



[REDACTED]
[REDACTED]

Date
24 October 2025

Post Office
100 Wood Street
London EC2V 9ER

Your Ref:

Classification:
Public

Dear [REDACTED],

Freedom of Information Request – FOI2025/00574

We are writing in response to your email received by Post Office Limited (**"Post Office"**) on 13 August 2025, which has been dealt with under the terms of the Freedom of Information Act 2000 (**"FOIA"**).

In your email, you have requested the information shown verbatim in bold below:

Please could you detail the number of Bill Payments transactions made at your network branches (with Payzone) for the following periods:

- * **1st April 23 - 31st March 24**
- * **1st April 24 - 31st March 25**

We can confirm that Post Office holds the information you have requested. However, the information you requested is being withheld as it falls under the exemption in section 43(2) of the FOIA, which relates to information which could, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

We recognise that there may be a public interest in disclosure of information concerning details of the number of Bill Payment transactions.

Factors in favour of disclosure:

- Promotes transparency in Post Office operations.

- Provides reassurance regarding the use of public funds.

However, there is a strong public interest in withholding the information as it would, if disclosed, prejudice the commercial interests of Post Office and third parties. This is because disclosing information about the numbers of bill payment transactions in Post Office branches and/or Payzone retailers would prejudice Post Office's commercial interests noted below:

Factors in favour of withholding:

- **Market Positioning:** Revealing transaction volumes could give competitors insight into the Post Office's market share and performance, as all bill payments contracts we hold have been won through competitive tenders. If transactional numbers were disclosed; they would give our competitors a better opportunity to undercut our bids at a such lower rate or provide them with an advantageous understanding of their current foot hold in the market to better position themselves. Our competitors are not obliged to share this type of information so we would not have the same valuable data to be on a level playing field with other bill payment providers who are Private companies and not subject to FOIA. This could mean we could lose clients to our direct competition, causing lower footfall and revenue to us and our postmasters. This is particularly sensitive given our role as both a reseller and a direct contract holder in the bill payments market.
- **Pricing Strategies:** Revealing transaction trends could expose customer behaviour patterns and allow competitors to infer pricing strategies, potentially leading to undercutting or imitation. Transactions with the revenue amount (available from our Publication Scheme) will allow competitors to work out an average charge per transaction and undercut this. Our transaction numbers of bill payments have never previously been disclosed, so coupled with publicly available Bill Payments revenue would affect Post Office and our Postmasters commercial interests.
- **Revenue Implications:** In addition to the market position, we have data sharing clauses with our partners, so need to be mindful of transaction numbers being disclosed. We hold a number of contracts with partners who are also contracted to our resellers. If transaction numbers were shared, it would come under question by our resellers who are in competition with each other in the

reseller space. Disclosure could expose financial vulnerabilities or strengths in specific markets, affecting our ability to compete in future tenders.

- **Contractual Obligations:** In addition to the points above we have agreements in place with strategic partners which include confidentiality and data sharing clauses. Disclosure of transaction numbers could breach these terms and would be likely to damage our current and/or future relationships and could cause prejudice to Post Office commercial interests as we would not be able to abide by these causes. Although we are being asked to provide all transactions for two financial years, rather than a breakdown of each contract, which would normally provide obscurity, we have had to consider the requester's identity and motives for purposes for which the information is likely to be used if released into the public domain, contrary to how we normally handle FOIA requests.

Post Office are unable to gain this vision on Resellers or other Bill Payment competitors transactions as they are private companies and not subject to FOIA. Disclosure of our transactions numbers are likely to cause prejudice to our partners market position breaching our and their commercial interests.

On balance, we consider that the public interest in maintaining the exemption outweighs the public interest in disclosure if Post Office would be unable to operate in a fair marketplace regarding the competitive dialogue procedure and are commercially damaged by the release of the information.

If you are dissatisfied with the handling of this response, you do have a right to request an internal review. You can do this by writing to the address above within 40 working days of receipt of this response stating your reasons for your internal review request or alternatively, by emailing information.rights@postoffice.co.uk.

If, having requested an internal review by Post Office, you are still not satisfied with our response you also have a right of appeal to the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Telephone: 0303 123 1113

www.ico.org.uk/foicomplaints

Yours sincerely,

Information Rights Team

information.rights@postoffice.co.uk

<https://corporate.postoffice.co.uk/en/governance/access-to-information/access-to-information/>

Post Office Limited is committed to protecting your privacy, information about how we do this can be found on our website at www.postoffice.co.uk/privacy