



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

Your reference:  
Our reference: FOI2020/00021

Eleanor Shaikh

request-718442-f4d15483@whatdotheyknow.com

10 February 2021

Dear Eleanor Shaikh,

### **Freedom of Information Request – FOI2020/00021**

I am writing in response to your request received by Post Office Limited ("**Post Office**") on 15 January for information under the Freedom of Information Act 2000 ("**FOIA**"), as set out below:

*"In April 2017 a report was issued on a Credence upgrade led by Mick Mitchell and Rob Horton. It indicates that in the prior three months stability of the system had been increased, substantially reducing the known incidents and outages which POL experienced for at least the previous year.*

*Please can you release this report along with any reports of the preceding 18 months which identify the issues POL was experiencing with Credence, including risk assessments of their impacts, their mitigations and reasons why the 2017 upgrade was postponed on more than one occasion."*

I confirm that Post Office holds information responsive to your request. However, it is estimated that the cost of complying with your request would exceed the "appropriate costs limit" and Post Office is not obliged to process your request in these circumstances by virtue of section 12 of FOIA. Please therefore treat this letter as a refusal notice.

I set out our reasons for this decision in further detail below.

#### **Reasons for this refusal notice**

Our understanding is that you are requesting the following:

1. a copy of a report issued in April 2017 on a Credence upgrade led by Mick Mitchell and Rob Horton which indicated that in the prior three months stability of the system had been increased, substantially reducing the known incidents and outages which Post Office experienced for at least the previous year ("**Request 1**"); and
2. any reports from the 18 months which preceded the report referred to in (1) that identified the issues Post Office was experiencing with Credence, including risk assessments of their impacts, their mitigations and reasons why the 2017 upgrade was postponed on more than one occasion ("**Request 2**").

We have **aggregated** Request 1 and Request 2. Post Office is permitted to aggregate "two or more requests"<sup>1</sup> under The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 ("**Fees Regulation**") where the requests:

- (i) are made by one person, or by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign;
- (ii) are received within any period of 60 consecutive working days; and
- (iii) relate to any extent, to the same or similar information.<sup>2</sup>

We consider that these conditions are satisfied here as (i) you made Request 1 and Request 2; (ii) Request 1 and Request 2 were each made on 15 January in a single item of correspondence; and (ii) Request 1 and Request 2 are of a similar nature as they each relate to Post Office's Credence system.

Where requests are aggregated, Post Office can regard the estimated cost of complying with any one of the requests to be the estimated **total cost** of complying with all of them for the purpose of considering whether complying with the request would exceed the "appropriate cost limit" which is referred to in section 12(1) of FOIA.

The "appropriate cost limit" for Post Office is £450.<sup>3</sup> When estimating costs for the purpose of this limit, the rate of £25 per person per hour is used<sup>4</sup> and so £450 represents the cost of one person at Post Office carrying out 18 hours of work. However, the 18 hours of work can only relate to carrying out the following "permitted activities" in complying with the request:<sup>5</sup>

- (i) determining whether the information is held;
- (ii) locating the information, or a document containing it;
- (iii) retrieving the information, or a document containing it; and
- (iv) extracting the information from a document containing it.

We estimate that to search through our records in order to locate the information, or documents containing it, and extract the requested information from our records given the volume of documents involved in Request 2 would take significantly longer than 18 hours. In response to your request, we conducted some preliminary searches and enquiries, including with our IT Director. From this, we understand that the information you have requested would be contained in records that cover a number of topics (i.e. more than just the topic referred to in Request 2). Bearing this in mind, our preliminary searches on Post Office's email archive system returned over 800,000 results using the keyword "Credence" for the period requested and over 75,000 results using the keyword "Credence" in combination with "upgrade" or "risk" for the same period. Each of these documents would need to be reviewed and any relevant information extracted. Post Office would clearly be unable to do so within 18 hours.

As Post Office estimates that the "appropriate costs limit" would be exceeded in respect of Request 2, we are not obliged to process your request further in accordance with section 12 of FOIA. As Request 2 has been aggregated with Request 1 (as

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<sup>1</sup> The Guidance from the Information Commissioner's Office ([https://ico.org.uk/media/for-organisations/documents/1199/costs\\_of\\_compliance\\_exceeds\\_appropriate\\_limit.pdf](https://ico.org.uk/media/for-organisations/documents/1199/costs_of_compliance_exceeds_appropriate_limit.pdf)) at paragraph 42 explains that "multiple requests within a single item of correspondence are separate requests for the purpose of section 12".

<sup>2</sup> See regulation 5 of the Fees Regulations.

<sup>3</sup> See regulation 3(3) of the Fees Regulations.

<sup>4</sup> See regulation 4(4) of the Fees Regulation.

<sup>5</sup> See regulation 4 of the Fees Regulations.

explained above), this also means that we are entitled to decline to process Request 1 in accordance with section 12 of FOIA as well.

We may be able to provide information requested if you reduce or refine your requests to bring the cost of compliance under the limit. For example, Request 2 as currently worded is very broad ("any reports") and covers a lengthy period of time (18 months). You might wish to consider narrowing this request to particular types of documents, for example, by excluding email correspondence, as well as limiting the timeframe to a shorter period.

Should you choose to submit a refined request, Post Office will treat this as a new request for information and consider it in accordance with FOIA, including whether any exemptions apply.

If you have any queries about this response, please contact me. Do remember to quote the reference number above in any future communications.

I hope the information I have provided on this occasion is useful, 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 below stating your reasons for your internal review request.

Information Rights Manager  
Post Office Limited  
Information Rights Team  
Ground Floor  
Finsbury Dials  
20 Finsbury Street  
London  
EC2Y 9AQ  
[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  
<https://ico.org.uk>

Yours sincerely,



Jackie Lawrence  
Information Rights Team  
[information.rights@postoffice.co.uk](mailto:information.rights@postoffice.co.uk)  
@postofficenews

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