

Communications Consumer Panel and ACOD's response to the CCNI's Postal Services Draft Work Programme 2023/24 for Consumer Advocacy in Northern Ireland

About us

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the voice of UK consumers, citizens and micro-businesses is represented in communications policy development.

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular, people who may be in a more vulnerable position in society. We commission research, provide advice and encourage Ofcom, governments, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro-businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in Northern Ireland, Scotland, England, and Wales, respectively. They consult with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Our response

We welcome the Consumer Council for Northern Ireland's (CCNI) attention to the needs of consumers in Northern Ireland (NI) and value our collaboration with them on matters of mutual interest and concern. We work regularly with the CCNI under its postal services advocacy remit and its cross-sector workstreams.

The CCNI's insights to our Northern Ireland Consumer Stakeholder Hub and our UK-wide Consumer Advocacy Hub can always be trusted to deliver the NI consumer perspective reliably and have helped us to shape previous research in a way that is useful to both organisations.

Within the CCNI's postal services consumer advocacy remit, we support their proposed focus on their identified priorities for the year ahead:

- Ofcom's review of the price safeguard cap for letters and parcels (up to 2kg).
- Royal Mail's request to urgently reform the universal postal service and seeking to reduce letter deliveries from 6 to 5 days a week, and wider issues in the parcels market.

- The impact of EU Exit on postal consumers, and micro and small businesses in Northern Ireland that use parcel services.
- Consumer access to postal services at the Post Office.
- Safe and secure access to postal services for consumers in vulnerable situations.
- Postal consumer awareness campaign.
- Improving the Northern Ireland consumer experience across the parcel market.
- Representing the voice of Northern Ireland postal consumers.

The CCNI's remit is wide-reaching and we hope that our sector-specific expertise will enable both organisations to continue to share insights that benefit as wide a range of consumers as possible, in Northern Ireland and across the UK communications sector.

Postal service affordability and fitness for purpose

Our [research](#) has previously focused on the issues faced by postal service users across the UK, including those in Northern Ireland.

We looked at three groups: people living in remote and rural areas; people with accessibility requirements and micro-business owners (with some cross-over across two or more categories).

As a follow-up, we commissioned a small scale focus group on consumer and micro-business postal services experience in the BT postcode area and in 2022 we also commissioned and published a quantitative piece on [the experience of postal users in NI since the EU Exit](#), having sought input from CCNI's policy team in the scoping stages of the project.

We had heard from our stakeholders in NI that the cost of purchasing goods to be delivered to NI from Great Britain (GB) had increased, in terms of the costs of items and the cost of postal surcharges. Consumers and micro-businesses had also encountered problems with obtaining some items from GB as companies had stopped sending certain goods to Northern Ireland.

The findings of the above research studies were not surprising in the context of our stakeholders' feedback, but were alarming in terms of the impact experienced by individual consumers - and micro-businesses, which underpin the UK's economy. We welcome the policy interventions that have taken place since these studies were published, but believe there is continued space for consumer advocacy by CCNI, with our support, to ensure that NI consumers, citizens and micro-businesses get a fair deal.

We also support CCNI's further consideration of the safeguard cap to protect the affordability of the second class 'one price goes anywhere' service. A universal service with affordability and service quality at the heart must remain available to NI consumers, as to all UK consumers, with transparency of parcel delivery pricing and options that enable NI consumers and micro-businesses to afford to send and receive parcels and letters and to expect and offer reliability.

We are pleased to see that CCNI will be commissioning research to better inform Ofcom on the needs of consumers in NI regarding the second class safeguard cap and on Royal Mail's proposed changes to the frequency of its services.

Each year, we commission research to listen to consumers across the UK, boosting the number of survey respondents where relevant, to obtain a good sample for analysis in each Nation and listening to in-depth consumer stories reflecting the experiences of consumers in each Nation.

We have recently commissioned a qualitative study looking in depth into the experiences of consumers living in remote or rural parts of the UK, using communications and postal services.

However, the specific focus that the CCNI is able to give to designing research projects that capture the many voices of NI consumers is vital in informing policy-making and industry service design, to ensure NI consumers are empowered and not left behind.

The many voices of NI consumers

We frequently highlight to policymakers and industry the intersectionality of consumer detriment that exists across the UK and within the four Nations. As pointed out by one of our Panel Members who is from and lives in NI, with a background in Human Rights and Equality in NI, consumers are holders of multiple 'identities' (people can be labelled as 'disabled', 'white', 'mother', 'son', 'retired', 'rural-living', 'gay', 'carer' but they may be a mixture of any of these and more) and a consumer should not be seen as a one-dimensional being.

We believe that postal and parcels services should be inclusive of all UK consumers, taking account of their evolving needs. We also believe that consumers are being made vulnerable by barriers in the communications, postal services and parcels markets, particularly where they are more heavily reliant on those services than 'the average consumer.' EU Exit has highlighted this in respect of NI consumers' and micro-business' access to post from other parts of the UK.

Some consumers can effectively be restricted from benefitting from multiple services that others take for granted, for reasons such as having accessibility requirements, being old or young, speaking English as a second language, having no fixed address, being on a low income, being digitally less confident and other reasons, for example, in postal services, having a 'BT' postcode, or living in a location that providers find geographically more complicated to reach. Having to tackle one of these barriers is a challenge for any consumer. Consumers experiencing more than one barrier to fair service are put at a serious disadvantage.

Vulnerability and inclusive services

We welcome CCNI's advocacy around safe and secure access to postal services for consumers in vulnerable situations.

The vulnerable situation a person is in may be so because of the way that the market is treating them, rather than their personal set of consumer identities. For example, a consumer receiving a parcel is not vulnerable because they use a wheelchair, they are made vulnerable by a parcel delivery company failing to provide adequate opportunities for the consumer to signpost where to leave the parcel so that they can access it, or failing to allow the delivery person enough time to wait for the consumer to get to the door.

Communications and postal services are - in our view and the views of our consumer stakeholders - essential services that consumers from a diverse range of backgrounds, with a diverse range of needs, rely on in their daily lives.

We therefore believe that all consumers should have an equal right to access and use these services effectively, with quality outcomes co-designed with consumers from the outset.

We have urged Ofcom and industry to focus on inclusivity and fairness to all consumers at the heart of their policy and service design, and there is still work to be done.

Proving insights from consumers to inform the policy debate and improve NI consumers' experiences in this sector

As highlighted earlier in this response, and as CCNI knows, we find the meetings of our [Consumer Stakeholder Hub for Northern Ireland](#) invaluable. The meetings, chaired by our Member for Northern Ireland, Rick Hill MBE, who is also the Chair of the Panel and ACOD, enable us to listen to a range of consumers' experiences from cross-sector organisations, on an agreed topic where we can together influence change, such as affordability in the communications and postal services sectors and digital exclusion and skills.

Insights raised by organisations representing NI consumers, citizens and micro-businesses as well as those from the other UK Consumer Stakeholder Hubs are highlighted to policymakers and industry in our summary notes of the meetings, to ensure that the distinct voices of consumers - and specific policy and market contexts - across the four UK nations are fed into their work on an ongoing basis.

The CCNI is a significantly important participant of these Hubs and we know that other participants across the UK appreciate their work, as we do.

Summary

- We believe that the NI's consumers (including micro-businesses and citizens) and all UK consumers, deserve as many 'touch-points' as possible across the consumer landscape.
- We welcome the work that CCNI does that is out of scope of our remit, including their work with on improving access to the Post Office and the NI consumer awareness campaign.



- We welcome all of the evidence-based, consumer-focused organisations we work with voicing the needs and priorities of consumers to provide an equity of empowerment for consumers with profit-making organisations. This is particularly needed to support consumers in ensuring reliable postal services are universally available and affordable.
- We support the CCNI's plans and look forward to the findings of CCNI's proposed consumer research in the year ahead.
- We value our ongoing collaboration with CCNI - a strong and vocal advocate for NI consumers, providing robust and informative insights - and look forward to continuing to work together to influence and advise policymakers and industry.