# Postmaster support policy

Accounting dispute resolution

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. Accounting Dispute the triage, management and resolution of any Discrepancy identified.
- 2. ARQ (Audit Request Query) Data This is a process whereby a number of types of data are formally requested from Fujitsu to recover from their archives.
- 3. Case Investigation Report (see Appendix 8.2) A report that is supplied to the postmaster following their investigation. The Case Investigation Report includes facts and findings of the investigation, supporting evidence and data and the rationale used to determine the outcome.
- 4. **De minimis** This is a monetary amount below which a case will be considered for write off at any stage. The de minimis value is reviewed periodically by the Dispute Resolution Committee.
- 5. **Discrepancy** Any difference between (i) the actual cash and stock position of a branch and (ii) the cash and stock position shown on Horizon as derived from transactions input by branch staff into the branch's terminals. A Discrepancy could be negative or positive.
- 6. Dispute Resolution Committee A Committee chaired by the Head of Network Support & Resolution, which is held quarterly with an extended list of attendees to make sure complex cases seek resolution or require further authority. This is also used to discuss cause analysis and appropriate action planning.
- 7. **Established Gain** An event that causes a positive Discrepancy (i.e. the situation where the branch has more cash and/or stock than the derived figures for cash and/or stock on Horizon), which has been investigated by Post Office, or agreed by the postmaster, and found to be a genuine gain to Post Office which was caused by the negligence, carelessness or error of the postmaster and/or their assistants.
- 8. **Established Loss** An event that causes a negative Discrepancy (i.e. the situation where the branch has less cash and/or stock than the derived figures for cash and/or stock on Horizon), which has been investigated by Post Office, or agreed by the postmaster, and found to be a genuine loss to Post Office which was caused by the negligence, carelessness or error of the postmaster and/or their assistants.
- 9. **Service Level (SL)** the length of time that the Post Office expects that it will take to investigate a dispute at each Tier (see table in Section 5.1).
- 10. **Tier 1** Phone based support teams that provide information and support to a postmaster with a view to resolving a postmaster query or concern. These teams will be the first point of contact.
- 11. **Tier 2** Escalation team that receives unresolved cases from Tier 1, or other internal teams and investigates them further, including the dispute of transaction corrections.

- 12. **Tier 3** The team that deals with issues escalated from or assigned directly to them by Triage or the Review Committee. These cases are either unresolved (notwithstanding investigation at Tier 1, Triage and/or Tier 2) or are too complex to be investigated at Tier 2.
- 13. **Triage** Function for assessing cases when they are passed through Tier 1 or other routes in and allocating to the relevant Dispute Resolution Team.
- 14. **Weekly Case Review** held twice weekly to make sure cases are being progressed appropriately.

## 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 accounting disputes with postmasters.

This policy is a non-contractual document provided for information. It does not form part of the contract between any postmaster<sup>1</sup> and Post Office.

#### 2.2 Purpose

This policy is part of a framework that has been established to set the minimum operating procedures relating to the management of postmaster accounting dispute resolution. The purpose of this policy is to clarify the nature of the dispute(s), set out the standards expected in dealing with any dispute resolution and the procedures that need to be followed in bringing any dispute to a conclusion.

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, customers, 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

The agreements between postmasters and Post Office set out that both parties must act at all times in good faith and Post Office will seek to resolve all accounting disputes in good faith with fairness, transparency, and professionalism (being the underpinning behaviours of Post Office).

Post Office has an obligation to postmasters to investigate any Discrepancy properly, fully and fairly, and ensure that it complies with its contractual obligations in relation to Discrepancies and investigations. These obligations include, but are not limited to:

- making decisions in accordance with the obligations of good faith, fair dealing, transparency, co-operation, and trust and confidence;
- providing adequate training and support to the postmaster;

<sup>&</sup>lt;sup>1</sup> 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.

- properly and accurately producing all relevant records and explaining all relevant transactions and/or any alleged or apparent shortfalls attributed to postmasters;
- communicating, not concealing, any known problems, bugs or errors in or generated by Horizon that might have financial (and other resulting) implications for the postmaster;
- making reasonable enquiries, undertaking reasonable analysis and even-handed investigation, and giving fair consideration to the facts and information available as to the possible causes of the appearance of alleged or apparent shortfalls (and the cause thereof);
   and
- establishing whether the alleged shortfall represents a genuine loss to Post Office.

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

# 2.4 Application

This policy is applicable to all Post Office employees<sup>2</sup> who are involved in processes related to postmaster investigations or disputes and defines the minimum standards to control financial loss, postmaster impact, regulatory breaches and reputational damage in line with the Post Office's Risk Appetite.

#### 2.5 The risk

Disputes should be resolved fully, finally and with certainty. Any investigation should be carried out in line with the core principles as set out above and completed in a timely manner with a clear conclusion reached, where possible.

If Post Office fails to do this, there is a significant risk the Network Support & Resolution team fail to carry out a timely, fair, and transparent investigation.

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

<sup>&</sup>lt;sup>2</sup> In this policy "employee" means permanent staff, temporary staff including agency staff, contractors, consultants and anyone else working for or on behalf of Post Office and, for clarity, does not include postmasters or postmasters' staff.

# 3 Risk appetite

#### 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 or network in line with Post Office's risk appetite. The framework includes the following policies:

- Postmaster Onboarding
- 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 (this policy)

- Postmaster Contract Performance
- Postmaster Contract Suspension
- Postmaster Contract Termination
- Postmaster Contract Termination Decision Review

#### 3.3 Who must comply?

Compliance with this Policy is mandatory for all Post Office employees who are involved in processes related to postmaster investigations or disputes.

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.

#### 3.4 Roles & 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.
- Assurance and Complex Investigation team provides 2<sup>nd</sup> line quality and assurance oversight.
- **Retail Engagement Director** is the policy owner, who must comply with the governance responsibilities set out at section 6.1.
- Head of Network Support & Resolution is accountable for the deployment of this policy.
  This role is also responsible for regularly reviewing the effectiveness of this policy, the
  standards and processes contained within and for drafting any amendments that may be
  required.
- Network Resolution and Support Operations Manager is responsible for overseeing the day-to-day operation of the Dispute Resolution Team(s) ensuring compliance with policy requirements, standards and processes.
- Network Resolution and Support Team Managers and Team(s) are responsible for the
  deployment of the procedures and decisions required in this policy and must be fully
  conversant with this policy and linked policies.

# 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(s)	Frequency
Conducting timely, fair, and transparent investigations	The Network Support & Resolution Team fail to carry out a timely, fair, and transparent	Detective control All investigations must check Horizon was not a contributing factor in causing the discrepancy.	Head of Network Support and Resolution	Check Horizon did not cause the discrepancy	Every time
	investigation.	Detective control The Network Support & Resolution Advisor must upload the Case Investigation Report to the Dynamics record and include all the key evidence associated with the decision outcome. Each resolved case must have a detailed check made the Team Manager, to make sure it is the right outcome.	Team Managers	Check resolved cases have the correct outcome and documentation	Every time

Risk area	Description of risk	Required operational standard	Business owners	Control(s)	Frequency
		Detective control  Where the case handler identifies any postmaster support requirements, they should escalate them to the relevant department. This could include Training, Network Monitoring (support visit) and area manager support.	Team Managers	Postmaster skillset gap - support offered	As required
		Preventive control When Tier 2 or Tier 3 complete their investigation, the Network Support & Resolution Advisor must contact the postmaster by telephone to discuss the case investigation report. If the postmaster requests a copy of the case investigation report, the Network Support & Resolution Advisor must send it to them. If the postmaster disagrees with the findings, they or their representative can escalate the case to Tier 3 or the Monthly Review Committee.	Operations Manager	Providing copies of the investigation report when requested Advising postmasters of the dispute process  Postmaster request to escalate	Every time / as required  Every time / as required
		The Head of Network Support and Resolution should chair the Monthly Review Committee. The Committee should have representatives from the operational team leads, legal, contracts, Network Monitoring, Assurance and Complex Investigations and the Branch Support Centre present.		Dispute Resolution Committee attendance	Monthly
		Detective control  A report, to identify all cases that have breached the set service level, must be run daily from MS  Dynamics. Daily and weekly cases reviews should	Team Manager	Speed of resolution	Daily

Risk area	Description of risk	Required operational standard	Business owners	Control(s)	Frequency
		take place to check case position, including age and progress.		Twice weekly case review meeting to check status of investigations	Twice weekly
		Detective control			
		Cause analysis must be carried out to identify the common causes of disputed discrepancies. Any findings should be shared with the relevant business areas, so they can put action plans in place where required.	Operations Manager and Head of Network Support and Resolution	Cause analysis of disputed discrepancies	Daily
		Preventive control			
		The Accounting Dispute and Resolution Support policy should be reviewed and updated where necessary. RCC and ARC must approve any material amendments made to the policy before the new versions are published and circulated to the business.	Head of Network Support and Resolution	Review of the Accounting Dispute and Resolution Support policy	As required (but reviewed at least annually)
		Preventive control			
		The Accounting Dispute Resolution Teams and the Postmaster Account Support Team must receive training on this policy with regular refresher training thereafter.	Head of Network Support and Resolution	Refresher training for the Accounting Dispute and Resolution Support policy	Annually or, if sooner, after the policy has had any material amendments approved,

#### 4 Procedure

## 4.1 Accounting dispute resolution

The Postmaster Account Support Policy<sup>3</sup> sets out the responsibilities of Post Office in relation to the management of account Discrepancies. These responsibilities include notifying postmasters of such discrepancies and taking payments, when agreed by the postmaster.

This section sets out the procedure for investigating Discrepancies in a fair, timely, transparent and impartial manner in order to establish whether or not they are Established Losses or Established Gains.

During the investigation process, the postmaster will not be contacted about settling the disputed amount.

A postmaster may dispute a Discrepancy or a transaction correction, in which case Post Office will support with an investigation.

All investigations teams will enter details of their investigations into the case management tool as part of a standardised dispute resolution process. In situations where Horizon data of over 12 months is required, there is a clear process for requesting ARQ Data and requesting user interaction (keystroke logging) data to ensure a consistent approach to investigations. In addition, all voice calls with postmasters are to be made using Puzzel to ensure that recording takes place.

Investigation teams will receive training on new processes and procedures and any change to existing ways of working.

**Tier 1** – These investigations are conducted by the Branch Support Centre and relate to enquiries made by postmasters about account balancing and discrepancies. The Tier 1 team may liaise with the Branch Reconciliation team that issue transaction corrections, to find out all relevant information.

Actions taken during a Tier 1 investigation could include the following:

- Talking the postmaster through basic methods to establish the reasons for their Discrepancy or transaction correction and providing associated support.
- Arranging for additional postmaster support and/or training if required (for example, classroom training on investigating balancing discrepancies).

Tier 1 investigations are intended to provide a quick resolution to postmasters on straightforward balancing and transaction correction enquiries. As such, these investigations may be resolved in a single contact and if further investigation is required, the matter will be escalated to Triage.

<sup>&</sup>lt;sup>3</sup> The Postmaster Account Support policy can be found on the hub, here.

**Triage** – These cases include disputes passed through Tier 1 without resolution. Triage is intended to ascertain the criteria to be used to assess cases and determine the allocation to investigations teams and to ensure consistency in response times.

Actions taken during the triage process could include the following:

- Cases are entered into the case management tool, if not already completed.
- Cases are reviewed by team managers and prioritised based on risk to both the postmaster and Post Office.
- Assign cases to the relevant team, noting escalations where necessary.
- A basic investigation takes place for the most common and frequent issues causing a branch discrepancy to attempt to resolve the case without further escalation, where possible.

Post Office will apply De Minimis criteria to certain cases (e.g. cases below a certain value or where no previous issues have been identified) to improve the postmaster journey and allow greater focus on priority cases. Post Office reserves the right not to apply the De Minimis if there have been more than two write offs in the last 12 months.

Tier 2 - These investigations are full detailed investigations after being assigned by Triage.

Actions taken by a Tier 2 investigation could include the following:

- Fully investigating the dispute by checking internal systems and contacting all relevant teams to determine the relevant context behind, and investigating the reason for, the Discrepancy.
- Undertaking a check of the Horizon system information to ascertain whether Horizon was a contributory factor to the Discrepancy.
- Discussing the results of the investigation in detail with the postmaster or representative team member.
- Checking if the dispute has been settled and confirming details of how and when.
- If the discrepancy is an entry on the postmaster's account, ensure that it is marked as being in dispute by the Postmaster Account Support Team.
- Checking if there are any related cases and documenting all steps of the investigation in the case management tool.
- Arranging for additional postmaster support and/or training if required (for example, classroom training on investigating balancing discrepancies).
- Flagging any issues that require root cause investigation to the relevant team.
- Carrying out data reviews and completing other details as required under the Tier 2 checklist. (See Appendix 9.1 for further details)

The Tier 2 team will aim, where possible, to complete their investigations within 10 working days of escalation from Tier 1. The postmaster will be engaged and involved throughout the process, including if they disagree with the outcome.

**Tier 3 -** Where a matter is unable to be resolved by the Tier 2 team, the Tier 2 team will escalate the investigation to the Weekly Case Review who are responsible for allocation to Tier 3. The Tier 3 team are responsible for carrying out an investigation to confirm, amongst other contractual thresholds, that:

- The alleged shortfall has been properly, fully and fairly investigated in a timely manner.
- The shortfall represents a genuine loss to Post Office properly attributable to the postmaster.
- The Horizon system information has been checked to ascertain whether the Horizon system was a contributory factor to the Discrepancy.
- Any action (or inaction) by Post Office itself has been a contributory factor that may have led whether wholly or partially to the Discrepancy.
- The shortfall has been caused through the postmaster's negligence, carelessness or error and/or the shortfall has been caused by the negligence, carelessness or error of their Assistant(s).

Post Office will offer the postmaster the Case Investigation Report (see Appendix 8.2) both for transparency and to give the postmaster an opportunity to investigate using the same information that is available to Post Office.

The Tier 3 team will aim, where possible, to complete their investigations within 10 working days of escalation.

#### Summary of investigation timelines

Investigation level	Aim to investigate within	Cumulative investigation time
Tier 1	1 working day	1 working day
Tier 2	10 working days	11 working days
Tier 3	10 working days	21 working days

#### 4.2 Postmaster circumstances

Post Office will consider any relevant circumstances of the postmaster, made known to them, including those who find themselves in a vulnerable situation, due to:

- a) Health
- b) Financial capability
- c) Financial resilience
- d) Life events.

#### 4.3 Governance

The Weekly Case Review will consist of a team of lead representatives from all Dispute Resolution Teams for the following purposes:

- Review any backlog of cases under investigation by managing, allocation, resourcing and prioritisation.
- Identify cases approaching Service Level (SL) which may pass the SL and decide actions
  to be taken to ensure the cases are dealt with efficiently but without compromising on
  the quality of the investigation and review.
- Highlight any cases of notable interest or risk. This could include cases that exceed SL, relate to discrepancies of a comparatively high value, are high profile (either with internal or external stakeholders), pose a significant risk to the reputation of Post Office, are likely to set a precedent or is an example of a frequently occurring trend. The highlighting of such cases would be at the discretion of the team manager.
- Determine which cases should be escalated to Tier 3.
- Take decisions on how to conclude investigations up to a specified threshold.
- Identify potential unusual trends or improvement points and escalate these to the relevant section of Post Office.

The Weekly Case Review will use information from ongoing open cases to be escalated to the Dispute Resolution Committee.

The Dispute Resolution Committee will consist of representatives of the investigation teams, the Head of Network Support & Resolution (Chair), operational team lead representatives, Head of Contract Management & Deployment, Director of Assurance and Complex Investigations and a legal representative for the purpose of the following:

- Review cases escalated from the Weekly Case Review and decide on actions to be taken for resolution.
- Review overall investigations performance dashboard vs SLAs

- Provide oversight of the review process and feedback on cause analysis.
- Decide on resolution from findings and outcomes on cases documented to be passed on to the relevant team to action.
- Assure decisions made are fair and reasonable for the circumstances of the case.

Minutes of the Committee meetings will be taken to record decisions.

#### 4.4 Informing a postmaster of the decision

The postmaster will be updated throughout the process, including when the investigation moves to another owner, and once the investigation is concluded. Once any level of investigation is completed, from Triage to Tier 3, Post Office will offer the postmaster a copy of a Case Investigation Report.

This document is also used by the Head of Network Support & Resolution and Tier 1-3 managers as the basis for their decision on the resolution of the case.

When informing the postmaster of the decision, Post Office will provide the following information:

- their reason(s) for reaching the decision;
- confirmation that an investigation has been carried out and that documents relating to the investigation will be offered to them; and
- any other relevant information relating to the investigation that is appropriate to be shared with the postmaster.
- If a postmaster disagrees with the outcome of a Tier 2 investigation, then the postmaster can request their case to be reviewed Tier 3.
- If a postmaster disagrees with the outcome of the Tier 3 review, then the postmaster can put
  a case forward, by email to their Tier 3 case worker, who will present to the monthly
  Committee for review.

#### 4.5 Loss Established

If Tier 1, Triage, Tier 2 or Tier 3 investigations conclude that an Established Loss has occurred, the outcome of the case will be forwarded to the Postmaster Account Support Team and the process as set out in the Postmaster Account Support Policy<sup>4</sup> will be followed.

<sup>&</sup>lt;sup>4</sup> The Postmaster Account Support policy can be found on the hub, here.

#### 4.6 Loss not Established

If Tier 1, Triage, Tier 2, or Tier 3 investigations do not conclude that an Established Loss has occurred, a decision about writing off the Discrepancy will need to be taken by the authorised roles listed below. They must give their prior approval for any such financial write off.

The table below contains a list of authorised roles and the limits of the amounts they are authorised to write off:

Up to £5,000	Tier 2 Team Manager/ Tier 3 / Postmaster Account Support Manager.
Up to £25,000	Network Support and Resolution Operations Manager.
Up to £100,000	Head of Network Support and Resolution.
Over £100,000	Central Operations Director.

Once an authorised role has approved a decision for financial write off, the manager of the Tier 1, 2 or the Tier 3 team must inform the Postmaster Account Support Team manager of the decision.

## 4.7 Review of dispute resolution files

All individual cases that are completed by Tier 2 and 3 will receive a summary quality control check by a manager for completeness and to ensure that the correct procedure has been followed and a fair and reasonable decision has been reached.

Any investigation report that is being shared with a postmaster is also to be reviewed to ensure that the report is ready in all aspects to be released to the postmaster.

The Assurance and Complex Investigations team (A&CI) will perform an independent sample check of cases on a monthly basis. The A&CI will share their findings with the Network Support and Resolution Operations Manager and the Head of Network Support and Resolution.

# 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 <u>Postmaster Support Policies</u>.

#### 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.

# 6 Governance

#### 6.1 Governance responsibilities

The Policy sponsor, the Group Chief Retail Officer of Post Office, takes responsibility at Group Executive level 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 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)	Simon Worboys (Head of Network Support and Resolution)	R&CC/ARC
Version	Document review period	Policy – effective date	Policy location
4.0	Annual	07/2024	Postmaster Support Policies on SharePoint Hub

## **Revision history**

Version	Date	Changes	Updated by
1.0	19th November 2020	Initial draft version	David Southall
2.0/0.2	10th December 2020	Amended section 4.1, changed version number to 0.2	Jo Milton
0.3	15th December 2020	Added footnotes	Jo Milton
0.4	3rd February 2021	Amended section 5 with timescales and controls.  Added section 1 – Definitions.  Added appendices.	Jo Milton
0.5	5th February 2021	Updated following legal review	Jo Milton
0.6	10th March 2021	Updated following ARC review	Jo Milton
0.6.1	16th March 2021	Text adjustments (acronyms)	Jo Milton
1.0	1st April 2021	Final approved by ARC	Jo Milton
1.1	8th April 2021	Updated draft to reflect Investigations Target Operating Model 1.0	Neil Davey
1.2	14th April 2021	Updated draft following 1st legal review	Jo Milton
1.3	26th April 2021	Alignment with other postmaster support policies	Jo Milton
1.4	4th May 2021	Risk appetite amendment	Jo Milton
1.5	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

		Removed reference to "settled centrally" in the Case Overview of the Case Investigation Report	**************************************
1.6	18 <sup>th</sup> February 2022	Annual Review  2.1 Addition of section stating that a postmaster may authorise someone to act on their/its behalf  2.5 Risks updated  3.1 Updated risk appetite statements to include Operational statements  3.4 Added in two new roles  3.5 Minimum Control Standards updated to reflect updated risks  4.1 Review Committee updated with correct names and aims  4.2 Added reference to the Decision Review process and policy.  4.4 Removed Senior Network Monitoring and Support Manager from write-off authorisation table  4.5 Updated role responsible for quality  8.1 Tier 2 Checklist (Postmaster Findings Report) updated	Simon Worboys
2.0	1 <sup>st</sup> April 2022	Amended version number following approval	Jo Milton
2.1	5 <sup>th</sup> July 2022	2.1, 3.4, 5.3, 6.1, 7.1 – updated owner and sponsor 3.5 Amended Daily Case Review to when required 4.5 Revised Tier 2 case checks from 3 to all. Font updated to Nunito Sans	Jo Milton
2.1	9 <sup>th</sup> August 2022	Throughout – amended "Operational Review Committee" to "Dispute Resolution Committee"  1.1 Removed Postmaster Information Pack and updated description of Case Investigation Report to include this. Split "Review Committee" definition into two – Weekly Case Review and Monthly Dispute Resolution Committee.  4.1 Small amends for clarity. Amended Postmaster Information Pack to Case Investigation Report (as the former is now included in the latter). Removed reference asking the postmaster to confirm receipt.  4.2 Governance header added. Separated narrative about weekly and monthly meetings. Added new action for the Weekly Case Review - "Determine which cases should be escalated to Tier 3."  4.3 Simplified bullet points to show escalation route  4.5 Removed paragraph about sample quality checks as 100% of case files receive a check.	Simon Worboys
3.0	26 <sup>th</sup> September 2022	Amended version number following approval	Jo Milton
3.1	17 <sup>th</sup> February 2023	Minor clarifications and wording amendments following legal review.  Updated owner  5.2 Added Speak Up contact details	Simon Worboys
3.2	8 <sup>th</sup> December 2023	Updated owner 1.1 Clarified Established Loss/Gain definitions 3.1 Amended risk exception statement	Jo Milton

		3.2 Updated framework policy name – Contract Termination Decisions Review	
3.3	17 <sup>th</sup> April 2024	Annual Review 1.1 Updated Monthly Dispute Resolution Committee to Quarterly 2.5 Risks updated to reflect ServiceNow 3.4 Removed Finance Director and CFO and added AC & I 3.5 Minimum Control Standards changed to Policy Required Operational Standards 4.2 Addition of postmaster vulnerability section 4.3 Updated committee members 4.4 Removed reference to Decision Review Panel 4.7 Addition of A&CI sample check 5.2 Addition of NFSP contact details	Simon Worboys
4.0	1 <sup>st</sup> July 2024	Amended version number following approval	Jo Milton

# 7.2 Oversight committee

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

Committee	Date approved
POL R&CC	13 JUN 2024
POL ARC	01 JUL 2024

Next Review: 31 JUL 2024

# 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 (HMRQ), REF 12137104. Its Information Commissioners Office registration number is Z4866081.

VAT registration number GB 172 6705 02. Registered office: Finsbury Dials, 20 Finsbury Street, London, England EC2Y 9AQ

# 8 Appendices

## 8.1 Postmaster findings report and Tier 2 checklist

Tier	2 - Investigation Details
Tier 2 Case Handler:	Date Picked Up:
Branch Name:	Branch Code:
Reference Number:	Current Discrepancy:
Branch Contact:	Contact Number:
Date Discrepancy Appeared:	Stock Unit(s) Involved:
	Date case escalated to Tier 3 (if applicable)?

#### Case Summary:

Beginning – What does the postmaster believe to have happened? What does the postmaster need to resolve the case? This should paint a picture of how the case was raised and who we have it

e.g. The dispute cases for xxx Post Office were raised by Postmaster Account Support Team following discrepancy values being settled to review and dispute.

On Xth XXXXX 202x, a shortfall/surplus discrepancy of £xxxx was settled to review and dispute.

Attempts to contact the branch were unsuccessful due to the branch landline having a call screening management set up. Email contact was attempted however no reply was received.

Postmaster stated that they believed the discrepancy was the result of xxx

(the following statement must be included in this section of the report)

The discrepancy review will be carried out in accordance with the Network Support & Resolution overarching Postmaster Dispute Resolution Policy, associated processes, strategy and any actions and decisions recorded on the log contained within this report.

#### Overview of Investigation:

Middle - What have you done to investigate the case? What actions have you taken to support the postmaster?

Evidence, timeline, findings

E.g. of structure of report

Branch Overview

Stock units

Branch users
Opening hours
CFS
Start
What happened on the day the discrepancy was settled?
What does the branch balancing look like?
When did the discrepancy start?
Middle
What potential causes are there for the discrepancy within the date range identified?
Can any of these be found to be a definite cause? If so, why? If so, why not?
End
What conclusions can be made from the findings?

# Case Outcome & Recommendation:

End – What has your investigation found? What outcome have you reached? What is your recommendation to resolve?

	Manager Comments:
Comments:	Manager perform QA of case.  Has a fair and reasonable outcome been reached? Does the case need to be
	escalated to weekly / monthly Committee? Does the case need to be escalated to Tier 3? Is there any additional action/recommendations such as escalation points?
Authorising Manager	Date:

	Action Log	
ate	Decision	Agreed Action

Document	Checked	Not Checked	Analyst Comments
Contact the Branch, introduce			
yourself as Case Handler &			
obtain/capture any relevant			
initial information from SPMR			

Document	Checked	N/A	Found	Not Found	Analyst Comments
Review Dynamics and initial case notes & familiarise with discrepancy issue whilst reviewing (If not enough detail or process has not been followed, inform Team Leader to pass back)					
Has the discrepancy been settled? If so how & when? Ensure that the discrepancy has been blocked with the Postmaster Account Support Team  GRO					
Review any possible related previous cases on Dynamics					
Check if the Branch have raised any incidents with ITDSD relating to any system issues  politsd GRO					
Check HORice to establish the last time the Branch balanced without any problems. Also check the last time they completed a BP and are they being done regularly.					
Check the latest Branch Impacting Problem tracker (BIP) to ensure the discrepancy is not related and add a copy of the BIP tracker to the dynamics case.					
Checked where the discrepancy is (Cash, currency, or stock)					
Checked stock & cash rems					
Checked stock adjustments					
Checked reversals new & existing					

Document	Checked	N/A	Found	Not Found	Analyst Comments
Checked transfers					
Checked mis keys					
Checked non sales (housekeeping/ Rep Events)					
Check duplicate transactions					
Check trading statements					
Check suspense account					
Check if there are any zero transactions that should have a value					
Check any cash variance					
Check recoveries – roll forward or roll back					
Check for any Transaction Correction's					
Check for any Transaction Acknowledgement's					

Dispute Policy Checklist			
Document	Checked	N/A	
The alleged shortfall has been properly, fully and fairly investigated in a timely manner			
The shortfall represents a genuine loss to Post Office properly attributable to the postmaster			
A review of the Horizon system has been undertaken to ensure that it was not a contributory factor to the discrepancy			
Any action (or inaction) by Post Office Limited has not been a contributory factor that led directly to the shortfall			
The shortfall has been caused through the postmaster's negligence, carelessness, or error and/or the shortfall has been caused by the negligence, carelessness, or error of their Assistant(s)			

	Case data
Use this box to embed your case data	

# 8.2 Case investigation report

Tier 3 Review Document

	Investigation Details
Branch Name & Branch Code:	
Case Reference Number:	
Postmaster Name:	
Legal Entity Contracted with:	
Branch Format:	
Former/Current:	
Claim Value:	

Executive Summary
Note: This section is to provide an overview of the case, key points and the conclusion. This section should be in bullet point format (where possible).

Analyst Recommendation						
Recommendation:	Note: Recommendation to be completed by Analyst.					
Value (If Applicable):						
Case Handler:	Date:					

Manager Comments					
Comments:	Note: Comments to be completed by Manager.				
Authorising Manager:	Date:				

#### Case Summary

The discrepancy review will be carried out in accordance with the Network Support & Resolution overarching Postmaster Dispute Resolution Policy, associated processes, strategy and any actions and decisions recorded on the log contained within this report.

#### Case Overview

#### **Branch Overview**

Stock units Branch users Opening hours

CFS

#### **Rough Notes**

#### Case Conclusion

Note: This section is to finalise the findings of the Investigation Overview section into a conclusion on the case.

#### Additional Case Findings

Note: This can be findings which do not specifically relate to the case, but are appropriate to send on to a different team in the business; for example the branch are processing reversals for small value transactions to cash, which could highlight the branch taking retail transactions at the Post Office counter. This would be something to feedback to the Area Manager.

#### Additional Support Required

Note: This section can contain any support which is recommended as being required. For example; It is recommended that the branch is provided additional training and support around cash declarations and lottery accounting. This additional training would then need to be requested by the analyst.

#### **Business Improvements**

Note: This section is to note any potential business improvements which have been raised through the investigation.

	Action Log	
Date	Decision	Action

Case Evidence Log							
Document/Information Used	Document Reference	Comments					

#### CIR- Investigation checklist

	General Cas	se Checklist items:			
Data Downloads for Discrepancies:					
Session Data					
Rep Events					
Trading Period Data					
Core Finance System Data					
Transaction Corrections (if applicable)	) 🗆				
Ensure these are completed at earlies	t opportunity	, to avoid risk of lo	sing data.		

Document	Checked	N/A	Found	Not Found	Analyst Comments
Review Dynamics and initial case notes & familiarise with discrepancy issue whilst reviewing (If not enough detail or process has not been followed, inform Team Leader to pass back)					
Contact the Branch, introduce yourself as Case Handler & obtain/capture any relevant initial information from SPMR					
Has the discrepancy been settled? If so how & when? Ensure that the discrepancy has been blocked with the Postmaster Account Support Team  GRO					
Review any possible related previous cases on Dynamics					
Check if the Branch have raised any incidents with ITDSD relating to any system issues  politsd GRO					
Check HORice to establish the last time the Branch balanced without any problems. Also check the last time they completed a BP and are they being done regularly.					

Document	Checked	N/A	Found	Not Found	Analyst Comments
Check the latest Branch Impacting Problem tracker (BIP) to ensure the					
discrepancy is not related and add a					
copy of the BIP tracker to the					
dynamics case.					
Checked where the discrepancy is					
(Cash, currency or stock)					
Checked stock & cash rems					
Checked stock adjustments					
Checked reversals new & existing					
Checked transfers					
Checked mis keys					
Checked non sales (housekeeping/ Rep Events)					
Check duplicate transactions					
Check trading statements					
Check suspense account					
Check if there are any zero transactions that should have a value					
Check any cash variance					
Check recoveries – roll forward or roll back					
Check for any Transaction Correction's					
Check for any Transaction Acknowledgement's					

Dispute Policy Checklist	
Document	Checked
The alleged shortfall has been properly, fully, and fairly investigated in a timely manner	

A review of the Horizon system has been undertaken to ensure that it was not a	
contributory factor to the discrepancy	
Any action (or inaction) by Post Office Limited has not been a contributory factor that led directly to the shortfall	
The shortfall has been caused through the postmaster's negligence, carelessness, or error and/or the shortfall has been caused by the negligence, carelessness, or error of their Assistant(s)	

