

## Response: Citizens Advice Scotland

### Question

**Question 1: Do you agree that there should be an exception to the universal service (i.e. no deliveries or collections) on 2 January when this date falls on a Saturday, beginning with 2 January 2021? Please explain your answer.**

### Response

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.

Citizen Advice Scotland has a duty to advocate of behalf of postal consumers in Scotland at both a local and national level. We welcome the opportunity to respond to this consultation on an exemption for Royal Mail from deliveries and collections on 2<sup>nd</sup> January in Scotland, when this date falls on a Saturday.

While CAS recognises that the 2<sup>nd</sup> January is a public holiday in Scotland, and Royal Mail intends to provide universal services on the substituted bank holiday (ordinarily Monday 4<sup>th</sup> January) any proposed change to services must not detrimentally impact consumers, particularly those in rural areas and vulnerable groups.

As such CAS would recommend that before the exemption is granted/declined:

- Royal Mail consider conducting research or analysis on the impact this exemption would have for consumers, particularly those in rural areas and vulnerable groups.
- Take on board any comments Scottish businesses may have about any potential impact
- Any data on the exemption be shared with advocacy bodies across the UK including CAS

If the exemption is granted:

- It must be clearly communicated to consumers and businesses across Royal Mail's channels well in advance of the 2<sup>nd</sup> of January

Royal Mail is required to provide a universal postal service six days per week, Monday to Saturday. This obligation does not apply on public holidays. The 2 January is generally a public holiday in Scotland although, when this date falls on a Saturday, the following Monday is ordinarily designated as the official public holiday. This would mean that Saturday 2<sup>nd</sup> January would be a normal working day on which Royal Mail would be required to deliver and collect letters. From this statement, CAS recognizes the reasoning behind Royal Mail's request to make Saturday 2<sup>nd</sup> January an exemption.

However, any proposed change to services must not detrimentally impact consumers, particularly those in rural areas and vulnerable groups. This is essential as under [paragraph 4\(2\) of Schedule 6](#) (P.84), Ofcom may only give a direction, approval or consent, if they are satisfied that

an exemption does not discriminate unduly against particular persons or a particular description of persons. Therefore, we would suggest that Royal Mail should consider conducting thorough research or analysis to determine the practical impact this change would have on service users in Scotland and take on board any comments Scottish businesses may have about the exemption's impact.

We request that any data Royal Mail has, or will have, on the impact of this exemption be shared with Citizen Advice Scotland, so that we can work together to give consumer's the best postal experience possible.

Should this exemption be established, Royal Mail and other relevant stakeholders must communicate this to the public and businesses in a proper manner to avoid misinformation and delays to goods and services being delivered. This includes on their website, social media, in operational statements to large business consumers, and at customer service points. We would encourage Royal Mail to request that Post Office branches display posters advising of all non-service days and ensure their Horizon System alerts counter staff (UK wide) that deliveries to Scotland will not take place on Saturday 2<sup>nd</sup> of January, particularly for premium services such as Special Delivery, which are unlikely to arrive within the normal timeframe.

We note that a similar exemption is in place in Northern Ireland for the 12<sup>th</sup> and 13<sup>th</sup> July. We have attached Consumer Focus Post's, now a part of the Consumer Council for Northern Ireland's, [response to that consultation](#) for reference.