this occasion, however 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 stating your reasons for your internal review request.

Yours sincerely,

Liesl Jackson
Information Rights Team
information.rights@postoffice.co.uk

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