

Post Advocacy

2020/21



Context

2020/21 will see the passage of the Consumer Scotland Bill through the Scottish Parliament and it represents a transitional year for Citizens Advice Scotland's delivery of advocacy on postal services.

At present our expectation is that the levy funded activities on post will transition to the new body, once enacted. To aid this transition, the workplans on the regulated industries, including post, are being presented individually, rather than being included in a broader organisational work plan.



Building on our work in 2019/20 CAS will continue to work on a variety of ongoing issues related to post in Scotland. This will primarily focus on the fairness of delivery charges, in terms of parcel surcharging which continues to be an issue faced by Scottish consumers, and the accessibility of Post Offices and their Outreach services to help ensure that these services are working well for Scottish consumers.

We will continue our work on parcel surcharging which will include working at a UK-level on the Consumer Protection Partnership project on parcel surcharging and with Scottish Government to help progress their Fairer Deliveries For All action plan. Likewise, CAS will continue to explore options for the greater use and positioning of PUDO (Pick Up and Drop Off) points across Scotland to help ensure communities have improved options for the delivery of mail.

Our work related to Post Offices which commenced during 2019/20 will also be continued in terms of disseminating findings and recommendations of our research on Post Office Outreach Services and the accessibility of Post Offices. We will continue to work with a variety of stakeholders to understand and address the issues raised as part of these research projects.

CAS will also continue its regular stakeholder and industry engagement as part of its work on post during 2020/21. This includes engaging with stakeholders in industry, government, regulators, and other advocacy bodies across the UK to ensure sharing of key information and learning which will be of benefit to consumers across the UK.



Postcode Misclassifications

CAS continues to work to make delivery charges more transparent, fair and affordable for goods bought online. However, unfair delivery charges or surcharging continue to be an issue for Scottish consumers particularly for those living north of the central belt.

One possible cause of surcharging is online retailers using ecommerce platforms which misclassify postcodes and attach unnecessarily high prices to packages sent to those areas. The issue of ecommerce platforms being used in this way has been raised with and raised by the Scottish Government, including at its roundtable on parcel delivery charges in June 2018. Following on from this, the Scottish Government's Fairer Deliveries for All action plan, published in November 2018, called for improvements to the accuracy of postcode classification tools (Action 6). The broader issue of surcharging, meanwhile, has been raised through CAS's Postcode Penalty publications between 2012 and 2017, its participation in the Consumer Protection Partnership's parcel surcharging project, and through other collaborative work with the Scottish Government on its Fairer Deliveries action plan. It was also recently discussed at a Members Debate in the Scottish Parliament in December 2019.

CAS wants to establish whether misclassification of postcodes through ecommerce platforms with built in shipping zone classification systems is a cause of or contributing factor to certain unfair delivery charges in Scotland. CAS seeks to understand this issue to a greater extent and then potentially undertake research if this is deemed necessary to gain further understanding. This would then allow for advocacy work to be undertaken with government, regulators, retailers, and, potentially, the software companies themselves, to address this issue if it is found to be unfairly impacting on delivery charges in Scotland.

Postal deliveries and accessibility

Postal delivery issues and accessibility of post more generally can have a wide and varied impact on Scottish consumers. For whatever reason either not receiving a particular piece of post or having problems with post being delivered or being unable to access or receive post at all can have a significant detrimental impact on Scottish consumers.

CAS will explore the issues of lost/undelivered mail and its potential consequences and the wider issues of access to post to understand the impact that this has on Scottish consumers and how some of these issues can potentially be addressed.



Lost/undelivered mail

In terms of lost/undelivered mail CAS will undertake research to understand the impact lost or undelivered mail can have on consumers; and the detriment they may have experienced as a result.

Access to Post

In terms of the wider issue of access to post CAS will undertake research to understand the impact that this can have in relation to specific issues and circumstances in Scotland. For instance; through consideration of issues relating to delivery exceptions; homelessness, domestic abuse, prisoners or those with convictions, those in mental health facilities or care homes, those in the armed forces, those in specific types of employment such as on a seasonal basis, and for particular communities such as the Gypsy/Traveller community. All of these issues or circumstances may mean that individuals do not have a fixed postal address either on a temporary or permanent basis which will impact their ability to utilise and receive post. This research will therefore situate the issue of access to post within the wider devolved Scottish policy context, identify issues or situations where accessing post may be difficult, and the impact that this can have on individuals and communities.



Statement of Principles

Despite various work and research being undertaken unfairness in the parcel delivery market remains an issue in Scotland. This is notwithstanding the Statement of Principles which was developed in 2013 by Scottish Government and a variety of stakeholders including CAS, and which was also subsequently adopted by the UK Government.

While the Principles have been in existence for some time previous research has shown awareness to be low amongst businesses. Given the lack of awareness there is clearly a need to increase awareness, buy in and support for, and adoption of the Statements of Principles by retailers, and also potentially by parcel delivery operators. Consideration may also have to be given to whether the language utilised in the Principles should be updated as part of this.

Current issues around the Statement of the Principle may hinge on its status as a voluntary code of best practice. While not legislating or providing for regulation developing the Principles into a pledge may help with awareness and uptake and behaviour change given previous experiences with other pledges such as living wage accreditation for employers or the Scottish Business Pledge. This in turn will ultimately benefit consumers by ensuring that retailers and potentially parcel delivery operators provide an improved and more consistent service.

This project will help promote the Statement of Principles to ensure that retailers understand the principles and apply them, and also potentially extend this to parcel delivery operators. This will be undertaken via engagement with a number of stakeholders to raise awareness and support for the Principles more widely in Scotland, and via promotional campaigning. A further step will be exploring with Scottish Government the development of the Statement of Principles into a pledge similar to the Scottish Business Pledge.

Funding

CAS has broken down the funding in terms of expenditure on resources and external research required to deliver the research projects outlined in the workplan, and a 'BAU' allocation which covers the cost of staffing to allow CAS to undertake a valuable role, responding to the emerging needs of postal consumers and the industry throughout the year.

Activity	Expenditure
Research and resource costs associated with Post projects	£148,000
Business as usual	£21,000
Total cost	£170,000