

Delivering for all

How vulnerable groups access post in Scotland

Who we are

Scotland’s Citizens Advice Network empowers people in every corner of Scotland through our local bureaux and national services by providing free, confidential, and independent advice. We use people’s real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Introduction

Citizens Advice Scotland (CAS) undertakes advocacy on behalf of Scottish consumers in the postal market. We work closely with a variety of stakeholders to highlight concerns and issues that consumers and SMEs face when accessing postal services.

In September 2020, CAS commissioned [Progressive Partnership Ltd](#) to carry out qualitative research exploring the accessibility of postal services¹ for a number of specific groups. The research also examined the impact of the COVID-19 pandemic on access to postal services.

Background

CAS has undertaken previous research which shows that there are barriers to accessing post for certain sections of Scottish communities^{2 3 4 5}. These barriers can include the interception of mail, lack of a fixed address, difficulties in using “care of” addresses and concerns around affordability of services. Some Scottish consumers may be especially at risk of having poor access to post and are more vulnerable to the adverse impacts which can accompany this.

There are concerns that people in the following categories are particularly negatively affected by a lack of access:

- > Asylum seekers and refugees⁶
- > Those who are homeless
- > Survivors of domestic abuse⁷
- > Residents of rural/remote rural areas⁸
- > Members of the Gypsy/Traveller community

These categories are not mutually exclusive, and individuals may fall into one or more of these groups.

¹ When we use the phrase “postal services”, we are referring to both the letters and parcels market.

² [Written Evidence submitted from the Citizens Advice Service \(Citizens Advice and Citizens Advice Scotland\)](#) to the Business, Innovation & Skills Select Committee Inquiry into Competition in the UK postal sector and the universal service obligation (2014)

³ [The Postcode Penalty: How some online retailers are disadvantaging Scottish consumers](#), Citizens Advice Scotland (2012)

⁴ [Remotely Excluded: Barriers Facing Scotland’s Rural Consumers](#), Citizens Advice Scotland (2015)

⁵ [Staying in touch? Exploring Post Office, broadband, and mobile phone accessibility for older and disabled consumers in Scotland](#), Citizens Advice Scotland (2020)

⁶ An asylum seeker is a person who has asked a government to recognise their refugee status and is waiting to hear the outcome of their application. A refugee, once granted that status, is entitled to the same social and economic rights as any UK citizen. Refugees have full access to medical treatment, education, benefits, housing and employment. When we use the term asylum seeker in this report, we also include people newly granted refugee status.

⁷ Domestic abuse is a pattern of controlling, coercive, threatening, degrading and/or violent behaviour, including sexual violence, by a partner or ex-partner.

⁸ Those with a greater than 30-minute drive time to the nearest settlement with a population of 10,000 or more, including island residents.

Delivering for all How vulnerable groups access post in Scotland

Ensuring consistent access to post is important; our post often contains letters and documentation that can change our lives. We rely on postal services to send and receive mail regarding our health and medical care, immigration status, housing, and benefits. Postal communications may also include important legal and financial matters. Any barriers to accessing mail can have serious impacts on our lives, for example by causing people to miss significant events or opportunities. Our findings from this research show that a lack of access to post has a real and detrimental impact on consumers in the groups noted above.

COVID-19

The COVID-19 pandemic and its associated restrictions have significantly affected the way that people in Scotland access postal services. This has had further impacts on those who were already at risk of not receiving post and/or parcels.

- > Some of these impacts of COVID-19 affected all groups. For example, many people in Scotland experienced general delays in receiving mail and difficulty in interacting with postal services, such as Post Offices and Royal Mail delivery offices, which were at times operating with reduced hours and staff numbers.
- > In remote and rural areas, some island residents experienced delays due to reduced ferry services. Residents were also cautious of using ferry services to travel to larger centres for shopping during restrictions and instead increased their use of online shopping. However, this created further complications as many were reluctant to order too much, given restrictions on available ferry freight space or were reluctant to face possible surcharges due to their location.
- > The pandemic has led to major changes for many people who are without permanent housing. Many have been moved into temporary accommodation without shared facilities, mainly B&B and hotel accommodation, in order to reduce the risk of virus transmission.
- > Stakeholders who work with asylum seekers reported that many of the support or legal agencies/ services used by their clients closed their offices during the lockdowns and mail was collected infrequently. This caused potential difficulties where mail was time-sensitive, and the information contained in it related to applications for benefits, housing, or asylum.
- > Similarly, both survivors of domestic abuse and those within the Gypsy/Traveller community encountered difficulties in having post delivered to an alternative address.
- > People with experience of abusive domestic situations reported that there were greater opportunities for perpetrators to intercept mail during pandemic restrictions.

Delivering for all How vulnerable groups access post in Scotland

Asylum Seekers

- > Mail received by asylum seekers may be crucial to their application to remain in the UK and may impact on their ability to gain access to services and funds. They can experience frequent changes in accommodation which are disruptive and increase the likelihood of key pieces of mail going missing.
- > The continuous changes of address and the difficulties experienced in persuading some government agencies, financial organisations, or utility providers to accept the use of certain alternative addresses increase the chances of mail being delayed or missed. For many in this group, the use of postal redirections is not an option to resolve access to post issues due to a lack of awareness of the service, the high cost of the service, and the frequency of address changes.
- > There are also concerns about the effectiveness of services such as recorded delivery in ensuring that important mail is actually signed for and delivered to the right person. There is a risk that mail can go missing or be intercepted, especially in houses with multiple occupancy and transient residents.

Homelessness

- > Having secure access to postal services can allow people to access services and assist in helping them out of homelessness. However, frequent changes of addresses and the lack of a secure and stable postal address can cause significant barriers to accessing post. Some stakeholders emphasised that many significant problems with accessing post are caused by issues within the agencies sending out the mail. Quicker updating of agency systems in relation to new addresses would make it easier for homeless people to access vital services.
- > Difficulties in using of “care of” addresses can prevent or impede people accessing postal services and some participants felt a change of attitude towards such addresses was required by government agencies, financial organisations, or utility providers.
- > The cost of redirection means this is not a practical solution for this group, especially where changes of address are frequent and where people have limited financial resources. Some participants wished to see redirection services made free or cheaper for people legally designated as homeless.

Delivering for all How vulnerable groups access post in Scotland

Remote and Rural Residents

- > Parcel deliveries are hugely important to remote and rural residents as although local shops provide the basics, they can only offer a limited range of goods. For letters, packets and smaller parcels, Royal Mail is the go-to service. As the Universal Service Provider, it delivers everywhere in the UK for a single price.
- > The cost of postage (especially for larger packages which are outside the scope of the Universal Service Obligation), the addition of unexplained surcharges or the application of delivery exclusions for parcel deliveries due to their location are issues which rural communities would like to see resolved. Ultimately, consumers wish to see surcharging brought to a level where it is proportionate and can be rationally justified by reference to objective factors.

Domestic Abuse Survivors

- > For people experiencing domestic abuse problems accessing mail are commonplace and can contribute to the harm being inflicted. Intercepting mail enables perpetrators to monitor the behaviour and activities of survivors unbeknownst to them.
- > The attitudes of many government agencies, financial institutions, and utility providers are often too rigid to enable effective support for those affected by domestic abuse. More could be done by these organisations to ensure postal practices and policies take the needs of those experiencing domestic abuse into account. For example, more flexibility around the use of temporary or alternative secure addresses or collection points for mail would reduce the risk of mail being intercepted.
- > The cost of formal mail redirection services, and the fact that not all items can be redirected, meant that redirection services are not a practical option for many domestic abuse survivors, especially if the perpetrator is controlling their finances or if they have had multiple temporary addresses.

Gypsy/Traveller Community

- > Not having a postal address particularly impacts on those members of the community who travel for part of the year. Obtaining documents relating to vehicles and driving or passports without a permanent address can be very difficult. For those who travel, many believe making it easier to have mail delivered to local Post Offices or held at local Royal Mail depots, via a more flexible *Poste Restante* service, would be helpful and would reduce reliance on “care of” addresses.
- > Residents told us that on many local authority sites Royal Mail deliveries were made to site offices and sorted by the site manager. However, other postal operators often delivered to individual pitches. There were some concerns regarding access to mail where deliveries were made via site offices with the lack of access to mail at weekends being highlighted as problematic. Royal Mail deliveries directly to pitches rather than to the site office would be welcomed by some, particularly in the current situation where site office opening times are restricted due to COVID-19. However, it is apparent from the research that people’s experiences of accessing post differs significantly from site to site and that a “one size fits all” approach to delivering is unlikely to be successful or appropriate.

Delivering for all How vulnerable groups access post in Scotland

Conclusions

Despite the move towards digital services and documentation our research has shown that all communities across Scotland continue to need effective access to postal services. Each of the groups considered in this report have experienced issues that impact on their access to post. Some issues affect several of the groups, such as the cost of redirection services and CAS is aware that Royal Mail are currently reviewing their redirections service.

Specific barriers for each group are summarised below:

- > We found particular barriers to accessing post where groups such as asylum seekers, new refugees and homeless people have continuous changes of addresses in a short period of time.
- > COVID-19 has heightened these impacts, and the pandemic has also resulted in many people experiencing delays in delivery times.
- > Travel restrictions have meant that some people were unable to access alternative pick-up points, such as “care of” addresses.
- > Other services such as Post Office facilities and Royal Mail Delivery offices may also have operated reduced hours, impacting on many people’s ability to access their post.
- > Those in the Gypsy/Traveller community experienced issues with services being unable or unwilling to hold mail for collection for extended periods, or with site offices operating reduced hours.
- > People experiencing domestic abuse or coercive control encountered a greater likelihood of mail being intercepted by perpetrators of domestic violence.
- > The practice of surcharging on parcels in rural areas continues to disproportionately affect rural consumers, at a time when they experienced greater reliance on delivery services, in pandemic and non-pandemic scenarios.

CAS believes that changes are necessary to prevent people in vulnerable circumstances from experiencing the financial hardship, adverse health impacts, and lack of access to public services that can result from lack of access to post. The recommendations suggested below will require action across the board: from Government and Government agencies, local authorities, Royal Mail, Post Office Ltd, delivery operators, retailers, and private companies. We also believe that regulators working with key sectors have a valuable role to play in championing best practice and ensuring that the needs of vulnerable consumers are considered by service providers.



Delivering for all How vulnerable groups access post in Scotland

Recommendations

We believe there are a number of actions that can be taken to improve access to post for vulnerable groups.

In relation to **redirection services** CAS recommend that:

- > Royal Mail should review the affordability of its redirection services. While Royal Mail does offer a concession scheme we believe this requires further development in order to provide a reduced cost variation for domestic abuse survivors, people who are homeless, and potentially other vulnerable groups such as those on low incomes. We are aware of existing social tariff schemes in other sectors, including the Warm Home Discount scheme and in the broadband market. A similar approach should be examined in relation to post.
- > Ofcom should consider the views of stakeholders who provide comment on the need for affordable redirection services for vulnerable groups as part of the current call for input into its Review of Postal Regulation.

CAS believes that the ability to use **alternative addresses and pick up points** including community centres, libraries, Pick-up and Drop-off points (PUDO) and other alternative collection points would help a number of vulnerable groups. We are also aware of several initiatives seeking to develop services like this. For example, Citizens Advice (England & Wales) is calling for the introduction of an Address & Collect service and we are also aware of a Proxy Address service for the homeless which currently operates in London boroughs along with the An Post Address Point service operating in Ireland.

In relation to the **use of alternative addresses**, CAS recommends that:

- > The Scottish Government, COSLA and Local Authorities should consider whether the introduction of similar schemes to the Address & Collect, Address Point or the Proxy Address services would be of benefit in Scotland, especially for those people who may change addresses on a frequent basis.
- > The Post Office Ltd should consider whether their existing *Poste Restante* service could be made more flexible to meet the Gypsy/Traveller community's needs and whether provision could be made for survivors of domestic abuse to access this service. CAS acknowledges that there are some strategic and operational challenges including the need for support for Postmasters and the need to incorporate adequate safeguarding measures.
- > The Scottish and UK Government, and regulators such as Ofcom, Ofgem, the Financial Conduct Authority (FCA), and Competition and Markets Authority (CMA) should consider whether the current practices in their sectors in relation to the use of "care of" or proxy addresses adequately meet the needs of vulnerable groups.

In relation to the **arrangements for sending correspondence more generally**, CAS recommends that:

- > UK Government agencies, financial institutions and utility providers should consider whether copies of correspondence can be sent to a nominated person or alternative secure location, with the client's consent, as a back-up.
- > The DWP should review their procedures for updating addresses on their system so that details are updated more quickly, and the system is more accurate, reducing the risk of items being lost.

Delivering for all How vulnerable groups access post in Scotland

In relation to the needs of **remote and rural consumers**, CAS recommends that:

- > There should be greater transparency for consumers and SMEs in remote and rural areas over the cost of surcharging for deliveries.
- > Retailers and parcel operators should examine their current practices, to ensure that they are explaining charges to consumers at the earliest practicable point in the buying process.
- > Retailers and parcel operators should engage with relevant regulators and consumer bodies to ensure any charges are proportionate and transparent.

In relation to the **Gypsy/Traveller community**, CAS recommends that:

- > The Scottish Government and COSLA should consider postal services as part of their work under the Gypsy/Traveller Action Plan to ensure that public services are responsive to Gypsy/Travellers' needs and preferences. This could include consideration of:
 - > how site users can access post when site offices are closed, particularly over weekends.
 - > whether postal addresses should be established for each individual plot on a site to allow for deliveries directly to each pitch.
 - > whether a more flexible *Poste Restante* service provided by Post Office Ltd would assist in meeting the needs of Gypsy/Traveller communities in relation to postal services.

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