

Risk & Compliance Committee Report

June 2009

Distribution	
Committee Members	Other attendees at the meeting (lead on reporting)
Luke March (Chair)	John Scott (Head of Security)
Alan Cook	Peter Tansley (Internal Audit & Risk Management)
Gary Hockey-Morley	Keith Woollard (Head of Compliance)
Paula Vennells	Lynn Hobbs (General Manager Network)
	Andrew Spice (Head of Financial Services)
	Kiron Farooki (RMG Legal)

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1. Losses Report Period 2



Pillar Losses	£m
Full Year Actuals 08/09	5.6
YTD Actual	0.5
YTD Budget	0.8
Full Year Budget	5.4
Full Year Forecast	5.4

Channel Losses	£m
Full Year Actuals 08/09	4.0
YTD Actual	0.6
YTD Budget	0.7
Full Year Budget	4.3
Full Year Forecast	4.3

Other Losses*	£m
Full Year Actuals 08/09	18.5
YTD Actual	2.3
YTD Budget	0.4
Full Year Budget	3.2
Full Year Forecast	9.8

Total Losses	£m
Full Year Actuals 08/09	28.1
YTD Actual	3.4
YTD Budget	1.9
Full Year Budget	13.0
Full Year Forecast	19.6

* Previously net losses

Pillar Losses (Financial Services, Mails, Telephony, Government Services)

Year to date favourable variance of £292k due to timing and budget calendarisation of Mails and Financial services products. Telephony losses of £495k for bad debts/write offs.

Channel Losses (Crown, WH Smith, Account Managed, Centrally Supported)

Channel losses favourable variance of due to a £136k due to controls in place to reduce losses.

Other Losses (Robberies and Burglaries, Former Subpostmaster Accounts, Foreign Exchange, Provisions and any Other Losses not Connected to Pillar or Channel)

Year to date adverse variance of £1.9m, from actual losses of £2.3m due to losses of £516k from robberies and burglaries, provisions of £1391k and Foreign Exchange (Bureau hedge) of £443k. See breakdown below for the year to date provisions and the full year impact taken to forecast (resulting in £6m increase in full year forecast).

RMG Stock - £379k - Amount settled with RMG (approx 200k per month). Full year effect of £2.4m taken to forecast Post Office savings stamps - £527k as advised by E&Y until old style savings stamps is withdrawn, full year forecast £2.0m

Former Sub Postmaster debt - £300k, Full year effect at run rate taken to forecast £1.6m

Maintained Errors - £100k

Other provisions - £85k

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2. Security Team Risk Summary (See Appendix A for detail)





Commentary

- Casework losses year to date amounts to £470k in 31 matters raised year to date.
- Network robbery and burglary losses year to date amounts to £366.9k in 78 incidents
- Supply Chain robbery losses year to date amounts to £157.5K in 18 incidents

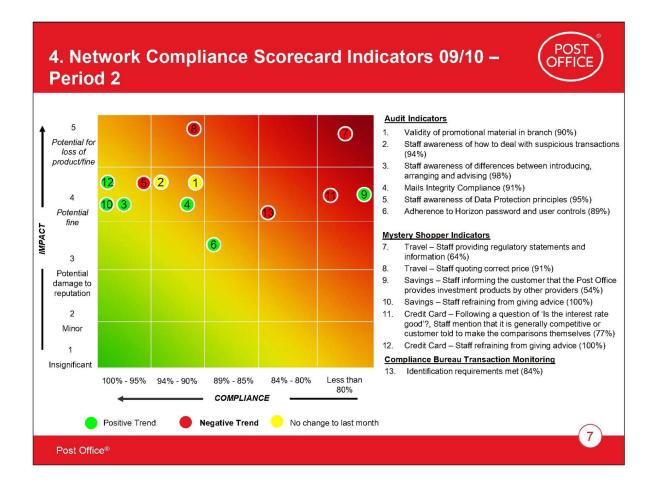
Crime Risk Indicators These are summarised as below. A red downward arrow indicates a worsening trend and a green upward arrow an improving

Post Office Network Robbery & Burglary Losses	1	Cheques/Open Items	1
Supply Chain Robbery Losses	Û	Chargebacks	1
Asset Recovery	1	Rejected Postage Labels	
Crown Offices Losses	1	Savings Stamps	Û
Lottery	1	anat	1

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3. Current Regulatory Risks & Issues Irrelevant





4 continued. Network Compliance Scorecard Indicators 09/10



Commentary

The latest results show a drop in overall performance from last month (87% to 85%). This is mainly due to reduced levels of compliant Bureau transactions over £5k, from 90% in April to 84% in May (which is more in line with the level of compliance recorded in 2008/9). However, the Compliance Mystery Shopping savings scenario showed some encouraging signs of improvement, with an increase in score from 69% in April to 77% in May.

•	The top three areas of non conformance in the Network, as measured in the scorecard and illustrated on the previous slide

are:-	I=
Regulated Area	Remedial Action
Staff mentioned that Post Office provides products from other	Managa rainforced in equings WTLL in March 2000 and
, ,	other communications with branches and reviewed as part of
products – 54%	the remedial action plan, in response to NS&I audit.
(INDICATOR NO. 9)	
Staff selling travel insurance to a mystery shopper provided	600 Crown Office BMs and Product Champions attended
the regulatory warning statements – 64%	training provided by Aon in May and further initiatives are
	being considered. TI product mangers will review in July
(INDICATOR NO. 7)	whether there are changes to the customer journey that
	would improve conformance.
When asked by a mystery shopper if the interest rate for the	A WTLL session on Credit Card was delivered in January
Post Office Credit Card was good, the response actively	2009. Given the wider implication of the result of this
provided a view that the rate is generally competitive or	scenario, a further WTLL session is being planned in June
included a suggestion that the customer makes comparisons	(with a view to covering the broader regulatory issue, beyond
for themselves – 77% (INDICATOR NO. 11)	that identified for credit cards).

There has been limited improvement, following the recent implementation of remedial actions. Given that these have tended to focus on training and communication initiatives, there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative), there is a need to explore (with received an initiative). to focus on training and communication initiatives, there is a need to explore (with Network Management), more innovative

5. Internal Audit and Risk Management (see Appendix C for detail)



Top Business Level Risks

Risk profiling workshops have been held for the five directorates for which they were scheduled. The outputs are being consolidated with a view to providing input to an ET level refresh of POL's risk profile.

Completed reviews

Since the May 2009 report to the Risk and Compliance Committee, there have been no reports produced for POL

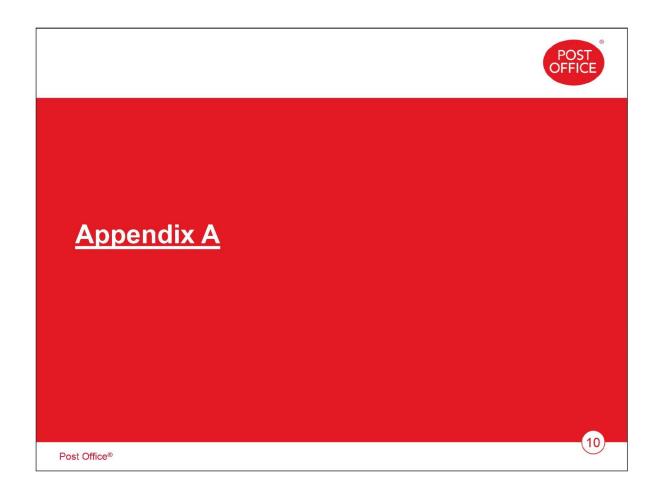
POL Open Actions

There is currently one overdue action from the WH Smith Financial Benefits review. The expected completion date is now mid June.

There are 23 other remaining actions from seven IARM reviews. 21 of these are on schedule.

Of those for which timely completion is at risk, one, relating to Retail Cash Inventory Management, may slip beyond the end of June target date. In the other case, proposed Equal Opportunities legislation may lead to a reconsideration of the validity of the action.

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A1. Supply Chain robbery losses Irrelevant

A2. Post Office Network robbery & burglary losses



Irrelevant

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A3. Supply Chain and Network – Firearms & Injury



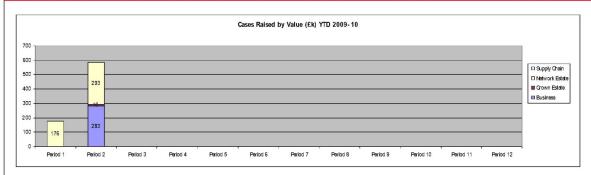
Irrelevant

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A4. Casework - losses by type





Commentary

- Casework losses year to date amounts to £470k in 31 cases with an average loss of £15.1k (Compared to £722k in 43 cases, with an average loss of £16.8k in 2008/09 P2).
- Audit deficiencies year to date amount to £435k, (93% of all casework raised) compared to £313k 43% for 2008/2009 P2.
- An average audit loss of £20.7k per case in 21 cases raised year to date, compared to £28.5k per case for 2008/2009 P2.
- Within the 'Business' heading are matters raised for enquiry that contain 'Multiples' where the fraud loss liability sits with the multiple retailer (e.g. W H Smith's) or matters not linked to any of the other three headings.

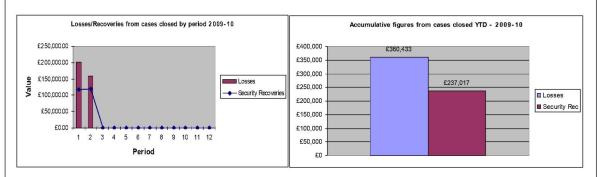
Cases Raised above 50k in period 2 - 2009/10

Case Ref No	Date Raised	Main Case Type	Enquiry Type	Office / Location	Branch code	Initial Loss reported	Current Loss
POLTD/0910/0014	07-May-09	Audit	Cash Loss	WILLESDEN	181005	£81,779.52	£74,880.75
POLTD/0809/0231	29-May-09	Audit	Cash Loss	BIDDICK HALL	412329	£69,000.00	£69,000.00

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A5. Asset Recovery Against Fraud





Commentary

- From all cases closed, year to date £237k has been recovered against identified losses of £360k.
- The current year to date figure for recoveries is 66%.

Mitigating actions, update and status

- The Security Team currently has 56 cases on hand, with a total loss £4.8m being investigated under the Proceeds of Crime Act 2002.
- Through the provisions of the Proceeds of Crime Act 2002 legislation, the security team continue to robustly restrain identified assets. This has
 resulted in significant funds being recovered when cases are progressed to Confiscation that may otherwise have been dissipated.
- Case Reference 0708/0269 was concluded following a Proceeds of Crime 2002 Confiscation hearing at Kingston Crown Court on the 27th May 2009.
 A Confiscation Order of £43.6k was set, this being the available amount from assets identified, of which £25.1k cash had been restrained in various bank accounts. Post Office® Ltd was awarded the full amount in Compensation. A total 'benefit from crime' figure was set at £99.4k. The initial investigation loss was £73k.

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A6. Crown Office Loss Initiative Irrelevant Post Office*

A7. Cheques/Open Items Irrelevant



A9. Commercial Security - Risks and Issues



Project Globe

An initial meeting with the Bank of Ireland has been organised to establish the requirements for POL's new current account

·Horizon on-line

Security have provided concurrence for the Horizon on-line migration process

Travel Money Card

Security are working with the product team and FRES to change the Experian scoring to allow improved sales of TMC without reducing the security of the product

Budget Card

Security are working with the product team in the design of the new PO budget card that will replace savings stamps

Overseas Property Money Transfer (HiFX)

Security have provided support to the product team in the launch of the Overseas Money transfer approving the contract for the service

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Irrelevant Post Office®

A12. Cash In Tills Over Night Cash Holdings (ONCH)







Commentary

- At Period 2 there were 4616 offices over target, down from 4877 in Period 1.
- · The number of offices £25K or more over target was 292.
- Overall value at over target offices is £36.0m, down from £37.3m in Period 1.
- Overall Retail Cash In Tills holdings were under target by £42.5m.

Mitigating actions, update and status

- ONCH 300 this programme of assessing branches payments v cash on hand has almost concluded. The number of branches reduced due to
 various factors and focus was directed towards high risk branches. £327k has been returned from 12 visits to branches and £983k has been returned
 following 14 scripted telephone calls to branches, a total of £1.3m returned. There are 5 audits outstanding, to be undertaken in the next couple of
 weeks.
- A new ONCH programme is planned to commence in July, to include new analysis of branches across the network and further review of lower risk branches not dealt with as part of the ONCH 300 programme.
- The new ONCH programme is subject to discussions around possible activities during the migration of all branches to Horizon Online. Opportunities
 are being explored which may result in a wider piece of ONCH activities within the business, supported by the Security Team.

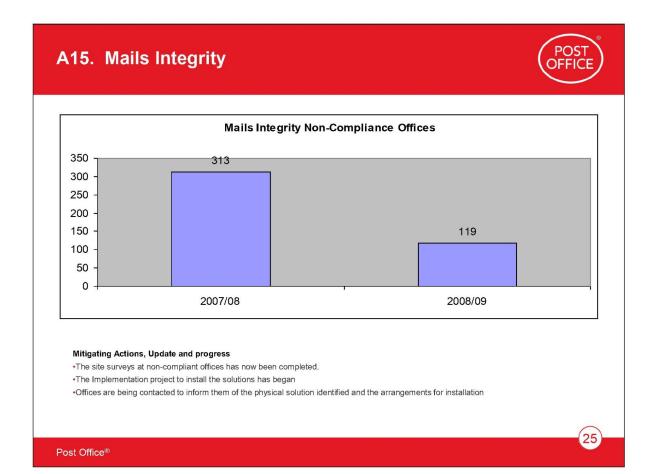
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A13. Automated Teller Machine (ATM) Crime Irrelevant

A14. Lottery Scratchcards



Irrelevant





A17. Crown Office False Alarms Irrelevant



B1. Network Audit Activity



	2009-2010 Audit Activity						
		Annual Plan	YTD Plan	YTD Actual			
E	All Agency Transfers	600	100	150			
Event	All Agency Unplanned Closures	400	68	28			
	Robbery & Burglary Incidents	150	21	2:			
	Cash & Stock Checks all Network	2050	355	414			
Risk	Compliance Testing Agency Branches	1800	310	44			
	Crown Compliance Testing	200	0)			
	Random Test	250	32	7			
Other	Follow Up	200	32	3			
	Cash Centre & CVIT & Swindon	10	3				
	Total	5660	921	117			

Commentary

- The level of audit activity performed to date exceeds the current year to date plan
- Reduced event driven activity has allowed more risk based activity to be performed
- 65% of all audits undertaken up to period 2 have been targeted through risk based selection (including those initiated by P&BA, Cash Inventory, Security and Network Support as well as risk model outputs)
- From the available figures 6% of financial audits (selected on a risk basis), in period 2, resulted in the suspension of the Subpostmaster
- · Net accounting discrepancies from financial audits year to date totals £859k
- 6% of branches audited, year to date, are responsible for generating 79% of accounting discrepancies
- 21 audits year to date have revealed net discrepancies totalling £676k
- An audit was completed at Cygnet House Cash Centre on 12th May 2009 and this identified a "some improvement required" grading

B2. Assurance Activity - Headlines



Topcomm QofS Reporting

The Q1:2009 accuracy audit has now been completed with passes being reported, pending completion of the comparability stage, in all 5 quality of service measures. This is the first time a pass has been reported for Service Provisioning since the beginning of the managed service provided by BT. The decision has now been made by Ofcom to revoke the Topcomm scheme and, therefore, the reporting of the Q1/Q2 results will be the final ones in the current format. We await confirmation from Ofcom on what, if anything, will replace the Topcomm scheme but, in the interim, discussions have been instigated between Compliance, Operations & Marketing to decide how we move forward, pending the result of the Ofcom consultation.

Crown Office Declaration of Compliance

The report on the results of last year's Annual Declaration of Compliance (ADC) has been issued and has included a recommendation for a revised future approach, moving to a quarterly declaration on key themes and using Horizon for a self audit testing. Consideration is also being given to extending a revised approach to parts of the agency network.

Network Change Audits

The Q4 audit, covering October to December 2008, has been completed and the report issued. Four quarterly reviews have now been completed, covering the calendar year January to December 2008, and overall the schemes have been found to be well operated with the bulk of compensation and grant payments made accurately. An IARM review is now awaited, prior to an assurance statement being issued to DBERR, and this review is planned for July 2008.

Assurance Activity in Progress

- Review of the Compliance Framework
- Confidential Waste Assurance Review To ensure that actions, generated as a result of the Information Commissioner Inspections in 2008, have been implemented and review current levels of compliance in the Network.
- Network Change Audit Q1: 2009
- Review of recruitment processes Covering vetting and induction training arrangements (aligned to an action arising from the NS&I audit)

B3. Information Security Risk



Risk	Due Date	Action Owner	BRAG Status
There will be a delay in completing the self assessment questionnaire (SAQ) for Payment Card industry (PCI) on the portal. This is because a Royal Mail Group (RMG) project - OLP2 - insist on a non compliant payment method, instead of using the standard Portal Payment Manager (PPM) which is under development for all transactions processed on the portal PCI compliance is across the organisation, so RMG will not be able to submit their SAQ until all business functions are compliant. If we have a delay in the portal the card schemes will not look favourably upon Post branch, especially should we also have any delay on Horizon Next Generation. RMG have a further risk that by preparing this application to go live without full PCI compliance, the merchant acquirer may prevent live operation. There will be a subsequent knock-on to POL.	April 2009	Sue Lowther	Red
February 2009 All projects have Received Communication from Group Treasury that BT BuyNet has to be used. (Not in Post Office control)			
The Likelihood of risk is now reduced because there is a clearer understanding. Likelihood scoring now 3 and Impact 5 (out of 5).			
March 2009			
The work to implement BT Buynet has been undertaken and implementation is now expected by the end of the month.			
April 2009			
Some work still to do to retrofit BT Buynet solution to existing products. Full implementation is now expected by October 2009			
June 2009			
Travel Insurance have indicated a reluctance to move to BT Buynet at this point in time. This is being followed up, because it will cause problems on PCI certification and also maintenance contract for Retail Logic will have to be renewed for a further year for Travel			
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B3 continued. Information Security Risk



Risk		Due Date	Action Owner	BRAG Status
becomin techniqu an imme gives ris strategio	ice Ltd priorities for a number of group wide functions differ. Our clients are ag more proactive in asking for assurances around data loss and data protection uses (Department for Work and Pensions in particular) for which Post branch need ediate solution. The risk is that RMG are working to a longer term strategy, which e to a lengthy evaluation and large scale project approach. Whilst we endorse that explicative, we need our supplier to provide robust interim solutions now. Our needs as a financial services organisation demand them.	April 2009	Sue Lowther	Amber
	ice working with CSC to commence the Data Loss Prevention programme, CSC pared to go ahead with Post Office at a commensurate price assuming that Group			
progress	tor CSC to further develop and implement DLP (discovery) solution being sed through the IT Roadmap and BCAP process. Working closely with CSC and ensure POL requirements are given appropriate priority.			
as a PO	oe ve expressed some architectural concerns but it is proposed to press-on with this L only solution bought as a fully managed service and not technology. Proposal to xt BCAP.			
June 20 An RMG which cu	09 is project to implement Data Leakage Prevention and Discovery has been initiated uts across the POL only proposal and infers different technology. The risk of tibility on shared infrastructure is too great so the POL only proposal has been			

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B3 continued. Information Security Risk



Risk	Due Date	Action Owner	BRAG Status
Unlike many other Level One merchants in the UK, it appears that Post Office Ltd has escaped fines in 2009 however the delay in undertaking an audit beyond the agreed date of April 2009 could lead Visa to reconsider	April 2009	Sue Lowther	Green
February 2009 PCI project not formally advising Visa and MasterCard of the latest delay because the Pin Pad replacement programme is also considering delaying the replacement of the devices We have started the Audit as of Mon 23rd and there is no doubt our progress will be fed back to the card schemes.			
March 2009 PCI audit is underway as are activities to prepare for any potential Forensic Investigation. Agreement reached that there are controls in place for HNG-X which would negate the need to suspend the system whilst any investigation was underway in the event POL sustained a breach, or more likely, was identified as a potential common point of contact.			
April 2009 Audit progressing well and feedback from the auditors has so far been positive.			
June 2009 Delay in HNGX is causing a delay in completion of the Audit. The fact that we have track 2 data in the Audit Log and not yet removed means the likelihood of a fine from Visa has increased to near certainty, since we will have to admit the presence of Track 2 data in our return at the end of June.			

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C1. Risk Management Maturity Assessment Most recently assessed: March 2009 Status as at 2008/9 Full Year Status as at 2007/8 Half Year 2007/8 Full Year Status as at 2008/9 Half Year **KEY** DESIRED STATE Active executive sponsorship. Risk champion / co-ordinator in place. No activity in place Biannual Risk and Control Self-Assessment sign-off by MD. Awareness and action plann Executive level risk profiling. Business as usual executive level risk and control reporting. Work in progress / under development Risk register in place and operating effectively. Vital Few Controls (VFCs) / Critical Business Mostly established / Controls (CBCs) refreshed and agreed. deployed in key areas Vital Few Controls / Critical Business Controls tested. Capability fully established / Emerging risk process in place. Risk management training in place. % Fill 55% 80% 77.5% 85%

C2. Assignments Planned and in Progress (IA&RM)



Since the report to the May meeting of the Risk & Compliance Committee , no Post Office-sponsored IA&RM assignments completed.

ASSIGNMENTS STARTING IN QUARTER 1 2009/10

Assignment	Objective	Status
POL leavers	Review of the efficiency and effectiveness of the Leavers process within POL	Fieldwork completed
Network Business Support Centre	Review of the processes employed by the NBSC to interface with the POL branch network	Fieldwork in progress
Complaints handling	Review of the efficiency and effectiveness of the Complaints Handling process within POL	Fieldwork in progress
Staff retention	Root cause analysis of high levels of turnover, with specific reference to FSSs	Fieldwork in progress
Business cases	Assessment of the quality of business cases as submitted and the effectiveness of the challenge / approval process	Fieldwork completed; report is in draft
HR performance management	Assessment of whether PALMS is being completed by managers in line with policy and IPP / MUP policies are being correctly deployed.	Fieldwork completed. Draft management letter awaiting final agreement.
Risk profile refresh	Directorate level risk workshops; consolidated results to provide input to POL ET risk profile refresh	In progress. All scheduled workshops completed.

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C2 continued. Assignments Planned and in Progress (IA&RM)



ASSIGNMENTS PLANNED TO START IN QUARTER 2 2009/10

Assignment	Objective	Comments
Agents' remuneration	Assess the effectiveness and reliability of agents' remuneration for Third Party Products	
Direct Channels	Assurance of programme management and governance, and assessment of key programme risks	
Crown Office FSS training	Review of training provided to FSSs to confirm compliance with FSA requirements	
LINK Security Standard self-certification	Provide assurance that POL is compliant with the revised LINK Security Standard	Deferred from Qtr 1
FSA Framework	Review of the effectiveness of POL's response to the Deloitte FSA review completed in 2008/9	
Control accounts	Review of the accounting controls for key reconciliations	Addition to the plan

ASSIGNMENTS PLANNED TO START IN QUARTER 3 2009/10

Assignment	Objective	Comments
Outreach	PIR of the Outreach initiative to determine future viability against other delivery models	
Benefits realisation	Review effective deployment of benefits realisation policy across strategic programmes	
Network conformance	Root cause analysis of non-compliance with POL procedures in branches	Deferred from Qtr 2
Product Development Programme	Assurance of programme management and governance, and assessment of key programme risks	May be deferred
Crown Office Transformation	Review of the Crown Office Transformation Programme / creating an environment that improves the customer experience.	Deferred from Qtr 1

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C4. POL IA&RM Open Actions Summary – June 2009 Key Summary of open actions by month due Not yet due but ability to deliver is in doubt <u>OR</u> Overdue and ability to deliver is in doubt Overdue Due Jun 09 Not yet due, but significant slippage expected OR Currently overdue Due Sep 09 Due Sep 09 Not yet due, but some slippage expected Due Oct 09 Due Dec 09 1 2 3 4 5 6 Not yet due, but on target No. of actions Summary of open actions by review Due Mar 09 WH Smith Due Oct 09 Integrity of Agents remuneration Due Sep 09 Remuneration of Agents for the Sale of POfs Products Due Jun 09 Retail Cash Inventory Management Due Dec 09 Management Information Programme Risk Assessment Due Sep 09 Benefits Management in Strategic Programmes Due Sep 09 Introduction of Reward & Recognition Broadbanding Due Jun 09 Programme Assurance & Financial Benefits Assurance Due Sep 09 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 No. of Actions 38 Post Office®