

11 February 2013

Royal Mail Group

Mrs T Begum

By Email: request-142010-ab578cd9@whatdotheyknow.com

Information Rights Team
(Freedom of Information Act)
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Dear Mrs Begum

Re: Freedom of Information Act Request (Our Reference: KFEN-92WFQX)

I am writing in response to your email dated 14 January 2013 concerning one of your recent requests for information from Royal Mail. You requested an internal review of our handling of the request which you submitted on 12 December 2012. We have therefore carried out a review of our handling of this request in line with the Freedom of Information Act and the associated Code of Practice.

In your email dated 12 December 2012 you requested information in eight parts. In Royal Mail's response of the 11 January 2013, the relevant information held by Royal Mail Group was withheld under sections 31 and 43 of the FOI Act. We have now reviewed each part of your request and the decision to withhold some information. We will address each part of your request below.

Your request refers to 'Registered Mail'. We explained in our original response that Royal Mail does not provide a service called Registered Mail. However, based on the questions that you asked this was understood to mean Royal Mail's Special Delivery service. In your email of the 14 January you confirmed this stated that you deem it to be 'imperative to know how my special delivery is handled'.

- 1. 'Can you summarise the Royal Mail guidelines, in place after Registered Mail has been collected by collection staff and brought back to their respective offices?'**

It is important to say that the Freedom of Information Act applies to recorded information held by Royal Mail. Part 1 of your request would relate to detailed operational procedures and security management procedures which Royal Mail staff are required to follow. These

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are detailed and lengthy documents and we do not hold a summary of the procedures set out within them. Further, we do not believe that it is reasonably practicable to create a summary of these procedures. Your request would actually cover a large amount of detailed information – all procedures for processing, transport and delivery of Special Delivery items would be covered by this request. I can confirm that Special Delivery items are required to be processed in a secure area, Special Delivery enclosures must be to the correct security standard and security procedures must be followed for the transfer of Special Delivery items.

As stated above information about how to handle Special Delivery items following collection, and how to manage security, is set out within documented operational procedures. We do not believe that it would be appropriate to release these procedures outside of Royal Mail. If specific procedures were requested, we would be minded to withhold them under sections 31(1) and 38(1) of the Freedom of Information (FOI) Act on the basis that their disclosure would prejudice security arrangements and in turn place the safety of our people at risk from potential criminal activity. We believe that the section 43(2) of the FOI Act would also be likely to apply to the operational procedure for Special Delivery on the basis that this information would be likely to be utilised by rival postal operators who would not be required to reveal equivalent information about their own express delivery products. However, we do not believe that it is appropriate to apply these exemptions to this request because you asked only whether it was possible to provide a summary of information.

2. 'Does the Royal Mail guidelines stipulate, for the mail to be held in a secure area/room under lock and key, restricted from unauthorised staff?'
3. Does the Royal Mail guidelines stipulate, when the area/room is left unattended, no unauthorised persons should be able to access the secure area/room?
4. Can you tell me, is collected Registered Mail held in a secure area/room under lock and key at Whitechapel Delivery Office, 206 Whitechapel Road, Whitechapel, London, E1 1AA?

I can confirm that Special Delivery items are required to be held in a secure area with restricted access. This is the case at Whitechapel Delivery Office. I can also confirm that there is restricted access to the Delivery Office itself as with all Royal Mail sites.

As stated above, we do not believe it would be appropriate for detailed operational procedures, and security requirements set out within them, to be released outside of Royal Mail. If you wish to request a copy of these procedures we would be minded to withhold them under sections 31 and 38 of the FOI Act. However, I hope that the response provided in this letter suitably answers your questions.

5. Can you tell me between 01/08/2012 and 10/12/2012, how many times have unauthorised Royal Mail staff and non Royal Mail contracted staff, gained

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unsupervised access to the secure area/room at, Whitechapel Delivery Office, 206 Whitechapel Road, Whitechapel, London, E1 1AA? If no records exist, please can you explain why not?

6. If your unable to provide an exact number of occasions the security has been breached, have unauthorised person gained access to this area between 01/08/2012 and 10/12/2012? (a simple yes or no answer will suffice)

After reviewing this part of your request, we believe that it is appropriate to withhold any relevant information under section 31(1) of the FOI Act. This is because disclosing details of any physical security breaches into the public domain could increase the risk of criminal activity at this and other Royal Mail sites. Disclosure of the information would therefore be likely to prejudice the prevention of crime. It is important to stress that the answer to questions 5 and 6 could be 'O' and 'No' respectively. However, we believe it is appropriate to neither confirm nor deny whether any such incidents are recorded in line with section 31(3) of the Act.

Section 31 of the FOI Act is subject to the 'public interest test' and we have therefore considered the balance of public interest in the information. Whilst there is public interest in the provision of mail services it is important to say that the Special Delivery service is a commercial product on top of the core daily delivery services provided by Royal Mail as the universal service provider. There is of course consumer interest in the provision of this service for Special Delivery customers. However we believe that this interest is met through the publication of product details and terms & conditions for users: <http://www.royalmail.com/personal/uk-delivery/special-delivery>

It is also important to note that the integrity of mail services is regulated by the postal regulator Ofcom. We believe that the public interest in security of the post is therefore met by the existing regulatory framework and that the interests of the wider public would not be served by the disclosure of security information for a single local Delivery Office. Any interest in disclosure must be balanced against the strong public interest in ensuring that Royal Mail is able to maintain security and do everything possible to protect the integrity of mail services and the safety of its employees. It would clearly not serve the interests of the public to increase the possibility of attempted theft of mail or place Royal Mail and its employees at risk. We believe that any limited public interest in information relating to this particular office is outweighed by the interest in ensuring that the mail carried through this and other offices is safe and secure.

7. Can you describe the secure area/room, and how the Registered Mail is secure when the secure area/room is left unattended?

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This is not recorded information held by Royal Mail. The FOI Act does not require us to provide a physical description of an area if it is not already recorded. As stated above, all Special Delivery items are required to be held in a secure area with restricted access.

8. How many Registered Mail items, have been lost; posted in the E1, E2, E5, E8 and E9 areas (London), that had been processed at Whitechapel Delivery Office, 206 Whitechapel Road, Whitechapel, London, E1 1AA, between 01/08/2012 and 10/12/2012?

As explained in our original response, we do not hold this information. It would be possible to identify loss complaints for SD items posted in E1, E2, E5, E8 and E9 but it is not possible to extract from our system complaints relating to items which had been processed at Whitechapel DO. Royal Mail already publishes details of complaints that it receives both annually and within quarterly Quality of Service reports which can be found on our website www.royalmailgroup.com.

I hope that this response is helpful to you. I am sorry that we cannot provide answers to all of your questions. In the event that you are not satisfied with this reply, you also have a right to appeal to the Information Commissioner who can be contacted at the address below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Telephone: 01625 545 700
www.informationcommissioner.gov.uk

Yours sincerely

Colin Young
Head of Information Rights
Company Secretary's Office