

Postmaster support policy

Complaint handling

Version 4.0



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 3.2 of this policy and can be found [on the hub, here.](#)

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1 Definitions

1.1 Definitions

1. **Complaint** - any oral or written statement of dissatisfaction, whether justified or not, from, or on behalf of, a Postmaster (whether a limited company, a partnership, a limited liability partnership or an individual) about the provision of, or failure to provide, a product, process or service from Post Office, or the way that Post Office interacts with the Postmaster.
2. **Complaint Handler** – any Employee of Post Office that is in a position to receive a Complaint from a Postmaster in accordance with one of the Complaint reporting channels set out at paragraph 4.1 of this Policy.
3. **Employee** – an individual who has entered into or works under (or, where the employment has ceased, worked under) a contract of employment or any other relevant contract, as defined in sections 230(2) and (3) of the Employment Rights Act 1996, with Post Office or the Group or is defined as a “worker” under section 43K Employment Rights Act 1996.
4. **Postmaster or postmaster** – this 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.
5. **Post Office and Group** – Post Office Limited and any wholly owned subsidiary that formally adopts this Policy.
6. **RCC** – this refers to Post Office Risk and Compliance Committee.
7. **Service Level (SL)** – the length of time that the Post Office expects that it will take to acknowledge and resolve a Complaint that has been formally raised.
8. **Whistleblowing (or Speak Up)**¹ – the act of a person or, in the case of a postmaster that is a limited company, partnership or limited liability partnership, entity (the “**Whistleblower**”) making a disclosure that the Whistleblower reasonably believes is (a) in the public interest, and (b) regarding past, present or likely future wrongdoing that falls into one or more of the following categories:
 - criminal offences (this may include types of financial impropriety such as fraud)
 - failure to comply with an obligation set out in law (including regulatory breaches)
 - miscarriages of justice
 - endangering of someone’s health and safety
 - damage to the environment
 - covering up wrongdoing in the above categories

¹ The terms, ‘whistleblowing’ and ‘speak up’ are often used interchangeably to promote a ‘speak up’ culture.

- a breach of the Post Office's policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of the Post Office

2 Overview

2.1 Introduction

The Central Operations Director has overall accountability to the Board of Directors for the design and implementation of controls to manage Complaints received from Postmasters as defined in this Policy.

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

2.2 Purpose

This Policy has been established to set the minimum operating standards relating to the management of Postmaster Complaints.

Post Office recognises that Complaints will occur and this Policy lays out the formal Complaints procedure which is intended to ensure that Post Office handle all Postmaster Complaints consistently, fairly and within agreed timescales.

It is one of a set of policies which provide a clear risk and governance framework and facilitate an effective system of internal controls for the management of risk across Post Office. Compliance with these policies is essential to Post Office in meeting its business objectives and to balance the needs of Postmasters, clients, and other stakeholders including our shareholder.

As many postmasters are limited companies or partnerships (and as individual postmasters may appoint managers to operate a branch on their behalf) any steps that need to be taken by a postmaster under this policy can be taken by someone authorised to act on that postmaster's behalf (such as a director, partner or manager).

2.3 Core principles

Post Office will seek to resolve all Postmaster Complaints with fairness, transparency, and professionalism (being the underpinning behaviours of Post Office).

Post Office has an obligation to its customers and clients to ensure that all branches are providing a quality of service and adhering to agreed standards. Post Office is committed to supporting its postmasters in this process by understanding, addressing, resolving and providing insight on Postmaster Complaints. This Policy sets out clear and consistent guidelines to encourage Postmasters to raise issues with Post Office, and to ensure that:

- a standard and consistent process is followed for all Postmaster Complaints.
- the prompt reporting of any Postmaster concerns is encouraged and Post Office will take Complaints raised seriously and investigate as appropriate.

- Post Office will monitor and endeavour to adhere to Service Levels, and keep the Postmaster informed, with a reason and regular updates, if there is an indication that Service Levels may be exceeded.
- Post Office will analyse Complaints data to surface common and/or recurring issues and themes and address them collectively where necessary and improve our business operations.
- Post Office will use Complaints data, and seek feedback on Postmaster satisfaction, to constantly improve our Postmaster experience.
- Post Office will produce information on the volume of Complaints and Post Office's performance against Service Levels and publish this internally on a regular basis.
- Postmaster Complaints data is combined with other postmaster insights and regularly reviewed at the Postmaster Experience Forum.

It is vital that the procedures followed in managing Complaints are as clear as possible to ensure a fair, transparent, robust and consistent process for all concerned.

2.4 Application

This Policy is for use by Complaint Handlers in relation to Complaints raised by Postmasters, as defined in this Policy, and defines the minimum standards to control financial loss, postmaster impact, regulatory breaches and reputational damage in line with Post Office's risk appetite.

2.5 The risk

Complaints should be taken seriously and managed effectively. Complaints are a good source of feedback about how Post Office can improve. If a mistake has been made, it should be resolved effectively, as soon as possible and the root cause surfaced and addressed to prevent recurrence. Complaints that are not raised, addressed and resolved can lead to Postmaster dissatisfaction, the inability of a Postmaster to operate effectively and the failure of Post Office to meet legal and regulatory requirements.

The risk in this area is that the Issue Resolution Team fail to carry out timely and fair resolutions to postmaster complaints.

Section 3.5 sets out the minimum required operational standards Post Office has implemented to control this risk.

3 Risk appetite and required operational standards

3.1 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 business transactions. It therefore defines the boundaries of activity and levels of exposure that Post Office is willing and able to tolerate.

Post Office takes its legal and regulatory 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** 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.
- **Averse risk appetite** towards risks around our core operational processes that impact postmasters.
- **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](#).

3.2 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. The framework includes the following policies:

- Postmaster Onboarding
- Postmaster Training
- Postmaster Complaint Handling (this policy)
- 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
- Postmaster Contract Termination Decision Review

The Postmaster Complaint Handling policy should be considered and read in conjunction with the Speak Up Policy² should a Complaint be identified as a potential Speak Up report.

3.3 Who must comply?

Compliance with this Policy is mandatory for Complaint Handlers, as defined in this Policy.

Where non-compliance by a Complaint Handler is identified, an investigation will be carried out. 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.

3.4 Roles and responsibilities

- **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.
- **The Postmaster Experience Forum meeting, chaired by the Postmaster Experience Director**– should:
 - Review available Postmaster insights on a regular basis.
- **Retail Engagement Director** – is the Policy owner who must comply with the governance responsibilities set out at section 6.1.
- **Issue Resolution Team Manager** – is accountable for the deployment of this Policy and the support of the team that manage Postmaster Complaints. This role also has the responsibility for regular review of the effectiveness of this Policy and for drafting any amendments that may be required.

The Issue Resolution Team Manager will lead a team of Issue Resolution Support Advisors in carrying out thorough and effective investigations to resolve any Complaints raised.

- **Issue Resolution Support Advisors and all Complaint Handlers** – should:

² The Speak Up Policy can be found [on the hub, here](#).

- be conversant with this Policy and linked policies;
 - ensure that the Complaint is acknowledged when received;
 - record and log all details of the Complaint promptly and accurately;
 - take reasonable steps to ascertain all the facts and detail of the Complaint;
 - where necessary, seek open and transparent dialogue with the Postmaster to further understand the Complaint;
 - identify Speak Up reports and pass these on to the Speak Up investigation team whilst respecting the confidentiality of the Whistleblower in accordance with and subject to any exceptions in the Speak Up Policy and Procedures;
 - act with integrity at all times;
 - ensure the Postmaster is kept up to date if Service Levels are likely to be exceeded;
 - own and monitor the progress of any investigation carried out by internal departments and third parties;
 - resolve the Complaint within agreed timescales and inform the Postmaster accordingly;
 - keep records of all material discussions with a Postmaster and other internal departments in the pursuit of information and resolution of a Complaint;
 - update case records regularly, and detail Complaint resolutions when the Complaint case is closed;
- **Central Operations Insight Manager**– should:
 - understand the requirements of the business to create useful reports for both an internal and Postmaster audience;
 - explore and interrogate the data to surface thematic and recurring detail
 - **Speak Up Manager** – should:
 - ensure that any Complaints that are passed to the Speak Up investigation team are dealt with in accordance with the Speak Up Policy;
 - communicate regularly with the Issue Resolution Team Manager to ensure that all Complaints that are Speak Up reports are identified

3.5 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	Frequency
Fair and Timely resolution of postmaster complaints	The Issue Resolution Team fail to carry out timely and fair resolutions to postmaster complaints	Preventive control: All employees receive complaint handling training detailing the Postmaster Complaint Handling policy, how to identify a postmaster complaint and the correct complaint handling processes to follow.	Central Operations Director	Training	Annually
		Preventive control: The Issue resolution team receive product training when new products are introduced, or changes are made to existing products.	Issue Resolution Team Manager	Training	Ongoing
		Preventive control: Service levels are monitored to make sure complaints are resolved in a timely manner.	Issue Resolution Team Manager	Time to resolve data	Daily
		Detective control: Quality checks are carried out to make sure the issue resolution team are following the correct	Issue Resolution Team Manager	Performance management	Monthly

Risk area	Description of risk	Required operational standard	Business owners	Control	Frequency
		<p>processes, are compliant with the policy and complaint resolutions are fair.</p> <p>Detective control: Postmasters are advised how they can escalate their complaint if they are unhappy with the resolution provided.</p>	Issue Resolution Team Manager and Complaint Handlers	<p>Identification of Speak Up cases</p> <p>Performance management</p> <p>Escalated complaint data</p>	At each occurrence

4 Procedures

4.1 How to report a complaint

Post Office is committed to finding more ways to listen to Postmasters and supports a number of Complaint reporting channels. The main channels for Complaint raising are:

Branch Hub

In order to provide a consistent way for Postmasters to voice any concerns, Branch Hub is the preferred channel to use as it can be accessed at any time, from anywhere. The Complaint will be logged on the case management tool, acknowledged within 24 hours by email and a member of the Complaint Handling team will take ownership of investigation and resolution.

Branch Support Centre

Postmasters can telephone the Branch Support Centre with a Complaint and a Branch Support Advisor will take ownership of the Complaint and escalate to the Complaint Handling team where necessary.

Area Managers

Area Managers are able to receive Complaints from Postmasters in their area and will resolve these where possible. They will be logged onto the Branch Visit form and transferred to the case management tool by the Complaint Handling team.

Unexpressed complaints

Post Office support 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.

4.2 Service levels

The Issue Resolution team will aim, where possible, to resolve the complaint within 10 working days once the case is created.

Summary of timelines

Complaint stage	Timeline
Acknowledgment sent	Within 1 working day
Aim to resolve	Within 10 working days

The Issue Resolution will ensure that regular updates are sent to the branch whilst they seek resolution.

4.3 Executive complaints

Postmasters may address their complaints and issues to senior leaders within Post Office, including the CEO and Board members. These complaints are forwarded to the Issue Resolution team for resolution.

Complaints received from a Member of Parliament are dealt with by the External Affairs team.

Complaints received from journalists are dealt with by the Press Office.

4.4 Escalating a complaint

Complaints that require escalation

If the Complaint Handler is unable to resolve a Complaint, or believes they will be unable to resolve it, the Complaint should be escalated to the Issue Resolution Team Manager for review. They will either advise the Complaint Handler or take ownership of the resolution.

Postmasters disputing the Complaint resolution

When a Postmaster contacts Post Office to dispute a resolution to an original Complaint, this will be escalated to the Issue Resolution Team Manager to review and provide a response.

4.5 Speak Up

Difference between Complaints and Speak Up

A Complaint, as defined in this Policy, is about something that affects the Postmaster (whether a limited company, a partnership, a limited liability partnership or an individual) or the branch. For example, if deliveries are not picked up on time. However, if reporting the wrongdoing is in the public interest then it could fall under the definition of Whistleblowing (or Speak Up), as defined in this Policy.

Speak Up disclosures can have certain protections that Complaints do not. Therefore, it is important to identify which type of report is being made from the outset.

The Speak Up Policy³ should be consulted before a report is made or sent to another team by the Complaint Handler.

The Issue Resolution Team Manager meets with the Speak Up Manager monthly to quality assure any complaints that could potentially be Speak Up cases.

In order to assist in identifying whether a report is a Complaint or Speak Up, please see the examples below. Further examples of events which may lead to a Speak Up disclosure are set out in the Speak Up Policy.

³ The Speak Up Policy can be found [on the hub, here](#).

Speak Up	Complaint
A Postmaster's assistant has seen a colleague processing card payments with someone else's card and with no customer present.	A Postmaster complains that their card machine does not work, and that no replacement has been sent.
When reporting an issue with a SmartID, a Postmaster's assistant reports that a POL employee asked her to use a colleague's SmartID to access Horizon.	A newly hired Postmaster's assistant forgets to ask the customer for their ID.
A Postmaster contacts an Area Manager with a discrepancy that they can't find the reason for and is immediately advised that it's best that they just pay for it. The Postmaster feels this is not in the spirit of the GLO and complains.	A Postmaster complains that they do not understand how to process a customer's Savings account application and that Post Office training has not been provided on this.
A Postmaster's assistant complains that a colleague has been making racist/discriminatory remarks to other members of staff and members of the public.	A Postmaster's assistant complains that they feel they are being bullied by the Postmaster.

Any Complaints received that are triaged and found to be Speak Up reports will be forwarded to the Speak Up Investigation Team immediately in accordance with the Speak Up Policy and Procedures, and with confidentiality protected subject to any exceptions set out in the Speak Up Policy.

For more details as to where and how to make Speak Up reports, please refer to the Speak Up Policy.

4.6 Control framework (controls reporting risks and process)

Self-assessment controls are in place around the risk descriptions, and these must be adhered to.

4.7 Reporting

Regular and accurate reporting is required to give information about Complaints to both Post Office internal functions and Postmasters.

Reporting on Complaints should include, at a minimum:

- 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

- Detailed information contained within different themes, where required
- Repeat Complaints from the same Postmaster
- Insights to inform Post Office improvements based on Postmaster feedback

4.8 Closing a case

Post Office will close a Complaint case at resolution. The resolution email sent to the postmaster will set out the options for disputing the findings.

5 Where to go for help

5.1 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](#).

5.2 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

5.3 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, Tracy Marshall, by emailing

GRO

6 Governance

6.1 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 and the Central Operations Director are 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 are responsible for approving the Policy and overseeing compliance.

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

7 Document control

7.1 Document control record

Summary

GE policy sponsor	Standard owner	Standard implementer	Standard approver
Martin Roberts (Group Chief Retail Officer)	Tracy Marshall (Retail Engagement Director)	Mat Thorley (Issue Resolution Manager)	R&CC/ARC
Version	Document review period	Policy – effective date	Policy location
4.0	Annual	05/2024	Postmaster Support Policies on SharePoint Hub

Revision history

Version	Date	Changes	Updated by
0.1	22nd January 2021	Draft Version	Jo Milton
0.2	22nd January 2021	Initial review	Jo Milton
0.3	25th January 2021	Minor revisions to draft	Jo Milton
0.4	1st February 2021	Additional risk added on training. Additional principle. Footnote to define postmasters in this policy. Minor text corrections.	Jo Milton
0.5	25th February 2021	New principles about case closure and postmaster satisfaction added to 2.3. Postmaster support policy list updated.	Jo Milton
0.6	8th March 2021	Amended risk appetite statements.	Jo Milton
0.6.1 and 0.6.2	9th and 19th March 2021	Amendments following operational review.	Jo Milton
1.0	30th March 2021	Final Version approved by ARC.	Jo Milton
1.1	26th April 2021	Minor text amendments for alignment to postmaster support policies	Jo Milton
1.2	4th May 2021	Risk appetite amendment	Jo Milton
1.3	25th May 2021	Added linked policy statement to front page Added reference to the Group Investigations Policy to section 3.3 Who Must Comply? Updated link to section 5.1 Added footnotes to link to other policies referred to in this policy.	Jo Milton
1.4	14 th February 2022	Annual Review 1.1 Amended Postmaster definition	Jo Milton

		<p>2.2 Addition of section stating that a postmaster may authorise someone to act on their/its behalf</p> <p>3.1 Updated risk appetite statements to include Operational statements</p> <p>4.8 Removed Senior Network Monitoring and Support Manager from write-off authorisation table</p> <p>3.4 Added in that the Voice of the Postmaster committee should review complaint themes regularly</p> <p>4.3 Changed the Whistleblowing examples in the table</p>	
2.0	1st April 2022	Amended version number following approval	Jo Milton
2.1	4 th July 2022	2.1, 3.4, 5.3, 6.1, 7.1 – updated owner and sponsor Rebranded policy.	Jo Milton
2.2	4 th October 2022	<p>Annual Review</p> <p>Throughout – 'Whistleblowing' references changed to 'Speak Up'</p>	Jo Milton
3.0	5 th December 2022	Updated to full version number following approval at ARC	Jo Milton
3.1	19 th June 2023	<p>Updated owner</p> <p>Updated Voice of the Postmaster meeting to Retail Committee</p>	Jo Milton
3.2	8 th December 2023	<p>Updated owner</p> <p>3.1 Amended risk exception statement</p> <p>3.2 Updated framework policy name – Contract Termination Decisions Review</p>	Jo Milton
3.3	15 th March 2024	<p>Annual Review</p> <p>Updated Whistleblowing Policy to Speak Up Policy</p> <p>2.3 Amendment of last two principles to reflect the workings of the new Postmaster Experience Forum</p> <p>2.5 Risks updated to reflect ServiceNow</p> <p>3.4 Retail Committee replaced with Postmaster Experience Forum</p> <p>3.5 Minimum Control Standards changed to Policy Required Operational Standards</p> <p>4.2/4.3 Additional sections on Service Levels and Executive complaints</p> <p>4.4 Removal of paragraph referring to persuasive factors found in the Investigations Policy (policy being rewritten)</p> <p>4.5 Addition of QA practices between IRT Manager and Speak Up Manager</p> <p>4.8 Update on case closure process</p> <p>5.2 Addition of Speak Up and NFSP contact details</p>	Jo Milton
4.0	21 st May 2024	Updated to full version number following approval at ARC	Jo Milton

7.2 Oversight committee

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

Committee	Date approved
POL R&CC	7 th May 2024
POL ARC	21 st May 2024

Next review: 31 MAY 2025

7.3 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.

Post Office Management Services Limited is authorised and regulated by the Financial Conduct Authority (FCA), FRN 630318. Its Information Commissioners Office registration number is ZA090585.

Post Office Limited is authorised and regulated by Her Majesty's Revenue and Customs (HMRC), REF 12137104. Its Information Commissioners Office registration number is Z4866081.

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