

Royal Mail Project 2007/08 (RM2007)

SIM 05/2007/04

Target Audience:

**FOD Inspectors,
LA Enforcement Officers**

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Review date: 2011-04-24	Author Unit/Section: Utilities Section, Nottingham

This SIM establishes the main health and safety interventions to be pursued with Royal Mail during 2007/8. This work will include the development and implementation of Local Action Plans together with targeted inspection and enforcement activity.

Aim

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Aim

1 To deliver improvements in health and safety management within Royal Mail, and to address specific local matters. The RM2007 Project will use three different intervention methods; one national and two local.

- Improvement and Engagement Plans for the Royal Mail Group of companies under the Large Organisations Pilot Project. The arrangements for interacting with the company, including the roles of key players are contained in the Engagement Plan (see paragraph 3).
- The development of Local Action Plans in 10 designated Royal Mail areas (see paragraph 7); and
- 4 periods of targeted inspection and enforcement elsewhere (see paragraph 20).

Background

2 Over the last 3 years HSE and Local Authority (LA) Inspectors have conducted a rolling inspection project, examining the standards of health and safety management within Royal Mail's delivery operations. The same period has seen a significant reduction in the total number of RIDDOR reports submitted. Increasingly, project work is being conducted through joint visits to RM premises between HSE and LA Inspectors. This has resulted in a more co-ordinated approach to the inspection of health and safety within the business, and helped to minimise the difficulties presented by the divisions in enforcement allocation.

Large organisations partnership pilot

3 Royal Mail Group plc (comprising of Parcelforce, Royal Mail and the Post Office) are participating in the Large Organisations Partnership Pilot (LOPP), which will see the implementation of a Group-wide Improvement Plan dealing with strategic goals for improvement (e.g. targets for reducing ill health, days lost etc). This project contributes

towards those LOPP objectives in so far as they apply to the Royal Mail part of the Royal Mail Group. LOPP also involves the development and implementation of Engagement Plans. Both the Improvement and Engagement Plan have been agreed at national level with the company and its trades unions.

4 The existing network of HSE Divisional Co-ordinating Inspectors is to be maintained and the arrangements identified in the LOPP Engagement Plan should be followed. Each Division should ensure that a Co-ordinating Inspector for Royal Mail work has been appointed for 2007/8. See Appendix 1 LOPP Engagement Plan for further details.

HSE resources

FOD Division	Local Action Plans (12 days each)	Inspection & Enforcement Phase (7 days each)	B3/4 ops Contact days
W&SW	2	-	24
E&SE	2	-	24
Lon	1	1	19
Mids	2	-	24
Y&NE	1	1	19
NW	1	1	19
Scot	1	1	19
Total	10	4	148

5 Reactive work, including the selection of incidents and complaints, and any resulting enforcement action are unaffected by the intervention mechanisms set out in this SIM. However, there may be synergies between reactive and proactive work from time to time. Inspectors should keep CACTUS Utilities section apprised of enforcement action taken or proposed.

6 The two local level intervention methods are explained in more detail below:

Local action plans

7 The Local Action Plans will build upon the previous national inspection projects and reinforce all the work that has been conducted locally over the last 3 years. In order to achieve sustained improvements, ownership and responsibility for the plan should rest with Royal Mail and its workforce, and the Area General Manager should lead the initiative within the locality. To this end, Inspectors are asked to incorporate both RMs internal improvement targets and those identified by HSE/LAs. The Local Action Plan provides a means of ensuring that Area General Managers pro-actively manage health and safety as part of their normal business operations throughout the entire year.

8 The Local Action Plan aims to secure specific health and safety targets within an agreed time period. The HSE and LAs will oversee the work, providing guidance and assistance throughout the preparation and implementation phases, and assessing compliance at the end of the plan through inspections.

9 The successful implementation of Local Action Plans will require a collaborative approach within Royal Mail's Area Management Teams. The Area General Manager should be responsible for delivering the plan, but the Area Management Team should be instrumental in managing the overall improvement process. The Area Corporate Social Responsibility Lead, and the Customer Service Adviser (Safety & Health) will provide guidance for Area General Managers.

10 **Targeting:** 10 Royal Mail Areas have been identified as being suitable for this particular intervention method. These areas were selected by CACTUS Utilities Section in consultation with Royal Mail on the basis of their potential to benefit most from this approach. HSE Co-ordinating Inspectors will be provided with details of the areas together with a list of contacts for the Royal Mail Areas that fall within their jurisdiction.

11 **Timing:** During April 2007, Inspectors will develop and agree the Local Action Plans; following their launch HSE and the LAs will monitor progress against timetable and conduct a mid-point review (September 2007). Inspections to assess compliance with the plan will be undertaken in March 2008. See Appendix 2 for a sample methodology.

12 **What & where:** Plans are to be developed and agreed in conjunction with the RM Area Management Team, LAs and Trades Unions (TUs). Plans will be developed for 10 designated RM Areas. Delivery is to be achieved using a structured management approach, owned and implemented by local managers and staff, and overseen by the HSE and the LAs. During the implementation phase, LA and HSE staff may conduct inspections to assess progress against agreed milestones. On completion of the plan sample inspections will verify compliance. The intention is to ensure that health and safety is proactively managed throughout the course of the year rather than only being considered reactively following a one-off inspection or as the result of an enforcement notice.

13 **Resources:** For HSE, 12 days should be allocated for each Local Action Plan (see Appendix 2 for breakdown). Each FOD Division will undertake at least 1 Local Action Plan and some will conduct 2. Those FOD Divisions involved overseeing 2 Local Action Plans will not undertake the additional inspection and enforcement phase work as described in paragraphs 20 to 23. LA resource commitments will need to be proportional if joint visiting is to be possible. Therefore, co-ordinating HSE and LA officers are encouraged to make early contact with each other to maintain and develop the joint-working relationships that have made the project so successful over previous years.

14 **Content:** The Local Action Plans should contain targets relating to specific matters of local concern. These matters may be identified from previous inspections or through discussion with Royal Mail and the Trade Unions. Potential matters for inclusion could include issues such as delivery pouch weights, cycle maintenance, the quality/completion of walk logs (risk assessments), footwear on delivery, and workplace transport.

15 The targets should be challenging but capable of being realised by the end of February 2008. The plan will be finite in length and therefore any open-ended targets should be avoided. Longer-term objectives may be considered as long as the contribution required during the plan can be quantified. Milestones should be used in order that progress can be monitored. The Government Communication Network website provides

guidance on setting SMART objectives which will assist inspectors in preparing the Local Action Plan. The broader strategic themes will be addressed through LOPP.

16 The number of targets is discretionary and will be dependent upon the resources required to deliver the improvements within the allocated time period. Generally speaking, if targets are particularly challenging then fewer targets will be set. The Area General Manager should demonstrate ownership of the plan, and be satisfied that the targets although challenging, will be met.

17 **Methodology:** A suggested methodology is presented in Appendix 2, whilst this is by way of example, all plans should contain the following elements:

- Initial Meeting
- Pre-determined milestones
- Mid-point review
- Advisory inspections prior to completion
- Completion Meeting
- Final assessment inspections

18 The format and presentation of the plan is secondary to the content and the targets that it establishes. However, a tabular format may be preferred as it could also be used to record progress, e.g. potential headings of: Target, milestones, Mid-point review, Completion date, Actions that could be updated throughout the year. The plan should be easily comprehensible so that it may be communicated to the workforce.

19 CACTUS Utilities Section stands ready to assist and advise on the plans as they develop (within the usual confines of available resources).

Targeted inspection and enforcement

(only in areas not subject to Local Action Plans)

20 A second local intervention method will also be used during 2007/08, which will see concentrated periods of inspection and enforcement activity. The intention is for this to serve as a catalyst for change and to prompt the active participation of local management in health and safety matters. Additionally, it will bring a degree of balance to the work and help to ensure that health and safety is a consideration for Royal Mail nationally, and not only those areas with Local Action Plans.

21 **What:** Joint and/or co-ordinated HSE and LA inspection of Royal Mail's delivery operations, and with enforcement of required standards.

22 **Timing and Resources:** 4 periods of inspection and enforcement (one per quarter), across those FOD Divisions listed below. Each phase consists of 7 days on-site inspection and enforcement activity.

Inspection and Enforcement Phases	
FOD Division	Timing and Resource
North West	April to June 2007 – 7 days
London	July to September 2007 – 7 days
Yorkshire/North East	Oct to December 2007 – 7 days
Scotland	January to March 2008 – 7 days

23 **Targeting:** A combination of criteria may be used to assist Inspectors in targeting their work. CACTUS has identified potential RM areas for inspection based upon accident profiles, and these will be provided to HSE Co-ordinating Inspectors prior to the project commencing. Inspectors may also choose to revisit offices that were subject to advice or enforcement during previous inspections, in order to assess their progress. The potential for joint visiting opportunities between LA and HSE Inspectors may also determine which areas are selected.

Inspection and enforcement guidance

24 Guidance for Inspectors is available in Appendix 2. Further assistance may be obtained from CACTUS Utilities Section, Nottingham.

Recording

25 Once a Local Action Plan has been finalised a copy should be sent to the LOPP Account Manager (Royal Mail): Mark Dawson, HSE, City Gate West, Toll House Hill, Nottingham, NG1 5AT. A feedback exercise will be undertaken in March/April 2008 when Inspectors will be contacted for their comments.

Training

26 There is no specific training associated with this project. FOD Divisions and LAs are asked to ensure that amongst those participating there is a balance between those inspectors with previous experience of inspecting Royal Mail and those seeking to familiarise themselves with this area of work.

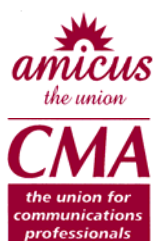
27 HSE and LA Inspectors may gain an insight into the inspection of Royal Mail by reading the 2004/5 and 2005/6 Inspection Reports, and copies of these documents are available from CACTUS Utilities Section, Nottingham. SIMs 05/2004/50, 05/2005/03 and 05/2006/04 provide useful background information in relation to previous inspection projects.

Further advice

28 Further advice on any of the aspects of this project may be obtained from Mark Dawson, CACTUS Utilities Section, City Gate West, Toll House Hill, Nottingham, NG1 5AT. VPN 513 2818, tel 0115 971 2818 or by email at: <mailto:mark.dawson@hse.gsi.gov.uk>.

Royal Mail Group plc

Large Organisations Partnership Pilot Engagement Plan



November 2006 v1.04

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4.0 Implementation of LOPP

The LOPP Model

LOPP employs 5 key elements:

ELEMENT 1
Top level commitment from employer with specific targets set for improvement.

ELEMENT 2
The use of auditing, benchmarking or other relevant methods to prepare an Improvement Plan.

ELEMENT 3
An organisation Improvement Plan agreed with the LOPP partners.

ELEMENT 4
A regulatory Engagement Plan to support delivery and achieve targets.

ELEMENT 5
An agreed process of audit and review of the plans between the employer, employees, trade unions and regulators.

1.0 Introduction to the Large Organisations Partnership Pilot (LOPP)

LOPP is a new initiative seeking to build a more effective relationship between the health and safety regulatory authorities and large organisations.

The pilot involves around 15 large organisations, all of whom employ more than 10,000 people. The participating organisations encompass a wide range of industry sectors (both HSE and LA enforced) , with different corporate structures and varying standards of health and safety performance.

Participation in LOPP does not alter the application of HSCs enforcement policy with regard to the organisations, and nor does it entail any exemption from inspection or accident investigation work. It will however, introduce a more coherent and co-ordinated approach to the organisations relationship with the regulators.

The pilot has two linked objectives:

1. firstly, to present a more coherent, customer focused face to large organisations by identifying an "Account Manager" or Lead Inspector, who will act as focal point for the regulatory contact including 'managing' the multiple approaches which may arise; and offering more consistent approach to inspection of multi-site premises;
2. and secondly, to secure improvements in health and safety outcomes in the pilot organisations and more broadly, if we can involve them in acting as exemplars, influencing the supply chain etc.

This Engagement Plan describes the framework to be adopted for a more effective partnership between Royal Mail Group plc (RM), the Health and Safety Executive (HSE), Trade Unions (TUs) and the Local Authorities (LAs). This Engagement Plan will assist in delivering the objectives and support the work undertaken through LOPP.

1.1 Enforcing Authority

Both HSE and LAs have enforcement responsibility for health and safety legislation within Royal Mail Group plc, with the current arrangements being established in 1988. The resulting split in enforcement allocation between HSE and LAs is shown overleaf.

Enforcement Allocation for Royal Mail Group plc

Business	Enforcing Authority
Post Office Counters	Local Authority
Cash Handling	Local Authority
Sub Post Offices	Local Authority
Royal Mail Letters UK	Local Authority/HSE
Logistics (includes vehicle repair) (part of the Letters business)	Health & Safety Executive
Parcelforce	Health & Safety Executive
Royal Mail International (HWDC Langley)	Health & Safety Executive
<i>Notes: ROMEK Ltd is a separate contracting company and therefore normal allocation guidelines apply</i>	
<i>All purely office accommodation is LA enforced</i>	
<i>All peripatetic accidents (eg on delivery) are reportable to HSE unless they occur on premises allocated to Local Authorities (eg in a delivery office)</i>	

This division in enforcement allocation has in the past sometimes resulted in a fragmented approach to regulatory involvement with the organisation. In order to redress this, and to provide a more coherent approach HSE initiated a 3-year national inspection project in 2004. This project which initially involved only HSE Inspectors has now expanded to incorporate joint visiting with both HSE and LA Inspectors in attendance.

LOPP provides an opportunity to build upon the existing arrangements and to provide a more consistent approach to health and safety regulation within Royal Mail.

2.0 Partnership Arrangements

Working in partnership is the cornerstone of LOPP. Success is dependent upon mutual recognition and consultation. The difference in size, structure and geographical distribution of the respective partners means that an effective communication framework is required to share information and understanding.

2.1 The principles of the partnership

The partnership working arrangements will:

- work towards delivery of the LOPP objectives;
- be built on trust, openness and honesty;
- deliver mutual benefits, greater than those which could be achieved by any partner individually;
- and promote the cultural and economic importance of health and safety.

2.2 Senior Level Commitment

Visible, and emphatic commitment at a senior level is a prerequisite for organisations participating in LOPP, and a statement of intent, based on the principles of this Engagement Plan is sought/has been obtained from each partner.

3.0 A Framework for Engagement

Roles within LOPP:

There are a number of specific job responsibilities associated with LOPP. This section identifies the key roles, but it should also be stressed that LOPP requires the participation (whether active or passive) of all involved with Royal Mail Group, and not just those listed below.

Some of the roles were already in existence prior to LOPP, and these now form the basis of the expanded LOPP network. LOPP will incorporate and build upon existing relationships rather than replace them.

3.1 LOPP Account Manager

The Account Manager will:

- develop robust and sophisticated relationships with RM;
- obtain agreement to the Engagement and Improvement plans;
- deliver a coherent view of Enforcing Authority activity to avoid duplication of effort;
- act as an intelligent gateway for Enforcing Authority engagement with RM;
- and reflect the views of LOPP partners within the relevant Enforcing Authority.

3.2 LOPP Account Director

The Account Director will fulfill a high level role by intervening where necessary to secure resources and behaviours needed to deliver the objectives of the pilot, both internally within the regulatory bodies, and externally with other organisations.

3.3 Royal Mail LOPP Contact

Within Royal Mail, the LOPP contact will provide a focal point for communicating within RM Group and its primary businesses (Parcelforce Worldwide, Royal Mail, Post Office). The LOPP Contact will liaise closely with the LOPP Account Manager to ensure the effective implementation of the engagement framework.

3.4 Trade Union LOPP Contact

At a national level, the Communication Workers Union National Health, Safety and Environment Officer will provide the focus for TU LOPP matters. They will liaise directly with the Account Manager and RM LOPP Contact. Wider

consultation with other relevant Trade Unions will also be actively sought. Representatives of Amicus/CMA will also be involved at national level.

3.5 HSE Co-ordinating Inspectors

Seven HSE Inspectors will be appointed as Divisional Co-ordinating Inspectors for the purposes of implementing LOPP within their own geographical area. This may involve the supervision of project work associated with LOPP and arranging inspections at a local level.

3.6 LA Co-ordinating Inspectors

Inspectors will be sought from within the LA community to act as Co-ordinators for LOPP work within the LA enforced business groups of Royal Mail. Their role will largely mirror that of the HSE Co-ordinators.

3.7 Trade Union Health & Safety Representatives

Representatives from the CWU and Amicus/CMA will liaise with local HSE and LA Inspectors. Their knowledge of local factors will help ensure that interactions are properly targeted, and that LOPP addresses the issues that concern the workforce. Feedback received from Safety Representatives enables LOPP to monitor implementation and performance and to react to changes in circumstance, thereby maximising impact. Safety Representatives will conduct their role in accordance with the Safety Representatives and Safety Committees Regulations 1977.

3.8 Royal Mail Safety Advisers

RMs internal safety professionals will assist in the implementation of the Improvement Plan, and the monitoring and review process. Their understanding of company procedures will help inform the decisions of Inspectors.

3.9 HSE Inspectors

Local HSE Inspectors are responsible for the enforcement of health and safety legislation in peripatetic delivery operations. They will conduct workplace inspections, accident investigations and project work. They will also provide advice for managers and employees and support the work of LA Inspectors, TU Safety Representatives and RM Safety Advisers as may be appropriate.

3.10 LA Inspectors

LA Inspectors (Environmental Health Officers, Technical Officers etc) are responsible for the enforcement of health and safety legislation in Royal Mail premises. They will undertake inspections, accident investigations and project work. They will provide advice for managers and employees and support the

work of HSE Inspectors, TU Safety Representatives and RM Safety Advisors as appropriate.

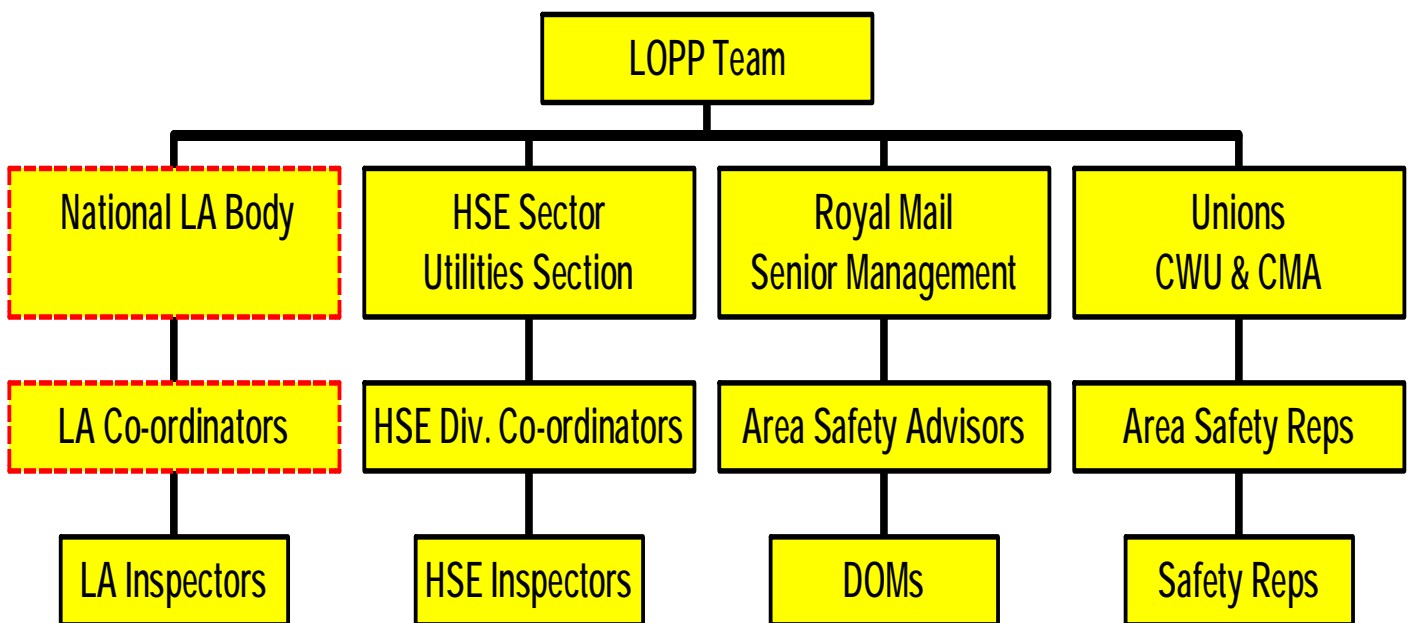
3.11 Communication

The diagram in paragraph 3.11 demonstrates the communication framework to be adopted between the partner organisations. Much of this model has already been realised, but further consultation will be required with regard to the LA regional and national structures. Although hierarchical in structure, the channels of communication are in fact multi-directional with information flowing up, down, and across the management structures. People are therefore able to communicate across organisational boundaries, and in doing so reduce inconsistency and the potential for misunderstanding.

The successful implementation of the LOPP Improvement Plan will require frequent and effective communication between partners. Existing internal communication methods should be used during LOPP (e.g. email bulletins, meetings, intranet, memos etc), and consideration should be given to additional media when communicating externally (eg, extranet, CD-ROM, Newsletters etc).

There is an expectation that liaison meetings between partners (both at a local and national level) will be held to ensure that information and feedback continues to flow freely. The frequency of such meetings will be discretionary, but will be largely dictated by work in progress.

3.12 LOPP Engagement Framework – Royal Mail Group plc



4.0 Implementation of LOPP

LOPP will be implemented using a number of working methods.

4.1 Establishing a baseline

In order to monitor improvements in health and safety performance a baseline standard must first be identified. There are a number of methods available which can achieve this including benchmarking with comparative organisations; auditing; or e-tools such as the Corporate Health and Safety Performance Index (CHaSPI). The most suitable methods will be determined by the LOPP partners, and used as a means of monitoring performance.

4.2 Development of an Improvement Plan

A key element of LOPP is the production of an Improvement Plan, designed to secure improvements in the organisation's health and safety performance. The plan is developed through consultation with the partners, including the workforce. Whilst the plan may be strategic at a high level, there should also be specific targets for the relevant business groups. The plan should be flexible enough to incorporate existing goals, and thereby build on previous work to improve standards.

4.3 Intervention Methods

LOPP will use a number of diverse but complementary intervention methods. Inspection, whilst forming an important part of this strategy, will not be used in isolation. The type of intervention methods adopted will be dependent upon the objectives, but are likely to include:

- Inspection (LA, HSE, TU or joint inspections)
- Research projects
- Investigation
- In house initiatives
- Advice/guidance
- Action Plans
- Awareness raising events
- Published articles
- Enforcement
- Programme/project work
- Technical discipline specialist support
- Joint working on policy formation

Any number of these methods may be appropriate in delivering the targets established within the Improvement Plan.

4.4 Monitoring, Audit and Review

To verify the implementation of the Improvement Plan, a monitoring strategy will be required. The strategy will be agreed between the partners. In order to ensure that no additional burdens are imposed the strategy will be straightforward and fit for purpose, and existing arrangements will be utilised as far as possible.

A variety of performance indicators will be used to assess health and safety performance, using both quantitative and qualitative, and objective and subjective data types. Progress towards the targets established in the Improvement Plan will be measured using the most appropriate method, the exact method being dependent upon the particular nature of the target.

4.5 Further Information

This is a pilot study, and as such the format and methodologies described within this document will inevitably evolve over time. Fundamental changes will be reflected in future revisions of this document.

Further information on any of the aspects of LOPP as applied to Royal Mail Group may be obtained from the Account Manager. Contact details are provided in Appendix 1.

APPENDIX 1

LOPP Appointees 2006/07

Title	Job holder
RM LOPP Contact	Allan St John Holt Head of Safety (RM Group)
Account Director	Marcia Davies FOD Director (Midlands and London)
Account Manager	Mark Dawson HSE Lead Inspector
TU LOPP Contacts	Dave Joyce National H, S & E Officer (CWU) Martyn Bunn (Amicus CMA Sector)
HSE Co-ordinating Inspectors:	
East & South East	Myles Francis
Midlands	David Price
Scotland	Michelle Gillies
Wales & South West	Alan Strawbridge
London	Anne Gloor
Yorkshire & North East	Geoff Fletcher
North West	Jackie Darby
LA Co-ordinating Inspectors:	Andy Netherton (South West)
	Others tbc

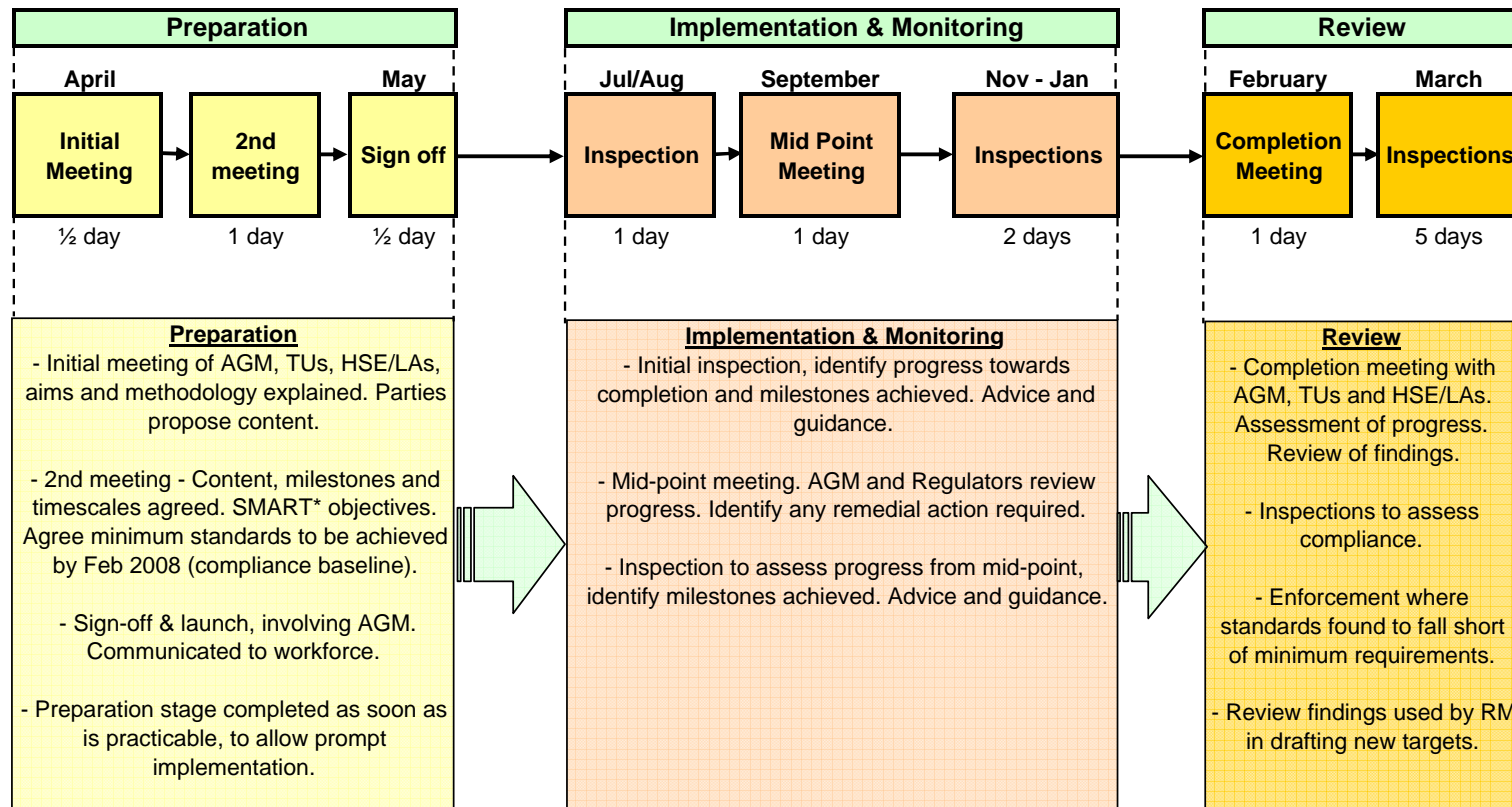
Email addresses and telephone numbers for the above may be obtained through the LOPP Account Manager who be contacted at

mark.dawson@hse.gsi.gov.uk

APPENDIX 2

Royal Mail Project 2007/08

Local Action Plan - Methodology



*Specific, Measurable, Achievable, Realistic, Time-bound

1. See SIM 05/2007/04 para 14 for advice on possible content of Local Action Plan

2. Inspectors are advised that the resources and timings indicated above are by way of example, and the actual format will be dependent upon local circumstance.

Appendix 3 – Inspection and Enforcement guidance

Royal Mail Project 2007/08

Topics for inspection will include:

- Matters contained in the Local Action Plan (where applicable);
- slips/trips/falls;
- Musculoskeletal disorders;
- violence and aggression against postal workers;
- suitability of risk assessments;
- and where joint visiting is undertaken, workplace transport.

Additional project work (e.g. Moving Goods Safely) may be incorporated into RM2007 inspections, but only in areas that are **not** subject to Local Action Plans. The LOPP Account Manager should be contacted if further guidance is required.

Local action plans

The expected outcomes for the Local Action Plan should be agreed at the initial meetings between the regulators and Royal Mail. Expectations should be clearly defined at this early stage, and agreement reached with Royal Mail as to what is achievable. This agreement will help determine whether enforcement action is appropriate following inspections at the end of the project.

During implementation:

Inspectors are asked to conduct inspections during the implementation phase of the Local Action Plans in order that progress may be monitored. Inspectors should identify whether the milestones agreed in the action plans have been reached within the specified time. If not, advice and guidance should be provided to assist Royal Mail in rectifying the deficiencies and to ensure compliance before completion. Only matters of evident concern should result in enforcement during the implementation phase.

Upon completion:

In March 2008 Inspectors are asked to conduct inspections to assess compliance with the targets identified in the Local Action Plan. As the plan is now deemed to be complete, Inspectors should consider enforcement action where significant deficiencies are identified. For example, if the Action Plan requires all walk logs to be complete within a particular area and this has not been achieved then an Improvement Notice should be considered. The nature of any deficiencies and the degree to which they fall short of expected standards will determine whether a notice is appropriate.

Notices should be considered for clear failures in meeting basic legal requirements such as risk assessment and control of manual handling risks.

Preventive inspections unrelated to the project should not be undertaken in the areas subject to Local Action Plans during 2007/08.

Accident and complaint investigation in Local Action Plan areas remains unaffected, and follows normal enforcement guidelines.

Inspection and enforcement

(non Local Action Plan areas)

The enforcement approach should follow-on from previous national inspection work (see SIM 05/2006/04). Where there is evidence of previous advice and there remain significant failings, then enforcement action should be pursued. Having benefited from a 3-year national inspection project, Royal Mail are now familiar with the necessary standards and should be implementing their own policies and procedures to ensure that the statutory requirements are met.

Service of notices

All enforcement notices should be served on the registered office, with copies being provided for RM Managers and Unions locally. The covering letter should be addressed to the Company Secretary, Jonathan Evans, at the registered office (Royal Mail Group plc, 148 Old Street, London, EC1V 9HQ).