



Compliance

Policy Monitoring Report

Postmaster Complaints Handling Policy

March 2023

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1. Scoring Table

Below table sets out the Residual Risk Score and Rating that will apply upon review of the Postmaster Complaints Handling Policy, to determine how effective the policy is, any control weaknesses or gaps and whether the policy needs enhancements/improvements.

Rating	Description
Satisfactory	The framework of governance, risk management and control is adequate and effective.
Needs Improvement	Some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management and control.
Needs Significant Improvement	There are significant weaknesses in the framework of governance, risk management and control such that it could be or could become inadequate and ineffective.
Unsatisfactory	There are fundamental weaknesses in the framework of governance, risk management and control such that it is inadequate and ineffective or is likely to fail.

2. Overall Rating / Residual Risk Score of The Review

Needs Significant Improvement	There are significant weaknesses in the framework of governance, risk management and control such that it could be or could become inadequate and ineffective.
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The overall rating for this policy is that it needs **significant improvement** to make it satisfactory. This rating has predominantly been based on the lack of direct evidence to support the various risk areas but there are specific issues that need to be addressed:

1. The risks are not articulated well and appear to be more of an impact rather than risk which means it is challenging to set out the controls properly.
2. Most of the controls are in fact processes rather than an action which makes it difficult to measure their effectiveness
3. There is no SLA set in the policy yet there is an expectation that complaint service levels will be reviewed
4. Whilst a number of metrics are tracked, it is not clear whether service level data is tracked in accordance with the policy or if recurring themes/issues/root causes are identified.

What worked well:

1. Complaint handling times appear to be OK. According to the dashboard 92% of complaints were resolved within SLA¹
2. The reporting dashboard appears to track the majority of the required metrics
3. Training in the policy is good with all staff trained in it (together with the Speak Up! training) and all have refresher training timetabled

¹ - The SLA is stated to be 10 days on the dashboard but this is not reflected in the policy

3. Other Findings of The Review

It is concerning that key individuals with roles & responsibilities set out in the policy are unaware of each other. This needs to be addressed

4. Overview

The purpose of the Policy Monitoring Report is to understand, test and gain assurance based on some point of control assurance that the Postmaster Complaints Handling Policy is working and fit for purpose.

5. Objective of the review

To assess the validity of the policy within the universe of risk framework. To review the lead and lag indicators of the policy and to test some of the key minimum control standards in the Postmaster Complaints Handling Policy. Finally, to assess whether the effectiveness of the policy is being implemented across the group.

6. Background

The Postmaster Complaints Handling Policy is sponsored by the Group Chief Retail Officer and owned by the Retail Engagement Director, however day-to-day implementation of the policy is the responsibility of the Issue Resolution Manager. The purpose of the policy is to set out the minimum control standards to be met in order to manage complaints from Postmasters consistently, fairly and within agreed timescales.

The policy sits within a suite of postmaster support policies that have been established with the intention to set the minimum operating standards relating to the management of our postmaster contract risks throughout the business. The suite of policies purport to be in-line with Post Office's risk appetite, which is primarily averse.

The Postmaster Complaints Handling Policy was initially drafted, reviewed and approved by the ARC in March 2021 with the current version being approved by the ARC in December 2022. This review forms part of the policy assurance review programme.

7. Methodology

The approach to the review was as follows:

1. Is risk adequately identified?
2. Is the risk appetite correctly identified?
3. Are the key personnel correctly identified?
4. Are reported minimum controls actually controls?
5. What are the key controls?
6. What are the key metrics?
7. Is the process/procedure correctly articulated?
8. Does the evidence show the policy is working?
9. Given the above, can we be sure the policy is fit for purpose?

8. Source of Information

The review was based on information collected from interviews with key roles supported by information provided as a result of the meetings. Access was provided to both Dynamics and the complaints' dashboard (via PowerBI). Evidence was sought from both the Issue Resolution Team Manager and Retail Engagement Director but was provided too late to test as to the effectiveness of the roles and controls set out in the policy that the evidence referred to.

9. Findings

Issue	Finding	Rating
Is risk adequately identified?	The risk areas are not described well to the extent that it is difficult to determine whether the identified risk is a risk at all.	Needs significant improvement
Is the risk appetite correctly identified?	The risk appetite is consistent with the approach taken across all Postmaster Policies with the specific risk for this area being Averse	Satisfactory
Are the key personnel correctly identified?	Key personnel are broadly identified.	Satisfactory
Are reported minimum controls actually controls?	The controls appear to be better described as policy or procedures rather than steps that would eliminate or mitigate risks. This may be as a result of the risks not being well identified.	Needs significant improvement
What are the key controls?	As controls have not been described properly, no confidence can be had that these would work. Rewording the controls may help but only where risk areas are improved. A specific control states that common and recurring issues will be escalated to the Voice of the Postmaster meeting, however these meetings have been suspended with no replacement indicated.	Unsatisfactory
What are the key metrics?	The key metrics are: • Number of Complaints received over a variety of timescales • Complaints via channel • Service Level data against target – minimum, maximum, average and outliers • Resolution types • General themes of Complaint types • Identification of recurring themes and issues • Repeat Complaints from the same Postmaster	Needs significant improvement

	A PowerBI dashboard is available that is updated daily. This is managed by the Service and Support Manager and some of the metrics are tracked. It is not clear whether service level data is tracked in accordance with the policy or if recurring themes/issues/root causes are identified	
Is the process/procedure correctly articulated?	Leaving aside the issues relating to risk identification, the general intention of the policy is clear and the handling process is understandable	Satisfactory
Does the evidence show the policy is working?	Reviews of cases in Dynamics together with the dashboard indicate that the policy is working despite the control issues	Needs Improvement
Given the above, can we be sure the policy is fit for purpose?	Although complaints appear to be handled appropriately, the lack of properly articulated controls and evidence to support certain areas, the policy needs significant improvement to give full assurance that it is fit for purpose	Needs Significant Improvement

Risk area	Description of risk	Minimum control standards	Who is responsible?	When?	Evidence seen	Review comments	Rating
Postmaster ease of raising Complaints	If Postmasters are discouraged to raise and pursue Complaints, their issues will be unknown to Post Office and remain unresolved.	Communication with Postmasters at all levels should encourage the reporting of issues and Complaints.	Postmaster facing teams	At every interaction	Adopt an Area dashboard gives some evidence of encouragement; Postmaster Support Guide published on onepostoffice site	No direct evidence that this happens has been seen. The level of complaints would indicate there is some encouragement, but improvement is needed	Needs Improvement
		Post Office will regularly review channels available to Postmasters for the raising of Complaints.	Retail Engagement Director	Quarterly	Branch Hub offers ability to make a complaint. Entries on Adopt an Area dashboard indicate other channels available for feedback. No direct evidence has been provided that indicates regular reviews are carried out	Branch Hub appears to be the central location for feedback. Postmasters can use email and anecdotal evidence suggests WhatsApp is also used.	Needs Significant Improvement

	If Post Office do not provide suitable channels for Complaint raising, Postmasters will not be encouraged to share their Complaints.	Postmaster facing teams will take reasonable steps to identify Postmaster dissatisfaction which is expressed during their contact with Postmasters and offer the Postmaster the opportunity to raise a formal Complaint.	Postmaster facing team managers	At every interaction	No direct evidence has been seen to support this measure: The Adopt and Area dashboard tracks feedback issues and there is the capability to identify key areas of concern	No supporting evidence was provided by the business area in connection with this review. Indirect evidence of compliance was provided by way of a published response to an FOIA request. In the absence of evidence managed by the relevant teams, compliance does not form part of the formal control structure and significant improvement is needed.	Needs Significant Improvement
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Risk area	Description of risk	Minimum control standards	Who is responsible?	When?	Evidence seen	Review comments	Rating
Training of this Policy and procedures for handling Complaints	If Post Office Employees are not aware of the guidelines and principles set out to deal with Postmaster Complaints, Postmasters may suffer an inconsistent service.	Training to cover the principles and minimum standards relating to Postmaster Complaints will be rolled out across all teams that could receive one.	Retail Engagement Director	Annually	Table showing completion of training in policy at 100%; Storyboards of current training in complaint handling;	Training is tracked with all team members receiving training. Annual re-training scheduled for later in year; Training materials are developed by a contractor with no permanent/FTC role appearing to have	Satisfactory

						overall responsibility. There is a risk that this may lapse once the contract period is complete if no permanent role has responsibility for BAU activity	
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Risk area	Description of risk	Minimum control standards	Who is responsible?	When?	Evidence seen	Review comments	Rating
Receipt and identification of Speak Up reports	If Speak Up incidents are not recognised and reported to the Speak Up investigation team, there is a risk that the most serious Complaints may not be investigated and resolved as a priority.	All Complaint Handlers will undertake a training and awareness programme, so that they are aware of the Whistleblowing Policy and procedure.	Learning and Development with input from the Speak Up Manager	Annually	Storyboards for Speak Up! training Records from L&D showing 100% completion of Speak Up! training	Training is tracked in accordance with POL's requirement for all staff to complete Speak Up! Training	Satisfactory
		Regular case reviews of Complaints that have/have not been identified as Speak Up reports to ensure consistency and continued understanding of the triage guidelines.	Speak Up Investigation Team and Issue Resolution Team Manager	Monthly	Met with Speak Up! Manager. Doesn't have regular meetings with Issue Resolution Team Manager and had never heard of Mat Thorley. IRT Manager completes monthly attestation of whistleblowing cases	The lack of awareness of the IRT Manager's identity is concerning and suggests a gap in connections. Evidence re the attestations was only received on the report completion date but it shows that these are carried out monthly as required. However it was not possible to test this in the time available	Needs Significant Improvement

Risk area	Description of risk	Minimum control standards	Who is responsible?	When?	Evidence seen	Review comments	Rating
Investigation and resolution of Complaints	If Postmaster Complaints are not fully understood and investigated, the root cause may not be addressed and the same Complaints could recur, leading to Postmaster and branch dissatisfaction.	Knowledge based articles and processes will be rolled out through training and reviewed regularly.	Issue Resolution Team Manager	Quarterly	Feedback from IRT Manager. Process flow for audit. Dynamics contains knowledge base articles covering multiple subjects	Current process involves 2 individuals auditing 5 KB articles and classifications/month Dip-testing articles, indicates that they are up to date which does not give rise for concern	Good
		Quality checks and training will take place with Complaint Handlers to ensure that all information is gathered, and the correct process is followed.	Issue Resolution Team Manager	Monthly as standard and weekly by exception	Feedback from IRT Manager. An attestation is completed monthly confirming quality checks undertaken Example of quality check provided.	The evidence was provided after the deadline but there is an indication that checks are done. The evidence, however, is insufficient to enable a proper assessment to be carried out.	Needs significant Improvement
	If Post Office do not take reasonable steps to achieve resolution within reasonable timescales, there is a risk that Postmasters and branches may not be able to operate effectively.	Complaint Service Levels will be regularly reviewed by the Complaint Handler and spot checked by the Issue Resolution Team Manager. Any risk to Service Level will be notified to the Postmaster in advance and flagged to the	Issue Resolution Team Manager and Complaint Handlers	Daily	Statement from IRT Manager that process exists to update PM/branch when complaint exceeds 10WD SLA. No evidence	The evidence was provided after the deadline. The evidence consisted of a workflow plus a WOW based guide but no evidence of actual reviews.	Needs significant Improvement

		Issue Resolution Team Manager.			seen of actual monitoring taking place		
		Any Complaints that are unable to be resolved will be escalated for review.	Issue Resolution Team Manager	At each occurrence	IRT Manager claims no complaint has ever been unresolved	A better understanding is needed of the concept of resolution to determine whether this measure is effective. The WOW guidance contains information on how to escalate a complaint after 10 working days and the dashboard indicates a number of cases exceeding the SLA but there is no direct evidence of that occurring. Any complaints referred to Speak Up! are managed in accordance with whistleblowing policy. Check of cases in Dynamics show cases being referred but no audit trail to confirm cases handed over. Knowledge articles indicate referrals to be carried out from personal mailboxes not central	Needs significant Improvement

						which is an unnecessary data risk.	
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Risk area	Description of risk	Minimum control standards	Who is responsible?	When?	Evidence seen	Review comments	Rating
Reporting and Insights	If Post Office are unable or unwilling to recognise consistent thematic issues Postmasters and branches will suffer recurring issues and Post Office will forfeit opportunities to address common Complaint issues.	Complaint handling reporting dashboards will be maintained and updated to show volumes, channels, Service Levels, subjects and resolution of Complaints	Service and Support Insights Manager	Weekly	Access given to PowerBI dashboard. Figures exported daily from Dynamics and inputted into dashboard. No evidence available to show that dashboard meets requirements of business	The PowerBI Dashboard is maintained over and above the minimum requirement and appears to contain metrics on the elements set out in the control. The SSI Manager is new in post and couldn't confirm whether the content of the dashboard had been agreed by the business so it's possible that the metrics are not as effective as they could be.	Needs improvement
		Interrogation of Complaints data will be undertaken to identify themes that could surface common Complaint issues.	Issue Resolution Team Manager	Weekly	Dashboard is checked daily	No evidence provided showing any thematic assessment. SSI Manager considered that to be responsibility of IRT but IRT Manager referred to SSI Manager for details. This suggests no real	Unsatisfactory

						assessment is being carried out	
	If Post Office are not transparent with performance against Service Levels applied to the Complaint handling process, Postmasters and branches and stakeholders may lose faith in Post Office's ability to effectively manage Complaints.	Common and recurring issues will be escalated to the Voice of the Postmaster meeting for awareness and discussion with the aim of establishing overarching solutions.	Voice of the Postmaster meeting	Monthly	Voice of Postmaster meetings have been suspended with no indication of when they would be restarted	Without Voice of Postmaster meetings, escalation of issues cannot happen and solutions may not be provided.	Unsatisfactory
		Postmasters will be provided with regular updates on the number of Complaints raised by Postmasters, key issues raised and what Post Office are doing if they haven't been resolved.	Service and Support Insights Manager and Issue Resolution Team Manager	Monthly	Updates provided internally but no updates provided to Postmasters by SSI Manager. No knowledge if this is done by IRT Manager	Lack of awareness of what information is provided to Postmasters is concerning. This measure does not appear to be working and therefore the risk has crystallised	Unsatisfactory
Risk area	Description of risk	Minimum control standards	Who is responsible?	When?	Evidence seen	Review comments	Rating
Policy non-adherence	Non adherence to the Policy could result in financial loss, legal and regulatory risk, detriment to Postmasters and branches and reputational damage to Post Office.	The Policy will be rolled out in training to Issue Resolution Support Advisors and wider Complaint Handler teams, with regular refresher sessions.	Issue Resolution Team Manager	Once approved and annually thereafter (or sooner in the event of material changes to the policy)	Training records	L&D training records indicate all handlers have received training and annual refreshers are scheduled.	Satisfactory

		• The Issue Resolution Team Manager is accountable for ensuring they and their team adhere to the Policy.	Issue Resolution Team Manager	Daily	Feedback from IRT Manager – checks carried out via Dynamics to determine trigger points for cases	There appears to be regular assessments of cases	Satisfactory
		• The Policy should be reviewed, and if necessary updated regularly.	Issue Resolution Team Manager	As required (but reviewed at least annually)	Document control record in policy	Current policy version is 3.0. A significant number of revisions took place for both versions 1 & 2 suggesting regular updates are carried out	Satisfactory

10. Recommendations

The following recommendations are made

1. The controls must be revisited and changed from being procedural steps to actual controls
2. Regular meetings between Speak Up! and the Issue Resolution Manager need to be put in place to ensure the relevant risk is managed properly
3. The business needs to review the dashboard and determine whether it is fit for purpose and document the decision
4. The Voice of Postmaster meetings must be reinstated and communications with Postmasters improved so that thematic issues can be addressed properly

11. Policy Owner Response

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12. Agreed actions to be taken

Action	Owner	Date to be completed by

13. Review Date/Sign Off

Policy Review Date	Next Policy Review Date	Review Conducted By	Review Signed Off By
March 2023		David Sinclair, Senior Data Protection Manager	