

## Ofcom delivery to neighbour consultation

### Response from Royal National Institute of Blind People (RNIB)

#### 1. About us

As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this consultation.

We are a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on government policy and their ideas for change.

As a campaigning organisation of blind and partially sighted people, we fight for the rights of people with sight loss in each of the UK's countries. Our priorities are to:

- Stop people losing their sight unnecessarily
- Support independent living for blind and partially sighted people
- Create a society that is inclusive of blind and partially sighted people's interests and needs.

We also provide expert knowledge to business and the public sector through consultancy on improving the accessibility of the built environment, technology, products and services.

## **2. The importance of the postal service for blind and partially sighted people**

Blind and partially sighted people face many barriers to accessing information and to inclusion in society. To overcome these in the field of reading, they need information in “accessible formats” such as Braille.

Braille is bulky. A short novel, such as *Oliver Twist* by Charles Dickens, takes up four Braille volumes, each A4 size, and about 2cms thick.

Producing Braille is expensive and the quantity produced is limited. The provision of free reading material for blind students, professionals or ordinary individuals wanting access to information or leisure reading became and has continued to be largely the responsibility of non-profit organisations. The dispersal of blind people over wide geographic areas meant that standards of access to information and library services set for the general population could not be easily and cheaply extended to blind people.

Recognising these inherent inequities, Royal Mail has long provided an exemption from postal charges for "Articles for the Blind" to permit access to literacy and learning which would otherwise be too expensive.

These days, articles for the blind include newer formats such as sound recordings and CDs, since the same problems relating to distribution and access continue to apply regardless of format. Royal Mail's modern "Articles for the Blind" service therefore now applies to a wider variety of items which are specifically designed to ensure that blind and partially sighted people can access information and overcome other barriers in society.

Along with the barriers to accessing information that blind people face, the majority of blind and partially sighted people also have greater difficulty in getting around than the rest of the population. Blind people often find travel more costly than others, given that many rely on taxis or public transport which cost more per mile than driving.

Aside from the importance of the Articles for the Blind scheme, many online shops use Royal Mail to deliver goods. Given the mobility problems blind and partially sighted people have, many prefer to shop online.

The postal service therefore fulfils a vital role in bringing goods and accessible information to blind or partially sighted people, so that they do not need to go to the goods or information.

It should be understood that Braille readers in particular are more likely to receive items which will not go through the letterbox. This makes them more likely recipients of the “delivery to neighbour” service.

In summary, therefore, delivery of postal items, particularly “articles for the blind” and parcels, to a neighbour, is important for RNIB and does raise some concerns. We outline these below, and suggest some ways to try to ensure the service works well for blind and partially sighted customers.

### **3. RNIB’s responses to the consultation questions**

*Q1 Do you agree that Ofcom should grant approval to Royal Mail for the Delivery to Neighbour service? If not please explain your answer.*

Before RNIB could agree to this change, we would like to have some assurances about the way that service will be implemented, to ensure that it is suitable for blind and partially sighted customers.

*Q2 Are there other consequences following the roll out of the service across the UK that we have not included in our assessment? If so, please explain.*

Yes, the new service might make it harder for blind and partially sighted people to receive postal items, though if implemented correctly, it could work well. We have the following concerns:

#### **a) Notification in a format accessible to blind and partially sighted customers**

RNIB would like to better understand how Royal Mail intends to notify blind and partially sighted customers of the whereabouts of an item left at a neighbour's house.

Merely putting the standard print slip through the door saying "we left your packet at number 21" would not suffice. This would not be accessible to a blind person, who would need the notification by another

means such as by phone, large print, Braille and so on. An RNIB supporter in NE England said:

*"I find receiving those "Sorry we missed you" cards" so annoying. For one, I can't read them, you can't OCR them with a document scanner as they tend to be hand written and sometimes I don't even realise they have been put through the letter box as they are so small."*

RNIB would like to know whether Royal Mail intends to keep a list of the format needed by blind customers for such notifications.

RNIB understands that currently Royal Mail lets individual postmen/women decide how to notify blind customers of items they were unable to deliver within their own "walk". That might have the advantage of harnessing local knowledge. Indeed, some years back, RNIB gave an award to a postman who, admirably, recorded "while you were out" messages for a blind customer on his walk on a cassette.

However, letting individual postmen and women decide how to notify blind customers of an item left with a neighbour risks an inconsistent service. Furthermore, in large urban areas such as London, temporary staff is often used to deliver the mail. Temporary staff, despite goodwill on their part, will not always have the local knowledge of permanent staff. This could undermine their efforts to ensure blind people are correctly notified of an item left with a neighbour.

Staff cuts at Royal Mail have also led to fewer postal workers with longer rounds apiece, with less time per delivery. We have anecdotal evidence that this time pressure sometimes leads to the card being put through the door and the postal worker moving on before a blind person can get to the door to receive their item. Also, some RNIB staff and members have received cards which lack all of the necessary information to reclaim the item.

## **b) Reclaiming the item**

One blind RNIB supporter in the South East made this comment:

*"In our area the sorting office is about to be moved out of town, which means there will no longer be the opportunity to walk into the sorting office and collect the item. The only way to get there would be by taxi, which is a waste of mobility allowance."*

RNIB would like to better understand how far away the “delivery to neighbour” scheme would allow the item to be deposited from the door of the addressee. Next door might be fine, and save a trip to the delivery office, as the consultation document suggests. But down the end of the street might be worse for a blind person than a redelivery direct to their address on a subsequent day. It should be remembered in this context, as explained in section two, that many blind and partially sighted people have greater mobility difficulties than other customers.

RNIB would like to better understand whether there is there any scope for exempting Articles for the Blind from the "delivery to neighbour" scheme, if (as looks likely) the scheme were to go ahead, or for individuals to opt out of the delivery to neighbour scheme.

Finally, RNIB would like to know whether the scheme will make provision so that a blind person could indicate which neighbour(s) their item could be left at (and which not!)

### **Possible ways to make “delivery to neighbour” work for blind and partially sighted people**

RNIB believes that if this service is implemented, then Royal Mail should make it accessible.

It should be noted that there are no central registers of blind and partially sighted people and therefore Royal Mail would need to implement a system which enables blind and partially sighted people to register their notification needs.

The following measures could be taken to ensure it works well for blind and partially sighted people.

- Royal Mail should train staff to ensure that they make arrangements to notify blind and partially sighted customers of an item left at a neighbour's in an accessible way
- Royal Mail could have a mobile phone or email address registered with them for each blind or partially sighted customer. If the postman/woman unsuccessfully attempt a delivery and have to leave the item with a neighbour, then an automated email<sup>1</sup> could be sent to the registered

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<sup>1</sup> Text to speech technology on many mobile phones and computers mean that many blind people prefer to receive information in this way

email address or phone number of the customer stating where the parcel has been left. Such a system should respect data protection law and privacy considerations. This could be achieved by using a central, automated system to ensure that delivery staff do not see personal phone/ email details

Royal Mail could also

- take special care not to leave the item too far away from blind or partially recipient
- call the addressee's phone number to notify of the item's whereabouts after delivery to a neighbour
- use Braille / large print cards to notify blind / partially sighted customers of a delivery to their neighbour
- keep a list of the accessible format needs of customers within each walk so as to deliver a "left at neighbour" card in a format the customer can read
- make provision for a blind / partially sighted user to indicate which neighbour could receive the item for them.

*Q3 Do you have any comments on the scope and wording of the proposed Notification and approval?*

No

3<sup>rd</sup> August 2012

Dan Pescod  
Campaigns Manager, Europe, International and Accessibility  
Royal National Institute of Blind People (RNIB)  
105 Judd Street  
London  
WC1H 9NE

Tel: +44 (0) 20 7391 2009  
Fax: +44 (0) 20 7391 2395  
email: dan.pescod@rnib.org.uk