

Group Compliance

Compliance function - currently 3 teams, providing oversight of

- Financial Crime and Money Laundering, including Supply Chain Compliance (this team includes the MLRO);
- Anti-Bribery and Corruption
- Data Protection and Information Rights, (working alongside the DPO);
- Banking Services - supporting with interaction with regulators & banks
- Financial Services Regulation and Conduct Risk - with our 3 Principals;
- Group Policy Oversight

Objective: To provide a comprehensive 2nd line compliance function across the organisation

- There is limited / no second line compliance oversight and assurance of significant areas of the Post Office, e.g.,

Business Area	Compliance Oversight	Comment
Commercial	Partial	No oversight of Mails, Government Services, Marketing, Procurement
Retail	Partial	Partial oversight of FS, Travel Money and Banking
IT	Partial	FS oversight, with our 3 principals. Supply chain oversight
Finance	No	Assurance team working on SPMP assurance
Communications	No	Has a controls model in place and oversight through internal & External Audit
People	No	

Key areas of current focus

- **FOIs** - significant increase in volume & complexity since start of 2024. ICO engagement & action
- **DSARs** - significant increase in volume, driven by RU matters
- **Counter-fraud POL risk assessment** - meeting POL's ECCTA obligations
- **FS Conduct Risk RACI** - ensuring effective 3LOD model with our Principals
- **Roll out of controls oversight** - creating & delivering plan as 2nd line oversight limited
- **Policy oversight** - rolling programme of Group Policies oversight

Snapshot

- 172 open FOIs (127 RU cases)
 - 314 FOI requests since 01.01.24
 - 104 overdue RU FOIs and 24 overdue BAU FOIs
- 272 live DSARs
 - 454 DSARs received since 01.01.24

Financial Crime Risk Assessments

Action plan return status (rolling 12 months) for assessments delivered April 23 to April 24
On track (in progress): 2
○ Overdue: 0
○ Postponed: 0
○ Received: 18
○ Grand Total: 18

Supply Chain Compliance:

- April 2023 (1 Assurance Visits - 10 Improvement Needs)
- April 2024 (1 Assurance Visits - 0 Improvement Needs)