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Postmaster Complaint Handling Policy  
V0.6.2



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## 1. Definitions

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### 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** – this refers to a limited company, partnership, limited liability partnership or individual that contracts with the Post Office in its or their capacity as a postmaster in the network, or assistants of such postmasters.
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** – 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

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Item 2.1.1.1 Postmaster Polices - Appendices

- 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

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## 2. Overview

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### 2.1. Introduction by the Policy Owner

The Service and Support Optimisation 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 Postmasters 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 our Postmasters, clients, and other stakeholders including our shareholder.

### 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 stakeholders, clients and Postmasters, to understand, address, resolve and provide 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 SLs, and keep the Postmaster informed, with a reason and regular updates, if there is an indication that SLs 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 SLs and publish this both internally and to Postmasters on a regular basis.
- Postmaster Complaints data is regularly reviewed at the Risk and Compliance Committee.

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 outlines the manner in which Post Office will encourage, receive and manage Postmaster Complaints.

## 2.5. The Risk

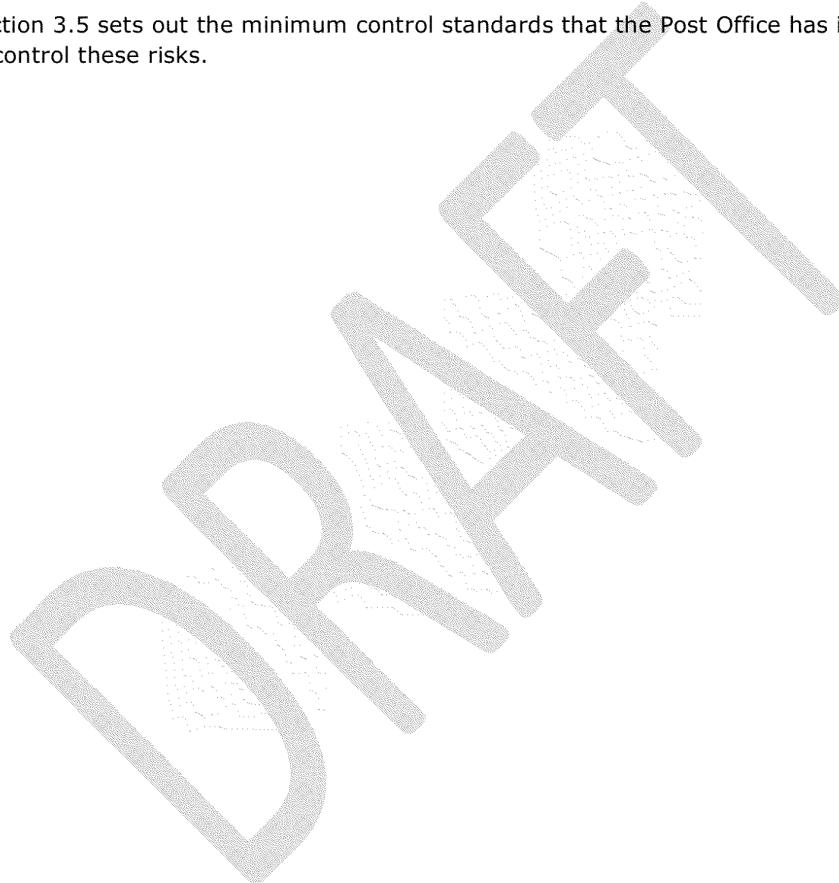
Complaints should be taken seriously and managed effectively. Complaints are a good source of feedback about how Post Office can improve. If a mistake has been made, it should be resolved effectively, as soon as possible and the root cause surfaced and addressed to prevent recurrence. Complaints that 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 risks in this area include:

- If Postmasters are discouraged to raise and pursue Complaints, their issues will be unknown to Post Office and remain unresolved.
- If Post Office do not provide suitable channels for Complaint raising, Postmasters will not be encouraged to share their 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.
- If Whistleblowing reports are not recognised and reported to the Whistleblowing team, the Postmaster may not be offered protections in accordance with the Whistleblowing Policy.
- If Postmaster Complaints are not understood and investigated as appropriate, the root cause may not be addressed and the same Complaints could recur, leading to Postmaster dissatisfaction.
- If Post Office do not take reasonable steps to achieve resolution within reasonable timescales, there is a risk that Postmasters may not be able to operate effectively.

- If Post Office are unable or unwilling to recognise consistent thematic issues Postmasters will suffer recurring issues and Post Office will forfeit opportunities to address common Complaint issues.
- If Post Office are not transparent with performance against SLs applied to the Complaint handling process, Postmasters and stakeholders may lose faith in Post Office's ability to effectively manage Complaints.
- Non adherence to this Policy could result in financial loss, legal and regulatory risk, detriment to Postmasters and reputational damage to Post Office.

Section 3.5 sets out the minimum control standards that the Post Office has implemented to control these risks.

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## 3. Risk Appetite and Minimum Control Standards

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### 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 corporate non-compliance with legal and statutory obligations.
- **Averse risk appetite** for taking risks which might result in failure to maintain the service commitment in respect of customers in line with our social purpose and Government's policy on subsidy.
- **Averse risk appetite** for financial crime to occur within any part of the organisation.
- **Averse risk appetite** associated to the health, safety and wellbeing of POL customers and colleagues in everything we do.
- **Averse risk appetite** in relation to unethical behaviour by Post Office staff.
- **Cautious risk appetite** to litigation.
- **Cautious risk appetite** for inefficient or ineffective processes that result in: lost time, duplicated effort, and increased risk of financial loss or errors in any part of its business or core processes
- **Neutral risk appetite** for dissatisfaction related to BAU services recognising that in a complex business there will be a level of dissatisfaction as part of the normal course of business of achieving our commercial objectives.
- **Flexible risk appetite** to lose the engagement of any key stakeholder in the process and for staying the course in face of opposition if in the wider interests of the business and its commercial priorities.

The Post Office acknowledges, however, that in certain scenarios, even after extensive controls have been implemented, a process may still sit outside the agreed Risk Appetite. In this situation, a risk exception waiver will be required pursuant to the Exemption Process.

### 3.2. Policy Framework

This Policy is part of a framework of Postmaster policies that has been established to set the minimum operating standards relating to the management of our postmaster contract

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risks throughout the business in line with Post Office's risk appetite. The framework includes the following policies:

- Postmaster Onboarding
- Postmaster Training
- Postmaster Contractual Performance
- Postmaster Suspension
- Postmaster Termination
- Postmaster Termination Decision Review
- Network Monitoring and Audit Support
- Network Cash and Stock Management
- Network Transaction Correction
- Postmaster Account Support
- Postmaster Accounting Dispute Resolution
- Postmaster Complaint Handling (this Policy)

The Postmaster Complaint Handling policy should be considered and read in conjunction with the Whistleblowing Policy should a Complaint be identified as a potential Whistleblowing 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 may be treated as a disciplinary offence.

### 3.4. Roles and Responsibilities

- **Risk and Compliance Committee** – should:
  - Review all Postmaster Complaint themes on a regular basis as part of the RCC agenda.
- **Service and Support Optimisation Director** – is the Policy owner.
- **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.

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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:

- be fully 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 Whistleblowing reports and pass these on to the Whistleblowing team whilst respecting the confidentiality of the Whistleblower in accordance with and subject to any exceptions in the Whistleblowing Policy and Procedures;
- act with integrity at all times;
- ensure the Postmaster is kept up to date if SLs 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;

• **Service & Support Insights 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

• **Whistleblowing Manager** – should:

- ensure that any Complaints that are passed to the Whistleblowing team are dealt with in accordance with the Whistleblowing Policy;
- communicate regularly with the Issue Resolution Team Manager to ensure that all Complaints that are Whistleblowing reports are identified

### 3.5. Minimum Control Standards

A minimum control standard is an activity which must be in place in order to manage the risks, so they remain within the defined Risk Appetite statements. There must be mechanisms in place within each business unit to demonstrate compliance. The minimum control standards 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 minimum control standards in consideration of the stated risk appetite. The subsequent pages define the terms used in greater detail:

Risk Area	Description of Risk	Minimum Control Standards	Who is responsible	When
Postmaster ease of raising Complaints	<p>If Postmasters are discouraged to raise and pursue Complaints, their issues will be unknown to Post Office and remain unresolved.</p> <p>If Post Office do not provide suitable channels for Complaint raising, Postmasters will not be encouraged to share their Complaints.</p>	<ul style="list-style-type: none"> <li>Communication with Postmasters at all levels should encourage the reporting of issues and Complaints.</li> <li>Post Office will regularly review channels available to Postmasters for the raising of Complaints.</li> <li>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.</li> </ul>	Postmaster facing teams  Head of Service and Support Optimisation  Postmaster facing team managers	At every interaction  Quarterly  At every interaction
Training of this Policy and	If Post Office Employees are not aware of the	<ul style="list-style-type: none"> <li>Training to cover the principles and minimum standards relating to</li> </ul>	Head of Service and Support Optimisation	Annually

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procedures for handling Complaints	guidelines and principles set out to deal with Postmaster Complaints, Postmasters may suffer an inconsistent service.	Postmaster Complaints will be rolled out across all teams that could receive one.		
Receipt and identification of Whistleblowing reports	If Whistleblowing incidents are not recognised and reported to the Whistleblowing team, there is a risk that the most serious Complaints may not be investigated and resolved as a priority.	<ul style="list-style-type: none"> <li>All Complaint Handlers will undertake a training and awareness programme, so that they are aware of the Whistleblowing Policy and procedure.</li> <li>Regular case reviews of Complaints that have/have not been identified as Whistleblowing reports to ensure consistency and continued understanding of the triage guidelines.</li> </ul>	Learning and Development with input from the Head of Financial Crime  Whistleblowing Officer and Issue Resolution Team Manager	Annually  Monthly
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.  If Post Office do not take reasonable steps to achieve resolution within	<ul style="list-style-type: none"> <li>Knowledge based articles and processes will be rolled out through training and reviewed regularly.</li> <li>Quality checks and training will take place with Complaint Handlers to ensure that all information is gathered, and the correct process is followed.</li> <li>Complaint SLAs will be regularly reviewed by the Complaint Handler and spot checked by the Issue Resolution Team Manager. Any risk to SL will be notified to</li> </ul>	Issue Resolution Team Manager  Issue Resolution Team Manager  Issue Resolution Team Manager and Complaint Handlers	Quarterly  Monthly as standard and weekly by exception  Daily

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	<p>reasonable timescales, there is a risk that Postmasters and branches may not be able to operate effectively.</p>	<p>the Postmaster in advance and flagged to the Issue Resolution Team Manager.</p> <ul style="list-style-type: none"> <li>Any Complaints that are unable to be resolved will be escalated for review.</li> </ul>	<p>Issue Resolution Team Manager</p>	<p>At each occurrence</p>
Reporting and Insights	<p>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.</p> <p>If Post Office are not transparent with performance against SLs applied to the Complaint handling process, Postmasters and branches and stakeholders may lose faith in Post Office's ability to effectively manage Complaints.</p>	<ul style="list-style-type: none"> <li>Complaint handling reporting dashboards will be maintained and updated to show volumes, channels, SLs, subjects and resolution of Complaints</li> <li>Interrogation of Complaints data will be undertaken to identify themes that could surface common Complaint issues.</li> <li>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.</li> <li>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.</li> </ul>	<p>Service and Support Insights Manager</p> <p>Issue Resolution Team Manager</p> <p>Voice of the Postmaster meeting</p> <p>Service and Support Insights Manager and Issue Resolution Team Manager</p>	<p>Weekly</p> <p>Weekly</p> <p>Monthly</p> <p>Monthly</p>

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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.	<ul style="list-style-type: none"><li>The Policy will be rolled out in training to Issue Resolution Support Advisors and wider Complaint Handler teams, with regular refresher sessions.</li><li>The Issue Resolution Team Manager is accountable for ensuring they and their team adhere to the Policy.</li><li>The Policy should be reviewed, and if necessary updated regularly.</li></ul>	Issue Resolution Team Manager	Once approved and annually thereafter
			Issue Resolution Team Manager	Daily
			Issue Resolution Team Manager	Annually

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## 4. Procedures

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### 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.

#### 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.

#### 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.

#### 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. 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.

A Complaint can be directed to the relevant Group Policy Owner for an investigation under the Investigations Policy if it meets a certain risk threshold. The Investigations Policy lists a number of "Persuasive Factors" in favour of an investigation, one of which is Postmaster Complaints relating to a material, frequently arising or systemic issue. The

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risk assessment that should be conducted in relation to such Complaints is discussed further in the Investigations Policy.

Please refer to the Investigations Policy for further information regarding the referral of a Complaint for an investigation and also for contact details of the Group Policy Owners.

#### 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.

### 4.3. Whistleblowing

#### Difference between Complaints and Whistleblowing

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, as defined in this Policy.

Whistleblowing 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 Whistleblowing Policy should be consulted before a report is made or sent to another team by the Complaint Handler.

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

<b>Whistleblowing</b>	<b>Complaint</b>
A Postmaster's assistant has seen card payments processed 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.
A Postmaster's assistant notices that customers ID is not being checked where required and the customer is handing over cash as a personal payment for processing the transactions.	A newly hired Postmaster's assistant forgets to ask the customer for their ID.
A Postmaster's assistant believes that the Postmaster is using personal customer information to set up fraudulent accounts.	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.

<b>Whistleblowing</b>	<b>Complaint</b>
A Postmaster's assistant complains that racist/discriminatory remarks are made 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 Whistleblowing reports will be forwarded to the Whistleblowing Team immediately in accordance with the Whistleblowing Policy and Procedures, and with confidentiality protected subject to any exceptions set out in the Whistleblowing Policy.

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

#### 4.4. Control Framework (controls reporting risks and process)

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

#### 4.5. 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
- SL 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

#### 4.6. Closing a case

Post Office will close a Complaint case if the Postmaster is in agreement. However, in the absence of an agreement, or otherwise, the case can be closed at the discretion of the Post Office.

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## 5. Where to go for help

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### 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 [Policies](#).

### 5.2. How to raise a concern

Any Postmaster (whether a limited company, partnership, limited liability partnership or an individual) or any Post Office Employee who suspects that there is a breach of this Policy should report this without any undue delay.

If the Postmaster is 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, you can bring it to Post Office's attention independently of management and you can use the Whistleblowing channels for this purpose. You can raise your 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 your concerns, please refer to the current Whistleblowing Policy which can be found on The Hub under Post Office Key Policies, [accessed here](#).

### 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 Service and Support Optimisation Director, Tim Perkins, by emailing [GRO](mailto:GRO)

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## 6. Governance

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### 6.1. Governance Responsibilities

The Policy sponsor, responsible for overseeing this Policy is the Retail and Franchise Network Director of Post Office Limited.

The Policy owner is the Service and Support Optimisation Director who is responsible for ensuring that the Issue Resolution Team Manager conducts an annual review of this Policy and tests compliance across the Post Office. Additionally, the Service and Support Optimisation Director and the Issue Resolution Team Manager and their team are responsible for providing appropriate and timely reporting to the Risk and Compliance Committee.

The Audit and Risk Committee are responsible for approving the Policy and overseeing compliance.

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

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## 7. Control

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### 7.1. Policy Version

Date	Version	Updated by	Change Details
22 <sup>nd</sup> January 2021	0.1	Jo Milton	Draft Version
22 <sup>nd</sup> January 2021	0.2	Tim Perkins	Initial review
25 <sup>th</sup> January 2021	0.3	Jo Milton	Minor revisions to draft
1 <sup>st</sup> February 2021	0.4	Jo Milton	Additional risk added on training. Additional principle. Footnote to define postmasters in this policy. Minor text corrections.
25 <sup>th</sup> February 2021	0.5	Jo Milton	New principles about case closure and postmaster satisfaction added to 2.3. Postmaster Policy list updated.
8 <sup>th</sup> March 2021	0.6	Jo Milton	Amended risk appetite statements.
9 <sup>th</sup> and 19 <sup>th</sup> March 2021	0.6.1 and 0.6.2	Jo Milton	Amendments following operational review.

### 7.2. Policy Approval

**Oversight Committee:** Risk and Compliance Committee and Audit and Risk Committee

Committee	Date Approved
POL R&CC	16 <sup>th</sup> March 2021
POL ARC	

**Policy Sponsor:** Retail and Franchise Network Director  
**Policy Owner:** Service and Support Optimisation Director  
**Policy Author:** Senior Operational Improvement Manager  
**Next review:** 31 MAR 2022

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#### 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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