

Economy and Fair Work Committee:

Consumer Scotland's response to the call for views on Royal Mail service changes

1. Introduction

- 1.1. Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament.
- 1.2. The Act provides a definition of consumers which includes individual consumers and small businesses that purchase, use or receive products or services.
- 1.3. Our purpose is to improve outcomes for current and future consumers and our strategic objectives are:
 - to enhance understanding and awareness of consumer issues by strengthening the evidence base
 - to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
 - to enable the active participation of consumers in a fairer economy by improving access to information and support
- 1.4. Consumer Scotland is the statutory consumer advocacy body for postal services in Scotland.
- 1.5. We welcome the Economy and Fair Work Committee's inquiry into proposed changes to Royal Mail's services and the opportunity to provide evidence on the key issues that the Committee is considering.
- 1.6. Consumer Scotland was established in April 2022. During our first year of operation we have undertaken work to build our evidence base on the experience of postal consumers in Scotland. As part of this work, Consumer Scotland commissioned YouGov plc to survey a representative sample of Scottish adults around their attitudes to postal services. Data was collected between 20 February to 14 March 2023, with a total sample size of 2,007 individuals. The sample was adults aged 16+ in Scotland. The figures have been weighted and are representative of all adults by country, based on age, gender, social grade and region.
- 1.7. This research forms the majority of our evidence base for our response. Specific question wording, sample sizes and charts are provided in the Appendix to this document.
- 1.8. This data has not yet been published and the Committee is being provided with first sight of the preliminary research analysis. These are our initial findings in relation to this research. We will be continuing to undertake further analysis of the data and will be happy to provide further insights from this work to the Committee, should that be helpful, as the Committee progresses with its inquiry.

2. Executive summary

- 2.1. During 2022-23, Consumer Scotland commissioned research into the universal postal service and the current needs and views of individual consumers in Scotland. Our response to the Committee's request for evidence contains data from this research as well as principle based insights on consumer welfare and outcomes. Primarily, our response focuses on four key themes:
 - features of the Universal Service Obligation and their relative importance to consumers in Scotland, including those living in rural or remote rural areas
 - the impact on individual consumers of any potential changes to the Universal Service Obligation
 - the affordability of post as an essential service
 - the need to design postal services in a way that takes into consideration the needs of consumers in vulnerable circumstances.

3. Background context

Royal Mail proposal for 5-day deliveries

- 3.1. In November 2022 Royal Mail approached the UK Government to request that letters only be required to be delivered a minimum of five days each week, instead of the six-day delivery currently provided for by the universal service obligation (USO)¹.
- 3.2. The UK Government has indicated that it currently has no plans to change the minimum requirements of the USO².
- 3.3. Ofcom's review of the Universal Postal Service concluded in March 2022, which set out measures to support Royal Mail's financial stability. The USO requirements, currently set out in legislation, including that of a minimum six day a week letter delivery, were not within the scope of the review.³

Quality of Service standards

- 3.4. Royal Mail is required to meet specific quality of service targets regarding the delivery of key postal services. The UK targets for Royal Mail (excluding three postcodes in Scotland, HS (Hebrides), KW (Kirkwall) and ZE (Lerwick) and during the Christmas period) are:
 - deliver 93% of First Class mail within one working day of collection
 - deliver 98.5% of Second Class mail within three working days of collection and
 - complete 99.9% of delivery routes on each day that a delivery is required
- 3.5. Royal Mail announced on the 12th May 2023 that in 2022/23 it:⁴:
 - delivered 73.7% of First Class mail within one working day

- delivered 90.7% of Second Class mail within three working days and
- completed 89.35% of delivery routes for each day on which a delivery was required
- 3.6. These figures demonstrate a significant gap between the targets set by Ofcom and Royal Mail's current performance. On 15th May 2023 Ofcom announced an investigation into Royal Mail's quality of service.⁵
- 3.7. Of the thirteen postcode areas in Scotland included within Royal Mail's targets:
 - There were five postcode areas in Scotland (AB, DG, EH, G, TD) in 2022-23 where Royal Mail performed better than the UK average of 73.7% for First Class mail delivery within one working day. However, the highest performance achieved amongst these five areas was still under 80%
 - There were two postcode areas in Scotland in 2022-23 (KY, ML) where Royal Mail's performance matched the UK average
 - There were six postcode areas in Scotland in 2022-23 (DD, FK, IV, KA, PA, PH) where Royal Mail's performance was below the UK average
- 3.8. Currently, consumers in Scotland paying for postal services are receiving a poorer standard of service than those set out by the regulator. Research by Citizens Advice in 2022 found that nearly one in four (24%) GB consumers who had experienced a letter delay had faced harm as a result.⁶

Affordability

- 3.9. In April 2023, the cost of a stamp increased by 15% for a First Class stamp from 95p to £1.10 and 10% for a Second Class stamp from 68p to 75p.⁷
- 3.10. The regulation of postal services includes 'safeguard caps' to help ensure that certain services in the USO remain affordable for consumers. The current safeguard cap for Second Class stamp prices runs out in March 2024. Ofcom will be undertaking work in 2023 to review and consult on the scope and level of safeguard caps from April 2024 onwards.
- 3.11. Consumer Scotland will participate in that consultation process.

4. The Committee's Key Questions

Question 1: How important is the current six-day Royal Mail service for letters to your business and/or your community?

Importance of postal services in general

4.1. Our recently commissioned research found that the postal market remains an important service for consumers in Scotland. Around two thirds of participants (65% First Class, 62% Second Class) report that they send personal letters, such as letters or cards to friends and family, or send formal correspondence to service providers such as banks.⁸ Three-quarters of adults in Scotland (78%) report that they send parcels.

- 4.2. For most consumers, their use of the postal service for sending letters and parcels is relatively infrequent. Only 15% of adults in Scotland send a First Class letter more than once a month; and 14% send a Second Class letter. A fifth of adults (20%) send parcels more than once a month.
- 4.3. Figures 1 and 2 in the Appendix to this response provide more detail on these figures.
- 4.4. In considering the significance of postal services for individual consumers, it is important however to also understand the purposes for which consumers are using these services, as well as the frequency. Understanding who consumers are sending mail to, and the type of mail consumers are sending, can provide an indication of why the postal service may be important to consumers.
- 4.5. Our research found that during the past 12 months, consumers who had sent letters in Scotland had sent them to the following recipients:
 - family (63%)
 - friends (54%)
 - government departments (34%)
 - local authority (22%)
 - bank or banking institution (15%)
 - GP or other health care professional (13%)
 - solicitor (13%)
 - insurance company (12%)
- 4.6. Meanwhile, of those consumers who send letters in Scotland:
 - 79% send birthday cards
 - 56% send Christmas cards
 - 42% send personal correspondence
 - 31% send identity documents
 - 14% send insurance information
 - 14% send benefit information
 - 10% send supporting information for help and advice
 - 8% send cheque payment for utilities or other bills
 - 5% send letters to companies they owe money to
- 4.7. Figures 4 and 5 in the Appendix provide more detail on these figures
- 4.8. The data indicates that for many consumers in Scotland the main reasons for using the postal service are for communicating with family and friends around significant events or for personal correspondence. However, for some consumers it is clear that the postal service also remains a channel for engaging with government institutions, public services, financial services, insurance providers, utility companies and the welfare benefits system.
- 4.9. In addition, recent changes regarding the requirement to have photo identification to vote in specific UK elections means that it is likely that some consumers in Scotland will need to use postal services in the forthcoming period to apply for the relevant identification.

- 4.10. In line with our analysis, previous research by Citizens Advice Scotland in 2021 found that one in three (32%) consumers in Scotland regarded delivery of letters as an essential service⁹. This was supported by Citizens Advice research where 40% of GB consumers found letter delivery helpful, and in addition, 32% of consumers thought that it was essential to receive letters through the post.¹⁰
- 4.11. Postal services can be particularly important for certain groups of consumers. Specifically, our research found differences in use of postal services between rural and urban consumers in Scotland. For example, we found that birthday cards (83% vs. 78%), Christmas cards (63% vs. 53%). personal correspondence (47% vs. 40%), sending letters to public bodies (14% vs. 8%) and cheque payments (12% vs. 6%) are more commonly sent by those in rural areas than urban areas.¹¹ Sending letters to family (68% vs. 62%), is significantly more common amongst those living in rural areas than urban areas.¹²
- 4.12. Postal services are also particularly important to consumers in vulnerable circumstances, for example, due to health conditions or low income. Consumers who are disabled or with a long term health condition are significantly more likely to send letters to local authorities, GPs or other healthcare professionals, or government departments. Those earning under £20,000 in gross household income were the most likely to need to send letters to government departments.
- 4.13. Separate research by Citizens Advice aligns with these findings. It found that remote rural consumers (50%), those with a mental health condition (48%), those aged 75+ (42%) and non-internet users (38%) were the most likely groups to state that receiving post was essential. They also found that 1 in 2 (49%) would find it harder to manage their health and 3 in 10 (30%) would find it harder to manage their finances if they could not receive post.¹³

Importance of six-day delivery service for letters

- 4.14. In our recently commissioned survey, we asked consumers in Scotland for their views on the importance of Royal Mail services, including the importance of letter deliveries six days a week.
- 4.15. More than half of consumers (53%) in Scotland regard six-day deliveries as important, with a fifth (20%) regarding these as very important. Those aged 35+ (55%) are most likely to regard delivery six days a week as important to them, when compared to 16 34 year olds (47%). More details on these figures are provided in Figure 3 in the Appendix.
- 4.16. Participants who placed importance on six day a week delivery services by Royal Mail were asked why they felt it was important.¹⁵ They commonly expressed the view that a six day delivery helped ensure that urgent, time-sensitive letters arrived on time and gave them peace of mind. A selection of verbatim responses from our respondents are below:
 - "An example would be, say, a cheque in the post or perhaps a sick line something where I would be keen to receive the post it is a benefit to have a Saturday delivery"
 - "I get nhs [sic] letters that are already delayed, also I have family around the UK as well as US so it's important to me that the communication can be regular."

- "If it takes a few days for a letter to be delivered and it's not going to be delivered at the weekend, you could be waiting a long time before you receive it. This is particularly problematic if it's a letter from a hospital or government agency that involves a deadline."
- "Because sometimes you're waiting for important correspondence and having 6 days of delivery means you might get it sooner."
- "You could be anxiously waiting for correspondence and looking each day for something important"
- "I work Monday to Friday so I am not home receive anything, Saturday I am home and able to receive/sign for post"
- 4.17. These individual reflections from consumers illustrate the points highlighted above about the different reasons why consumers use postal services, the importance of these services to them and their preferences for how they engage with these services.
- 4.18. Alongside consumers' own views on the importance of six-days a week delivery, it is important for policymakers to understand how companies and service providers, across a range of private markets and public services, use the postal service to engage with consumers. Any reduction to a five-day a week letters service may have implications for how different organisations communicate with consumers who rely on physical correspondence, and ultimately may impact on consumer outcomes in these different markets.
- 4.19. This could include, for example, health services where consumers receive notification of an appointment at short notice, or where consumers, who may be financially vulnerable, are in correspondence with government institutions about welfare benefit entitlements and require an urgent resolution to their issue. It is important that any potential changes to postal services are not considered in isolation. A holistic analysis is required to examine how and why consumers use postal services and assess the potential impact of any changes on consumer outcomes across a wide range of other markets and services.
- 4.20. Finally, we would note that while six-days a week deliveries are important to consumers there are other aspects of Royal Mail's services which our data suggests are of even greater importance. In particular, consumers in Scotland ranked recorded delivery, tracking of letters and delivery of letters at a single rate to any location in the UK as the most important aspects of Royal Mail's services (82%, 80% and 77% respectively of participants reported these as important).¹⁶

Question 2: Royal Mail has proposed changing the six-day service for letters to a five-day service. Delivery of letters on Saturdays would end. If this change is made, what impact would this have on your business or community?

4.21. Delivery of letters at the weekend was rated by adults in Scotland as the least important of the Royal Mail services included in our survey, with 48% of consumers viewing this as an important service. Recorded delivery, special delivery, guaranteed next day delivery,

- tracking of letters, single price delivery to all locations across the UK, and six-days a week delivery were all regarded as more important provisions than weekend deliveries.
- 4.22. When we asked research participants about their views on potential changes from 6 days a week to five days a week delivery, over a third (37%) said Saturday was the day they would choose if Royal Mail had to stop delivering one day in the week. This was comfortably the most popular option, with Wednesday scoring the second highest at 16%. This is consistent with the evidence gathered by Citizens Advice Scotland in 2021, which found that 1 in 3 (35%) consumers regarded Saturday as the most acceptable day to lose deliveries.
- 4.23. More detail on these figures is provided in Figure 6 in the Appendix.
- 4.24. Nonetheless, almost half of adults (48%) in Scotland do regard weekend deliveries as an important service. Participants who placed importance on weekend delivery by Royal Mail were asked why they felt it was important.¹⁹ They commonly expressed that they are more free on a Saturday/weekend to receive letters:²⁰
 - "Sometimes I can't be in to receive post on weekdays so if there weren't a weekend delivery I couldn't get it"
 - "If I need something I've ordered ASAP or I need something I posted to arrive ASAP, then that extra day makes the difference between it getting there on time or not."
 - "I get appointments from the NHS. These appointments are sometimes urgent and they never send emails. I also get my prescriptions delivered. Sometimes my Postie is the only one I see."
 - "...[The] weekend is when my husband and I don't work and [the only time we] can arrange for parcels to be delivered on a Saturday."
 - "Letter[s] shouldn't stop at weekends as mostly working during the week and some need time to answer at weekends."
- 4.25. These are important reflections, and it is essential that any future consideration of proposals to reduce weekend postal services takes account of such consumer perspectives. In particular, it is important that consumers who are unable to receive mail during the week do not experience disadvantage, either through having a poorer quality postal service at their disposal, and/or being at greater risk of harm in their engagement with other markets and services.
- 4.26. Finally, we note that if there were any future changes to Royal Mail services to reduce Saturday deliveries then it would be essential for there to be a comprehensive assessment of how other aspects of the postal system operate, to minimise disruption for consumers. For example, even if deliveries were reduced on Saturdays, it would be important for the collection and transportation of letters to continue during the weekend, reducing the potential for further delays in delivery and the risk of detriment this may create for consumers.

Question 3: Are there any businesses, individuals or groups who would be particularly affected by this change?

- 4.27. As set out to our answer to Questions 1 and 2, there are several groups of consumers who may be at greater risk of harm from any reduction in the delivery of letters from six days to five days. These include:
 - Those in rural or remote areas who are more likely to use postal services for a number of types of correspondence than those living in urban areas
 - Those in vulnerable circumstances due to health conditions or low income, who are also more likely to rely on postal services to send specific items of correspondence
 - Those who rely on postal services to engage with essential services, including
 health services, the welfare benefits system and some financial services, where
 there may be greater need for correspondence to be sent and received urgently.
 - Those who cannot afford to use a faster delivery or premium service for urgent mail, such as consumers on low incomes
 - Those who are digitally excluded and who are more reliant on postal services for a range of communications as a result
 - Those who are unable to work from home, who may be particularly impacted upon by any reduction in weekend deliveries if these currently represent the only opportunities when they may be at home to receive or sign for mail.
- 4.28. Marginal delays in deliveries can have disproportionate impacts upon those depending on postal services to complete essential processes.

Question 4: What was your experience of the service provided by the Royal Mail over the last year while the dispute with the CWU (Communication Workers Union) was ongoing?

4.29. Consumer Scotland has no comment on this question.

Question 5: If you are a business, have you stopped using Royal Mail? Do you use Royal Mail in conjunction with other services? What are your reasons?

4.30. Consumer Scotland has no comment on this question.

5. Other potentially useful evidence for the Committee to consider

Affordability of postal services

5.1. As noted above, in April 2023, Royal Mail increased the price of stamps: a 15% increase for a First Class stamp from 95p to £1.10 and 10% increase from 68p to 75p for Second Class stamp.

- 5.2. Consumer Scotland carried out consumer-based research in February 2023, when 2022-23 prices were still applicable and before the new prices for 2023-24 were announced.
- 5.3. Even before the recent price rises our research found that:
 - 67% said First Class stamps (at 95p) were too expensive
 - 53% said Second Class stamps (at 68p) were too expensive
 - 68% said redirection of postal services was too expensive
 - 19% said they would find it difficult to buy a book of Second Class stamps next week
- 5.4. Redirection of mail services allows consumers to receive their key documents at a new address. Ofcom gathered evidence in 2021 on the affordability of redirection services as part of its review of Postal Service. It found that 3 in 10 consumers would not be able to afford to use redirection services at the price of £33.99 for 3 months.²¹ One of the outcomes of the review was that Royal Mail voluntarily agreed a discount for those receiving social security benefits.²² The current price for 3 months of redirection is £36.00,²³ with a concessionary price of £22.50. However, we currently do not have evidence on the level of take-up by those eligible.
- 5.5. In our research, nearly 7 in 10 (68%) consumers in Scotland stated that redirection is too expensive, ²⁴ particularly if they were on lower incomes. Approximately 6 in 10 (63%) consumers in Scotland state that the discount for those receiving social security benefits should be more widely available to those on low incomes. ²⁵ Those with a disability or long term health condition were more likely to state that redirection was much too expensive, with only 1 in 5 saying it was a fair price or cheap.
- 5.6. For some consumers, the price of postal services is particularly challenging. Fifteen percent of consumers in Scotland reported that they have struggled to afford the use of postal services in the past 12 months;²⁶ and of these consumers more than a quarter (28%) have forgone other essentials to pay for postage.²⁷
- 5.7. Overall, these figures regarding affordability suggest that there is extremely limited scope for consumers in Scotland to manage any further price rises in mail services in the future. The figures also highlight the importance of consumers receiving a comprehensive, high quality postal service, given that they currently regard these services as being too expensive.

Decarbonisation of postal services

5.8. The transportation of letters and parcels requires the use of air, road and rail to meet delivery targets and thereby consumer needs. As part of our wider policy work during 2023-24, Consumer Scotland is planning to research aspects of decarbonising the postal sector and how this may change the way in which consumers engage with services. This work will consider how the transition to low carbon methods might impact the postal services that consumers receive. We would be happy to engage further with the Committee as we progress with this work, if that would be of interest to members.

6. Appendix graphs of relevant evidence

30% 40% 50% 60% 70% 80% 90% 100% 50% Less often than once a month 48% 8% Once a month 7% Once a fortnight 3% Once a week More often than once a week 29% Never 32% 6% Don't know/ can't recall 6% ■ 1st class personal letters ■ 2nd class personal letters

Figure 1: Frequency of sending letters

Q1. For the following question, by 'personal letters', we mean any letters addressed to an individual/person, this could be anything from a birthday card to formal correspondence with a bank. How often, if at all, do you send... Base: All (n=2,007)

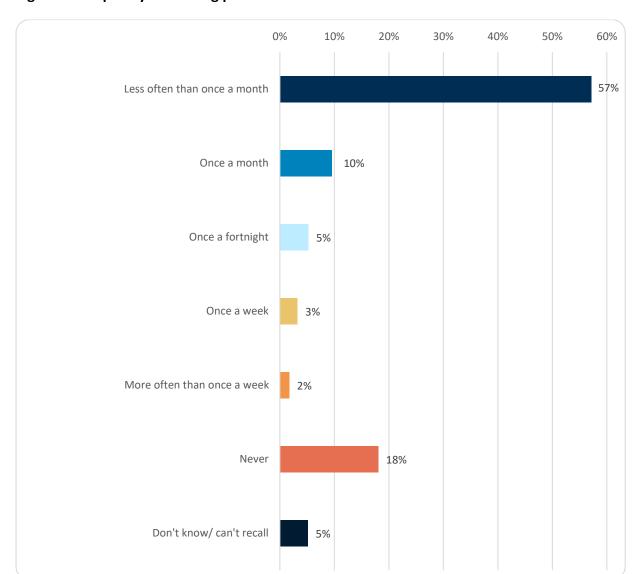


Figure 2: Frequency of sending parcels

Q2. For the following question, by 'parcels', we mean any parcels from a birthday gift to returning something bought online. Please don't include anything connected with your work. How often, if at all, do you send parcels? Base: All (n=2,007)

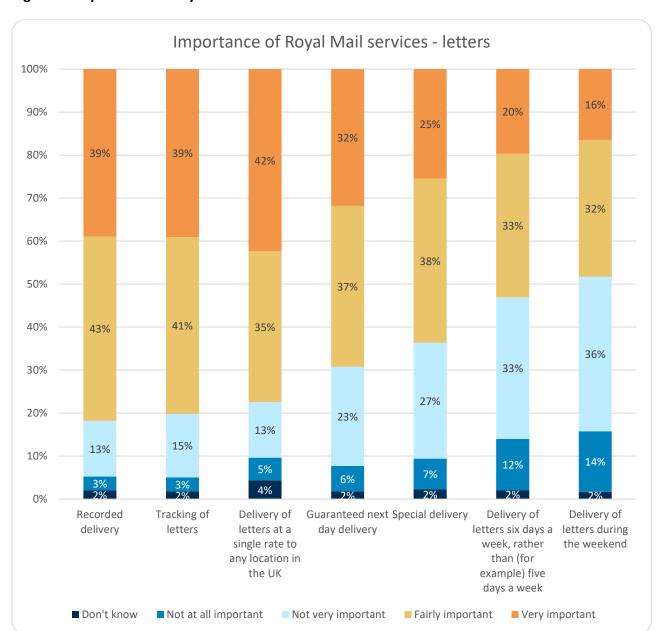


Figure 3: Importance of Royal Mail services for letters

Q5. Thinking about the letters that you send and receive, how important, if at all, are the following Royal Mail services to you personally? Base: All that have sent letters (n=1,443)

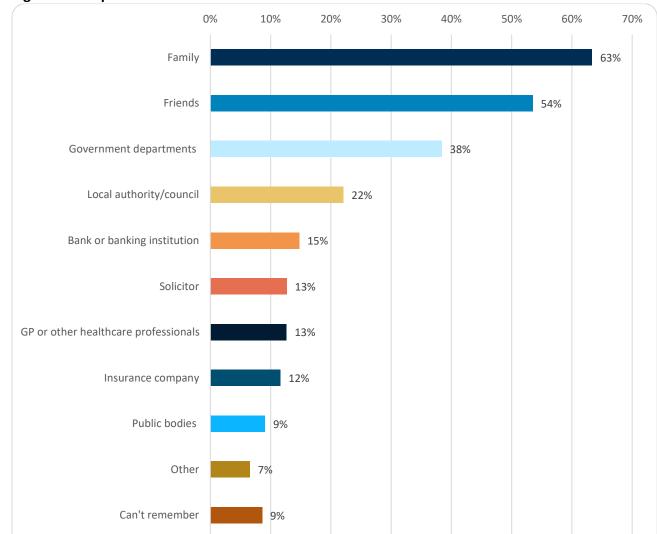


Figure 4: Recipient of letters sent

Q8. Thinking about the letters you have sent in the last 12 months, who were you sending letters to? (Tick all that apply). Base: All that have sent letters (n=1,443).

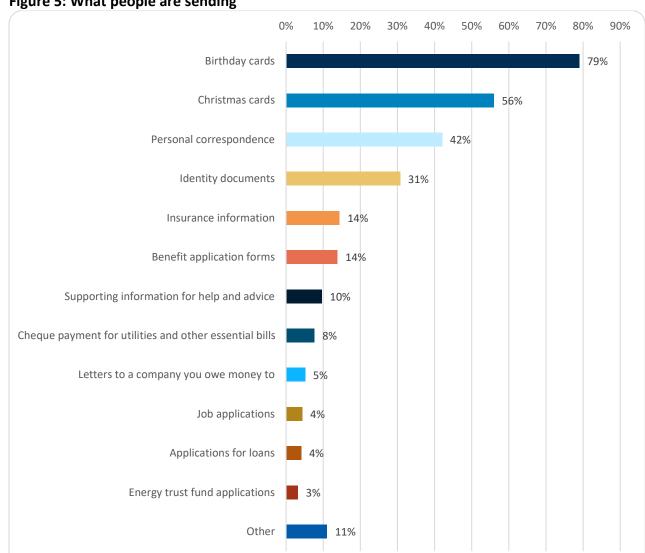


Figure 5: What people are sending

Q9. Thinking about the letters you send, what are you sending? (Tick all that apply). Base: All that have sent letters (n=1,443).

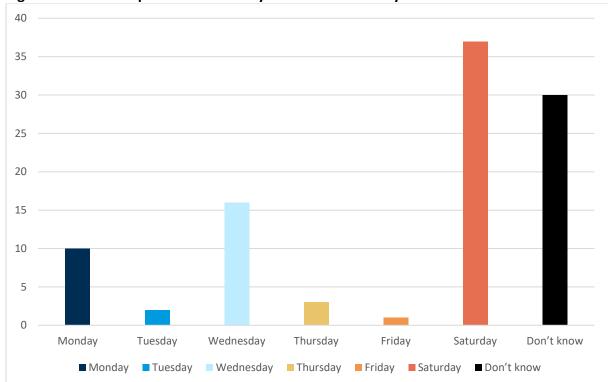


Figure 6: Consumer preferences on day of no letter delivery

Q19. Royal Mail currently delivers letters every day of the week except Sunday... If Royal Mail was to stop delivering on one of these days, which day would you choose? Base: All (n=2,007)

¹ Microsoft Word - IDS plc HY 2022-23 Results announcement (international distributions services.com)

² Written questions and answers - Written questions, answers and statements - UK Parliament

³ Ofcom, Review of Postal Regulation, Statement published 3rd March 2023, point 5.25 <u>Statement: 2022</u> <u>Review of Postal Regulation (ofcom.org.uk)</u>

⁴ Quarterly Quality of Service & Complaints Report (international distributions services.com)

⁵ Ofcom, Investigation into Royal Mail's quality-of-service performance in 2022/23: <u>Investigation into Royal Mail's quality-of-service performance in 2022/23 - Ofcom</u>

⁶ Citizens Advice, State of the Sector, slide 10: State of the Sector | Flourish

⁷ Royal Mail, Prices 2023 | Royal Mail Group Ltd

⁸ Q1. For the following question, by 'personal letters', we mean any letters addressed to an individual/person, this could be anything from a birthday card to formal correspondence with a bank. How often, if at all, do you send... Base: All (n=2,007)

⁹ Citizens Advice Scotland, Postal Services in Scotland: <u>Postal Services in Scotland | Citizens Advice Scotland (cas.org.uk)</u>

¹⁰ Citizens Advice, State of the Sector: <u>State of the Sector report (citizensadvice.org.uk)</u>

¹¹ Q9. Thinking about the letters you send, what are you sending? (Tick all that apply). Base: All that have sent letters (n=1,443).

¹² Q8. Thinking about the letters you have sent in the last 12 months, who were you sending letters to? (Tick all that apply). Base: All that have sent letters (n=1,443).

¹³ Citizens Advice, State of the Sector: <u>State of the Sector report (citizensadvice.org.uk)</u>

¹⁴ Q5. Thinking about the letters that you send and receive, how important, if at all, are the following Royal Mail services to you personally? Base: All (n=1,443)

¹⁵ Q6. Why is it important to you that Royal Mail delivers letters six times a week? (Please type your answer in the box below, giving as much detail as possible) Base: All adults living in Scotland who think it is important that Royal Mail deliver letters 6 times a week (n=766).

¹⁶ Q5. Thinking about the letters that you send and receive, how important, if at all, are the following Royal Mail services to you personally? Base: All who receive letters (n=1,443)

¹⁷ Q19. Royal Mail currently delivers letters every day of the week except Sunday... If Royal Mail was to stop delivering on one of these days, which day would you choose? Base: All (n=2,007)

¹⁸ Citizens Advice Scotland, Postal Services in Scotland: <u>Postal Services in Scotland | Citizens Advice Scotland</u> (cas.org.uk)

¹⁹ Q7. Why is it important to you that Royal Mail delivers letters at the weekend? (Please type your answer in the box below, giving as much detail as possible) Base: All adults living in Scotland who think it is important that Royal Mail deliver letters at the weekend (n=697).

²⁰ ONS dataset, Characteristics of homeworkers, February 2023: <u>Characteristics of homeworkers, Great Britain</u> - <u>Office for National Statistics (ons.gov.uk)</u>

²¹ Ofcom, 2022 Review of postal regulation: Redirection affordability research chart pack: Redirection affordability research chart pack (ofcom.org.uk)

²² Royal Mail, Concession Redirection: Concessionary discount for Redirections | Royal Mail Group Ltd

²³ Royal Mail, Moving home: Redirection: Redirection - Get Mail to Your New Address | Royal Mail Group Ltd

²⁴ For 3 months redirection it costs £33.99 (for one person; an additional person costs £8), and for 6 months it's £47.99 (plus £9 per additional person). Which ONE of the following best matches your view of the cost of the redirection service? Base: 2,007

²⁵ Currently, someone is eligible for a 20% discount on redirection services if they're renting and they receive Universal Credit (including Child Tax Credit, Housing Benefit, Income Support, Income-based Jobseeker's Allowance (JSA), Income-related Employment, Support Allowance (ESA) or Working Tax Creditor) and Pension Credit. This would apply to a 3 month or 6 month UK Redirection... Which one of the following statements is closest to your opinion? Base: 2,007

 $^{^{26}}$ Q13 Thinking about the last 12 months, have you struggled at any time to afford using postal services? Base: 1,714

²⁷ Q14 Did you have to forgo using or paying for essentials, such as food or energy, to pay to use postal services? Base: 262