

Postmaster support policy

Onboarding

Version 4.1



Post Office is determined to reset its relationship with postmasters and has introduced policies that set out guidelines on how Post Office should support postmasters, specifically for use across twelve areas.

The policies stand on their own but should be reviewed in conjunction with each other. Support teams should have an awareness of all twelve policies and how they link together.

The twelve Postmaster Support Policies are listed in section 2.2 of this policy and can be found [on the hub, here](#).

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1 Overview

1.1 Introduction by the policy owner

The Retail Engagement Director has overall accountability to the Board of Directors for the design and implementation of controls and supporting protocols to ensure postmasters¹ are onboarded in line with applicable regulatory requirements and contractual obligations, creating an overall positive onboarding experience for potential new postmasters (including Banking Hub operators given that these are appointed from existing postmasters).

This policy is a non-contractual document provided for information. It does not form part of the contract between any postmaster and Post Office².

1.2 Purpose

This policy is part of a framework that has been established to capture the minimum operations onboarding standards required relating to the initial onboarding of postmasters and their teams.

It is one of a set of policies that provide a clear framework for Postmaster Onboarding. Compliance with these policies supports the Post Office in meeting its business objectives and responsibilities to postmasters.

1.3 Core principles

Post Office intends to provide a postmaster onboarding process that attracts and appoints the best possible potential new postmasters to reduce network³ churn, attrition and enables Post Office to maintain a stable and sustainable network. It therefore supports the long-term commercial viability of the Post Office.

Post Office will deliver postmaster onboarding in good faith with fairness, transparency, and professionalism (being the underpinning behaviours of Post Office).

It is essential that potential new postmasters and their teams are given the right levels of support throughout the onboarding journey. This will help Post Office lay the foundations for a sustainable, collaborative and transparent future partnership.

Post Office will evaluate all onboarding feedback received from postmasters and their teams and take relevant corrective actions agreed.

¹ In this policy "postmaster" refers to a limited company, partnership, limited liability partnership, other entity or individual that contracts with Post Office for the operation of a Post Office® branch.

² In this policy, "Post Office" means Post Office Limited.

³ In this policy, "network" means branches not directly managed by Post Office.

1.4 Application

This Policy is applicable to all Post Office employees⁴ that manage postmaster onboarding processes defines the minimum standards to control financial loss, postmaster impact, regulatory breaches and reputational damage in line with the Post Office's Risk Appetite. The policy applies to postmasters who are onboarded and appointed as a postmaster (regardless of what contract type they will have with Post Office and what Post Office model type they will operate) from when the postmaster submits an initial application through to appointment.

1.5 The risk

Post Office is committed to provide a supportive and straightforward onboarding journey, with the view to ensuring the right appointment decision for both Post Office and the prospective postmaster. Failure to do so could create risks to both the Post Office and postmaster, including:

- Financial assessment fails to flag appropriate risk weighting
- Incorrect contract agreement issued to postmasters
- Branch assistants are not vetted correctly
- Postmasters do not receive the appropriate training
- Non-compliant transactions due to sharing of Smart ID
- Non-compliance with Fit & Proper requirements for postmasters
- Data shared to unauthorised people on calls

Section 2.5 sets out the policy required operational standards Post Office has implemented to control these risks.

1.6 Legislation

Post Office seeks to comply with all relevant UK legal and regulatory requirements including (but not limited to):

- Sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 (the 2006 Act), section 24B of the Immigration Act 1971, and Schedule 6 of the Immigration Act 2016. Legislation to prevent illegal working.
- Section 122 of the Police Act 1997. Ensuring potential new postmasters or their directors/partners (if a potential new postmaster is a limited company or partnership) who have a criminal record are treated fairly and not discriminated against automatically because of a conviction or other information revealed.

⁴ In this Policy "employee" means permanent staff, temporary including agency staff, contractors, consultants and anyone else working for or on behalf of Post Office and, for clarity, does not include postmasters or their staff.

- The Data Protection Act 2018. Provision for the regulation of the processing of information relating to individuals.
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

2 Risk appetite and required operational standards

2.1 Risk appetite

Risk appetite is the extent to which the Post Office will accept that a risk might happen in pursuit of day-to-day businesses transactions. It therefore defines the boundaries of activity and levels of exposure that the Post Office are willing and able to tolerate.

The Post Office takes its legal, regulatory and contractual responsibilities seriously and consequently has:

- **Averse risk appetite** to risks around service and support provided to postmasters.
- **Averse risk appetite** to being non-compliant with our statutory and regulatory obligations.
- **Averse risk appetite** towards risks around our core operational processes that impact postmasters.
- **Averse risk appetite** for financial crime to occur within any part of Post Office or the network.
- **Averse risk appetite** in relation to unethical behaviour by Post Office employees.
- **Averse risk appetite** to risks around disputes and litigation.
- **Cautious risk appetite** towards the risk of service interruptions that would considerably reduce branch availability across the network resulting in the inability to serve customers.

Post Office acknowledges however that in certain scenarios even after extensive controls have been implemented a risk may still sit outside the agreed Risk Appetite/Risk Tolerance. Risks outside of Appetite/Tolerance may be presented to the relevant governance forums for escalation/agreement of the risk position.

If a risk is identified which is outside of agreed policy a risk exception note will be required, details of which can be found [here](#).

2.2 Policy framework

This policy is part of a framework of postmaster support policies that has been established to set the minimum operating standards relating to the management of postmaster contract risks throughout the business and network in line with Post Office's risk appetite. These are subject to an annual review. The framework includes the following policies:

- Postmaster Onboarding (this policy)
- Postmaster Training
- Postmaster Complaint Handling
- Network Monitoring and Branch Assurance Support
- Network Cash and Stock Management

- Network Transaction Corrections
- Postmaster Account Support
- Postmaster Accounting Dispute Resolution
- Postmaster Contract Performance
- Postmaster Contract Suspension
- Postmaster Contract Termination Decision Review
- Postmaster Decision Review

2.3 Who must comply?

Compliance with this policy is mandatory for all Post Office employees that manage postmaster (including Banking Hub) onboarding processes.

Where non-compliance with this policy by Post Office employees is identified by Post Office, Post Office will carry out an investigation. Where it is identified that an instance of non-compliance is caused through wilful disregard or negligence, this will be investigated in accordance with the Group Investigations Policy.

2.4 Roles & responsibilities jointly responsible for onboarding

- **Audit, Risk and Compliance Committee** – is the Committee of the Post Office Limited Board which reviews and approves Postmaster Support policies
- **Risk and Compliance Committee** - is the standing committee of the Strategic Executive Group who review and approve Postmaster Support policies for recommendation to the Audit, Risk and Compliance Committee.
- **Retail Engagement Director** – is the policy owner, who must comply with the governance responsibilities set out at section 5.1.
- **Head of Postmaster Onboarding** - is accountable for the deployment of this policy. This role is also responsible for regularly reviewing the standards and processes set out in this policy and for drafting any amendments that may be required.
- **Onboarding Manager(s)** - is accountable for the deployment of procedures and decisions required in this policy and supporting Onboarding Support Advisors who onboard postmasters.
- **Onboarding Support Advisor(s)** – carries out onboarding processes and checks and should be fully conversant with this policy and linked policies.
- **Financial Analysts** – carries out the financial analysis behind Financial Assessments which are submitted as part of the postmaster onboarding process.

- **Business Support Managers** – carries out suitability assessments along with Area Managers. They are accountable for providing basic training to branch staff and ensuring the commercial opportunities available to postmasters are understood.
- **Area Managers** – the primary contact point for branch staff. They provide tailored support for an individual branch's needs and share performance data and discuss operational issues with postmasters.
- **Smart ID Lead** – part of the onboarding team is accountable for the deployment of this policy and is responsible for supporting the team that vets Assistants and manages the annual fit & proper declaration checks.
- **Vetting Team** – part of the Onboarding Support Advisors team carry out vetting checks on Assistants and should be fully conversant with this policy and linked policies.
- **Fit & Proper Advisor(s)** – carry out annual fit & proper checks in relation to postmasters (where the postmaster is an individual), the relevant partner (where the postmaster is a partnership) or the relevant director (where the postmaster is a company and should be fully conversant with this policy and linked policies).
- **Network Provision and Property Manager** - helps to maintain the network by sourcing new possible postmasters and premises from which Post Office services can be provided.
- **Network Provision and Property Lead** – owns and develops the relationship with all potential new postmasters (and their directors/partners, if applicable) in advance of them submitting an application for a Post Office branch.
- **Scheduling Assistant** – is responsible for allocating eLearning modules to postmasters and for scheduling classroom and onsite training.
- **Onsite trainer** – is responsible for delivering a comprehensive package of training and delivering up to 6 days of onsite support to new branch teams. This training is supplemented by a minimum of one repeat visit to prepare postmasters for the weekly accounting process.
- **Head of Banking Hubs:** - is accountable for the deployment of the Banking Hub onboarding policy. This role is also responsible for regularly reviewing the standards and processes set out in this policy and for drafting any amendments that may be required.
- **Banking Hubs Operations Manager** - Is accountable for ensuring the Banking Hub sifting process is implemented fairly and within the Banking Hub onboarding timelines. They will regularly review the sifting process and measures introducing any amendments and updates once identified.

2.5 Policy required operational standards

A required operational standard defines the level of control that must be in place to manage inherent risks so that they remain within the defined Risk Appetite statements. This section of the policy also sets out the Business Area(s) responsible for managing that risk through their controls, and all employees must ensure that they comply with the policy requirements. There must be mechanisms in place within each business unit to demonstrate compliance. The policy required operational standard can cover a range of control types, i.e., directive, detective, corrective and preventive which are required to ensure risks are managed to an acceptable level and within the defined Risk Appetite.

The table below sets out the relationships between identified risk and the required policy operational standard in consideration of the stated risk appetite.

The subsequent pages define the terms used in greater detail:

Risk area	Description of risk	Required operational standard	Business owners	Control(s)	Frequency
Postmaster Onboarding	Financial assessment fails to flag appropriate risk weighting	Detective Control The Postmaster Onboarding Team will quality assure all vetting checks carried out, using Experian or Equifax, before the completed Financial Assessment can be sent to Finance for review.	Head of Postmaster Onboarding	Vetting checks of all potential new postmasters as part of the Financial Assessment	On every new potential postmaster
	Incorrect contract agreement issued to postmasters	Detective control Quality assurance must be in place to check all agreements issued by the Postmaster Onboarding Team contain the correct documentation and information.	Head of Postmaster Onboarding	Quality assurance checks to be completed by Postmaster Onboarding on all produced agreements, prior to issuing.	Every time an agreement is issued or received.

Risk area	Description of risk	Required operational standard	Business owners	Control(s)	Frequency
		Detective control Quality assurance must be in place to check all agreements returned by a Postmaster have been completed correctly, have the right signatory and there have been no amendments made to the agreement.	Head of Postmaster Onboarding	Quality assurance of all returned agreements to Postmaster Onboarding	Every time an agreement is issued or received.
	Branch assistants are not vetted correctly	Preventive control All branch assistants must successfully complete the vetting process prior to appointment. They will be advised by letter if they are unsuccessful and any appeals to the decision will be quality assured to make sure the correct outcome has been reached.	Head of Postmaster Onboarding	Correct P250 form template version has been received and fully completed Retaining copies of unsuccessful letters Validating the correct appeals process has been used	Every time
	Postmasters do not receive the appropriate training	Preventive control The Training & Scheduling Team will quality assure all allocated training for all incoming Postmasters to make sure the correct training requirements have been agreed and arranged.	Head of Postmaster Onboarding	Remote Training Requirements for Postmaster	Every time

Risk area	Description of risk	Required operational standard	Business owners	Control(s)	Frequency
				Training Requirements for Postmaster	
	Non-compliant transactions due to sharing of Smart ID	<p>Preventive control</p> <p>The Smart ID team will perform random checks to make sure the status of accounts is correct, and quality assure the activation or deactivation of a Smart ID has been completed correctly.</p> <p>Detective Control</p> <p>Upon notification of a Smart ID being shared in branch, the Smart ID team will log the occurrence to understand volumes, potential gaps in the process and future improvement opportunities.</p> <p>They will also inform key departments, for example the Postmaster Contracts Team and Area Managers, who will contact the individual to understand why the Smart ID is being shared and report the outcome back to the Smart ID team.</p> <p>Branches will be required to submit vetting forms for the branch assistant(s) without a Smart ID. If the</p>	<p>Head of Postmaster Onboarding</p> <p>Head of Postmaster Onboarding</p>	<p>Monitor and check postmaster Smart ID creation volumes</p> <p>Retired 2+ years and 90-day dormant status Accounts.</p> <p>Deactivation for 'leavers'</p> <p>Volumes of shared Smart IDs being monitored on a monthly basis</p> <p>Deactivation been completed for Branch(es) who have not provided additional P250s forms on second request</p>	<p>Monthly</p> <p>Upon notification a shared Smart ID</p>

Risk area	Description of risk	Required operational standard	Business owners	Control(s)	Frequency
		forms are not submitted after the second and final request, the Smart ID for the branch will be deactivated.			
	Non-compliance with Fit & Proper requirements for postmasters	<p>Preventive control The Fit and Proper Team will communicate with postmasters to make sure the Responsible Person(s) recorded on the branch account are accurate and up to date correct.</p> <p>Where branches fail to return the Annual Declaration within the required time limit to confirm the details of the Responsible Person(s) are correct, Bureau De Change and International Money Services will be automatically turned off.</p> <p>Preventive control The Postmaster Onboarding team complete a quality assurance check on each entity change request they receive. This is to make sure the request has come from an individual named on the current agreement.</p>	<p>Head of Postmaster Onboarding</p> <p>Head of Postmaster Onboarding</p>	<p>Addition and Removal of authorised responsible people</p> <p>Overdue Annual Declarations</p> <p>Validation of the person requesting an entity change</p>	<p>Monthly</p> <p>Every time</p>
	Data shared to unauthorised people on calls	<p>Detective control The Postmaster Onboarding team confirm the identity of the person they are speaking to, to make sure they are talking to the right person on all inbound and outbound calls.</p>	Head of Postmaster Onboarding	Verification of all inbound/outbound caller identification	On every inbound and outbound call

3 Procedures

3.1 Postmaster/Banking Hub Operators⁵ onboarding requirements

It is imperative that all onboarding activities are completed in a supported, transparent, and fully engaged manner. This will ensure that Post Office and postmasters and their teams work together to achieve a confident and trustworthy relationship. In support of this, Post Office will provide comprehensive supporting documents and telephone calls to offer substantial support throughout the onboarding journey.

The type of onboarding differs depending upon the Post Office branch type (including Banking Hubs) – please see internal processes, which are version and dated controlled and located centrally on the onboarding knowledge centre. A RACI system is in place to clarify who is responsible, accountable, informed or consulted across Post Office teams.

The list below details the high-level activities required in respect of onboarding: -

All opportunities are to be advertised on our Run a Post Office website (RaPO). This also includes Temporary Branches and Banking Hubs. The Network Provision Team own the notification of the opportunity to the Onboarding Team, with the Onboarding Team responsible for uploading and taking down the adverts. For Banking Hubs, the Network Correspondence Team own the notification of the opportunity to the Onboarding Team, with the Onboarding Team responsible for uploading and taking down the adverts.

- The prospective new postmaster (or its directors/partners) submits the application which is tracked by the Onboarding Support Advisor
- The prospective new postmaster is invited to submit a detailed Financial Assessment
- Post Office Finance team, which is part of the onboarding structure, makes a financial decision as to the ongoing sustainability of the operation based on the Financial Assessment; they notify the Onboarding Support Advisor who updates the potential new postmaster.
- If unsuccessful, the potential new postmaster can resubmit the Financial Assessment. If there is a further unsuccessful submission of the Financial Assessment, the potential new postmaster will not be able to reapply for a further 6-month period. This is not applicable for Banking Hubs due to a much simpler and shorter Financial Assessment.
- The Suitability Assessment is conducted by the Business Support Manager/Area Manager; they confirm the outcome of the assessment with the potential new postmaster
- Onboarding Support Advisor is notified of the suitability assessment outcome

⁵ In this policy “Banking Hub operator” refers to a limited company, partnership, limited liability partnership, other entity or individual that contracts with Post Office for the operation of a Banking Hub.

- If successful, agreement is created by the Onboarding Support Advisor and sent to the potential new postmaster for signature
- The agreement is signed by or on behalf of the postmaster, checked, countersigned by a Post Office Limited representative and a copy is returned to the postmaster
- An annual review assessing the financial standing of the business plan will be carried out. This aims to ensure its feasibility and highlight any area where additional support might be necessary to meet the requirements.

3.2 Onboarding journey timelines

Postmaster On-boarding Journey (Application)



Postmaster On-boarding Journey (Support)



3.3 Scheduling of operational training

Banking Hub operators will be omitted from formal training due to their appointment from within the existing postmaster population. For all other appointments, operational training will be organised as follows:

- Training dates will be mutually agreed and scheduled once the agreement between Post Office and the postmaster is signed and returned (i.e., the time at which the contract/appointment is confirmed).
- eLearning/classroom/onsite training will be discussed with prospective new postmasters or their staff (as applicable) 6 weeks prior to go live for new branches.
- In commercial transfer situations, we will aim to contact prospective new postmasters within 7 days of receipt by Post Office of the signed contract.
- At the point of being booked onto the classroom training, attendees will be registered through the LMS, to enable them to access the eLearning material
- The relevant branch staff will attend the classroom training as listed in section 3.1 of the Training Policy. (Such training is specific to the branch model).
- Once the classroom course is completed, the attendees will have a debrief session with the classroom trainers to discuss learning outcomes.
- Branch staff will receive in-branch support and training from the Onsite trainer for 6 days starting on the first day of branch operation and a follow visit for follow up balancing (FUB).

3.4 Collaborative working

Weekly or monthly calls with other functions allow Onboarding to review specific cases if required, talk about challenges that Onboarding or other teams may be experiencing and also share good experiences and practices.

Regular calls are held with the following:

- Strategic Partners
- Network Provision
- Hard to Place team
- Network Maintenance
- Training
- Business Support Managers

- National Federation of Sub-Postmasters
- Postmaster remuneration

4 Where to go for help

4.1 Additional policies

This Policy is one of a set of policies. The full set of policies can be found on the SharePoint Hub under [Postmaster Support Policies](#).

4.2 How to raise a concern

Any postmaster, any postmaster's staff or any Post Office employee who suspects that there is a breach of this Policy should report this without any undue delay.

If a postmaster or any postmaster's staff are unable to raise the matter with the area manager of the relevant branch or if a Post Office employee is unable to speak to her or his line manager, any person can bring it to Post Office's attention independently and can use the Speak Up channels for this purpose. Any person can raise concerns anonymously, although disclosing as much information as possible helps ensure Post Office can conduct a thorough investigation.

For more details about how and where to raise concerns, please refer to the current Speak Up Policy which can be found on The Hub under Post Office Key Policies, [accessed here](#), or report online at: <http://speakup.postoffice.co.uk> or call the Speak Up Line on GRO

Please note that a postmaster may also contact the National Federation of Sub-Postmasters (NFSP) for help and support, by contacting their helpline on GRO or by emailing GRO

4.3 Who to contact for more information

If you need further information about this policy or wish to report an issue in relation to this policy, please contact the Retail Engagement Director at tracy.marshall@postoffice.co.uk GRO

5 Governance

5.1 Governance responsibilities

The Policy sponsor, the Group Chief Retail Officer of Post Office, takes responsibility for policies covering their areas.

The Policy Owner is the Retail Engagement Director who is responsible for ensuring that the content is up to date and is capable of being executed. As part of the review process, they need to ensure that the minimum controls articulated in the policy are working or to identify any gaps and provide an action plan for remediation

Additionally, the Retail Engagement Director is responsible for providing appropriate and timely reporting to the Risk and Compliance Committee and the Audit, Risk and Compliance Committee as required.

The Audit, Risk and Compliance Committee is responsible for approving the Policy and overseeing compliance.

The Board is responsible for setting Post Office's risk appetite.

6 Document control

6.1 Document control version

Summary

GE policy sponsor	Standard owner	Standard implementer	Standard approver
Martin Roberts (Group Chief Retail Officer)	Tracy Marshall (Retail Engagement Director)	Jayne Pardoe (Head of Postmaster Onboarding)	R&CC/ARC
Version	Document review period	Policy – effective date	Policy location
4.1	Annual	07/2024	Postmaster Support Policies on SharePoint Hub

Revision history

Version	Date	Changes	Updated by
0.1	17th August 2020	Draft Version	Marie Pyatt
1.0	18th February 2021	Updated Draft Version	Jayne Pardoe
1.1	18th March 2021	Amendments to align with postmaster support policies	Jo Milton
1.2	30th March 2021	Addition of non-compliance minimum control standard Final approved by ARC	Jayne Pardoe
1.3	30th April 2021	Extra references to branch staff and partners and directors of Ltd companies Amendments to align with postmaster support policies	Jo Milton
1.4	25th May 2021	Added linked policy statement to front page Added reference to the Group Investigations Policy to section 2.3 Who Must Comply? Updated link to section 4.1 Added footnote to link to the vetting policy referred to in this policy.	Jo Milton
1.5	26th October 2021	Updated scheduling of operational training 3.2 Roles & responsibilities jointly responsible for onboarding 2.4	Jayne Pardoe
1.6	18 th February 2022	Annual Review 1.2 Addition of section stating that a postmaster may authorise someone to act on their/its behalf 2.1 Updated risk appetite statements to include Operational statements 3.1 Added a paragraph on Run a Post Office website	Jo Milton

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2.0	1 st April 2022	3.2 Inserted timeline graphics Amended version number following approval	Jo Milton
2.2	14 th November 2022	Annual Review Addition of references to Banking Hub operators where their onboarding differs from postmasters. 2.5 Addition of ServiceNow control checks on Notice to Leave packs, quality assurance on all agreements, validation of entity changes and caller identity on all calls	Jayne Pardoe
2.3	13 th December 2022	1.2 Removal of section acknowledging a postmaster's assistant can perform the steps in this policy 1.5 Clarification of risk relating to contract issuing 2.5 Addition of regular engagement with NFSP to discuss stalled cases 5.2 Added Speak Up contact details	Jo Milton
3.0	27 th January 2023	Updated to full version number following approval at ARC	Jo Milton
3.1	8 th December 2023	Amended risk exception statement Updated framework policy name – Contract Termination Decisions Review	Jayne Pardoe
3.2	16 th January 2024	Annual Review 2.5 Mention of a separate Finance team removed 3.1 Added that a RACI system is in place Added annual reviews of business plan 3.3 Inclusion of eLearning 3.4 Collaborative working – new section 4.2 Added NFSP contact details	Jayne Pardoe
4.0	3 rd April 2024	Updated version number following ARC approval GE replaced with SEG	Jo Milton
4.1	28 th June 2024	1.5 Risks amended to reflect ServiceNow 2.4 GE replaced with SEG 2.5 Minimum Control Standards changed to Policy Required Operational Standards and updated to reflect ServiceNow	Jo Milton

6.2 Oversight committee

Oversight committee: Risk and Compliance Committee and Audit, Risk and Compliance Committee

Committee	Date approved
POL R&CC	12 MARCH 2024
POL ARC	20 MARCH 2024

Next review: 31 MARCH 2025

6.3 Company details

Post Office Limited and Post Office Management Services Limited are registered in England and Wales. Registered numbers 2154540 and 08459718 respectively. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

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