



Post Office Network Consultation

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1. Who we are and what we do

1.1 The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI).

1.2 The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers.

2. Post Office Network Consultation

2.1 As the statutory representative for consumers of postal services in NI and with a duty to promote and safeguard NI consumers, the Consumer Council is pleased to respond to the Department for Business, Energy and Industrial Strategy (BEIS) consultation on the Post Office network.

2.2 We note that the purpose of the consultation is to help the government better understand what consumers need from the Post Office network which will help with the application for state aid. It is in this context that the Consumer Council provides its response to set out what consumers here need from the network moving forward.

3. Social Value of the Post Office Network

3.1 The Post Office network provides consumers with vital access to a range of highly valued essential services which are of general economic interest. For instance:

- The postal service;
- Government services eg licensing and identity services;
- Access to pensions and benefits;
- Access to basic and personal banking facilities; and
- Bill payment facilities.

3.2 The Consumer Council notes that the BEIS study¹ estimates the total value of Services of General Economic Interest (SGEI) is £9.3 billion per year.

3.3 This research provides compelling evidence which clearly demonstrates the value of the network to consumers and SMEs across the UK. In this context it is essential to maintain the network and ensure there are adequate consumer protection measures in place.

¹ The Social Value of the Post Office Network. BEIS. November 2016.

4. The Post Office Network in Northern Ireland

4.1 The network in NI consists of approximately 484 branches². This is the largest retail network and many branches are located in areas where other physical access points to SGEI do not exist.

4.2 The network has extensive reach into many communities. Table 1 shows over two thirds (68%) of the branches are located in rural communities and 15% are located in urban deprived areas. These are higher than the UK average. This helps to show how post offices enable many more vulnerable communities to access vital services. No other retail network provides access on the same scale.

Table 1. Percentage of post office branches located in rural, urban and urban deprived areas

	Northern Ireland	UK
Rural	68%	54%
Urban	17%	35%
Urban Deprived	15%	11%

Trust and Value

4.3 The Consumer Council’s recent research³ shows a majority of **consumers trust** the Post Office. Eight out of 10 (80%) consumers gave it at least a score of seven out of 10⁴. It is worth noting the Post

² Post Office Numbers. House of Commons Briefing Paper. November 2016.

³ Consumer Outlook. Millward Brown Ulster. June 2016.

⁴ Scale question. 1 - Don't trust all to 10 - Trust completely.

Office performed better on trust levels than most regulated utility service providers in NI.

4.4 Additionally, many consumers believe the Post Office network represents **value for money**. Two thirds (66%) of consumers gave it at least a score of seven out of 10⁵. Again, the Post Office performed better than many regulated service providers.

4.5 These two indicators help to show the value and importance of post office branches to consumers. They support the findings of recent social value of the Post Office network research⁶.

More vulnerable consumers

4.6 Previous studies⁷ show the critical role the network plays in supporting groups of potentially disadvantaged and vulnerable consumers in NI. One indicator is the extent of post office usage by these groups on a weekly basis. For instance:

- 52% for consumers with disabilities compared to 33% with no disabilities⁸;
- 36% for those aged 55 and over, compared to 18% of those under 55⁹;

⁵ Scale question. 1 - Very poor value for money to 10 - Very good value for money.

⁶ The Social Value of the Post Office Network. BEIS. November 2016.

⁷ The postal consumer perspective: Experiences and perceptions of, and attitudes to, the postal service and Post Office network in Northern Ireland. Consumer Focus Post. March 2013.

⁸ Annual postal services survey 2012. Consumer Focus Post. March 2012.

⁹ Annual postal services survey 2013. March 2013.

- 35 % of rural consumers compared to 21% of urban consumers¹⁰;
and
- 30 % of consumers on lower incomes¹¹ compared to 20% of those on higher incomes¹².

4.7 These findings illustrate the importance of the network to more vulnerable consumers and help to demonstrate the need for continued government support to make sure they still have access to the network.

Consumer needs across the Post Office Network

4.8 Research¹³ by our predecessor body shows what consumers need from post offices across the network. For instance:

- Convenient location;
- Longer opening hours;
- Sufficient range of services;
- Adequate privacy;
- Suitable premises; and
- Informative staff.

4.9 The network now and in the future must meet these expectations. Doing so will make a successful contribution to its sustainability.

¹⁰ Ibid.

¹¹ C2DE socio-economic category.

¹² ABC1 socio-economic category.

¹³ The postal consumer perspective: Experiences and perceptions of, and attitudes to, the postal service and Post Office network in Northern Ireland. Consumer Focus Post. March 2013.

Network Transformation and consumer needs

4.10 A recent report¹⁴ by the Consumer Council looks at the postal consumer experience of Network Transformation Programme (NTP) where branches are changing to a Post Office Local or Post Office Main. It shows many aspects of NTP are working well. One example is the longer opening hours where 85% say this feature is important to them and 99% are satisfied with being able to access services over longer hours. The future shape of and approach to the network and support should make sure these positive consumer attitudes continue.

4.11 However, the report also makes a number of recommendations to Post Office Ltd and Royal Mail on how to improve the postal consumer experience. These include increasing awareness of longer opening hours and focus on improving the quality of service consumers receive at Post Office Locals. Future action in these areas will improve the consumer experience in NI and it will mean this part of the network will better meet their needs.

Outreach services and what to focus on to meet consumer needs

4.12 A study¹⁵ conducted by our predecessor body showed consumer attitudes to outreach services in NI. At the time of the study there

¹⁴ The postal consumer experience: Postal consumers and the Network Transformation Programme in Northern Ireland. September 2016.

¹⁵ Consumer Focus Post. Outreach or out of reach? Consumer attitudes towards Post Office Outreach services in Northern Ireland. April 2010.

were 58 outreach services in NI representing 12% of the overall network. This part of the network consisted of:

- 23 partner outreach services¹⁶;
- 22 hosted outreach services¹⁷;
- 6 mobile outreach services¹⁸; and
- 6 home delivery outreach services¹⁹.

4.13 The report made a number of recommendations for partner, hosted and mobile outreach services including to:

- Increase opening hours;
- Enhance levels of privacy;
- Improve the range of products and services on offer; and
- Consider the case for increasing the days of service.

4.14 This shows what consumers need from outreach services in NI. Additionally, the report viewed the home service as having significant failings and suggested a comprehensive review of this delivery method.

¹⁶ Where a local business runs a post office service from their premises, for example a shop, mainly during the course of normal business hours, under the supervision of a nearby core subpostmaster.

¹⁷ Where a subpostmaster from a nearby core post office visits a community at fixed times and provides a service from a 'host' location, such as a village or community hall, or shop.

¹⁸ Where a subpostmaster from a nearby core post office visits a location in a vehicle fitted with a post office counter and equipment, at fixed times and for a set period of time each week.

¹⁹ Where a subpostmaster from a nearby core post office branch offers a limited service to registered customers, at the door, or at a local 'drop-in session' at a designated place.

4.15 The different research highlighted above helps to show what consumers in NI need across the different parts of the post office network.

5. Question 1: Do you agree that the existing criteria should continue to be used for defining what a nationwide network of post office branches should look like?

And

Question 2: What different criteria or what different approach could government consider to define what a nationwide network of post office branches should look like, including steps to ensure provision of post offices in small remote or hard-to-serve communities?

5.1 The Consumer Council deals with these questions together.

In summary:

The criteria is the minimum level of protection consumers should receive and it is essential this safeguard continues. However, the criteria can be strengthened and we make recommendations on how to do this below.

Post Office Ltd must also continue to fully take account of a range of local factors to make sure consumers have adequate access to their post office.

Key recommendations for the UK Government:

1. Provide a policy commitment that the UK national network will be around its current size and renew the commitment made in 2010 that there will no further post office closure programmes.
2. Make a commitment that the network in the different nations of the UK will be dealt with in a way which delivers equitable outcomes for consumers.
3. Investigate what additional criteria can be adopted to strengthen consumer protection for each nation of the UK.
4. Investigate what additional criteria can be adopted to better protect more vulnerable rural consumers.

5.2 The current criteria is the minimum level of protection consumers should receive especially for those with disabilities, on low incomes and older consumers that live in urban, rural and more remote areas. It is essential that this safeguard continues to protect consumers and ensures that they have easy access to post offices at convenient locations. We understand the government is not proposing to change the existing access criteria and welcome that there is no proposed weakening of this important safeguard.

5.3 However, the criteria should be supported in a number of ways. We discuss these below and would ask that the government considers each of these suggestions.

Government commitment that a national network will remain at its current size

- 5.4 The Consumer Council understands the current criteria could be met with a much smaller number of branches across the UK. It is important to provide a clear policy commitment that a national network going forward means Post Office Ltd must broadly maintain the network at its current size, approximately 11,600 branches, across the UK. This will help to make sure there is universal access for consumers across the UK to SGEI.
- 5.5 The Consumer Council welcomed the previous government's commitment²⁰ that there will be no further post office closure programmes in 2010. This was vital. Previous modernisation programmes²¹ resulted in the closure of a fifth of the network in NI. We would welcome a renewal of this commitment.

Improved consumer protection for each nation of the UK

- 5.6 The Consumer Council would ask for a policy commitment that the network in the different nations of the UK will be dealt with in a way which delivers equitable outcomes for consumers especially for the more vulnerable.

²⁰ Securing the Post Office Network in the Digital Age. Department for Business, Innovation & Skills Policy Statement November 2010.

²¹ Urban reinvention and the Network Change programmes.

- 5.7 The desired outcome of this commitment must mean that no nation should experience significantly less favourable outcomes by future strategic decisions on the numbers and the geographically spread of branches. For instance, our analysis shows that if the UK wide criteria for 90% of the population to be within one mile of their nearest post office were applied to NI today it wouldn't comply with this criterion. Only 73% of the population are within one mile of their nearest post office. NI performs significantly less well than the other nations²².
- 5.8 More effective arrangements should be explored to prevent any issues like this developing further. We suggest that the government investigates what additional criteria could be adopted to strengthen the existing approach. The Council Consumer would welcome further discussions on this matter. We believe this can be designed in a way which provides better protections while at the same time allowing Post Office Ltd the flexibility to manage its network so it meets the changing needs of consumers, and deals with the challenging markets it operates in.
- 5.9 However, the additional criteria should also adequately consider the changing shape of the network in terms of branch model type, services available and opening hours. For instance, large rural parts of NI could be covered by outreach models which operate over fewer days and hours but could still meet the access criteria while reducing consumers' overall access to post office outlets. It is important to avoid and safeguard against this kind of scenario.

²² GIS analysis.

Improved consumer protection for rural communities

- 5.10 The Consumer Council believes that there must be adequate provision of rural post offices especially in small, remote or hard-to-serve communities. We welcome the government's commitment to protect this part of the network.
- 5.11 Rural post offices make up the majority of the network in NI. Over two thirds (68%) of the network consists of rural branches. Our analysis shows that 97% of the rural population in NI is within three mile of their nearest post office²³. This means NI would meet the national access criteria. This must continue.
- 5.12 But as the criteria is UK wide, there is the scope to mask gaps in accessibility in rural areas by any future reductions in the size of that part of the network, similar to what we explained in paragraph 5.7. Further protections are required to prevent this from happening.
- 5.13 As discussed above (paragraph 5.4 and 5.5) we believe a government commitment that the national network will remain at its current size, alongside a policy commitment (paragraph 5.6) that the network in the different nations of the UK will be dealt with in a way which delivers equitable outcomes will help.

²³ GIS analysis

5.14 The government should also investigate what additional criteria could be adopted to better protect more vulnerable rural consumers. One designed for deprived rural areas would benefit remote and hard to service communities. For instance, government should explore a criterion, similar to the one for the urban deprived population, which measures what proportion of the rural population in the lowest 30% of Super Output Areas is within three mile of their nearest outlet in NI. It will be important for the government to further investigate how best to protect rural consumers in these more vulnerable communities.

Local factors

5.15 Measuring accessibility to post office outlets by straight line distance is only part of the picture. The Consumer Council believes Post Office Ltd must continue to fully take account of a range of local factors to make sure consumers have adequate access to their post office. In addition to those highlighted in the consultation, these include:

- Local demographics;
- Travelling time to the nearest post office;
- Understanding local community or political boundary issues;
- Availability of public transport; and
- Deprivation levels.

5.16 These factors complement the access criteria so consumers have access to post offices and they must continue to be taken into account. Without adequate consideration of local factors, consumers

would be at much greater risk of experiencing detriment, as local barriers could prevent them from accessing post offices which the access criteria would not address.

5.16 Indeed, our role working with Post Office Ltd in the Network Transformation illustrates how taking account of local factors improves access to post offices for local communities. For instance, since April 2014 in 60% of those cases where the post office was relocating we worked collaboratively with Post Office Ltd to secure improvements to benefit consumers.

6. **Question 3: What, if any, new services do you think could be offered at post office branches in the future – in particular considering those that could support remote communities, vulnerable members of society and others that rely on over-the-counter transactions?**

In summary:

Consumers want more services offered at post offices including:

- Postal products;
- Government services; and
- Banking services.

Key recommendations for the UK Government:

1. Work with Post Office Ltd to explore if any commercially beneficial deals can be made with other parcels operators and investigate how workable these are, considering Post Office Ltd's relationship with Royal Mail.
2. Engage directly and work with the NI Assembly to see what can be done to support post offices so they provide more central and devolved government services.
3. Work with Post Office Ltd with a view to extend its own brand banking products to NI and to raise awareness about the wide range of services already provided by branches.

- 6.1 It is important for Post Office Ltd to continue to look for new business opportunities. Increasing business opportunities and securing new contracts will help improve its prospects for long term sustainability, ensure consumer access and help meet consumer needs.
- 6.2 Consumers want more services offered at post offices. Past research²⁴ shows that over half of (56%) consumers in NI felt it was important to increase the range of services at their local post office.

Postal products

- 6.3 Currently the Post Office network only provides access to the universal postal service provided by Royal Mail, other Royal Mail services and Parcelforce products. It is essential that access to these vital services continues considering the findings from the recent BEIS study which shows how highly consumers and SMEs value these services.
- 6.4 However, post offices could provide access to other postal/parcel operators' products. Our research²⁵ shows that over two thirds (68%) of consumers would find it useful to be able to access postal products for other couriers and parcel carriers.

²⁴ The postal consumer perspective: Experiences and perceptions of, and attitudes to, the postal service and Post Office network in Northern Ireland. Consumer Focus Post. March 2013.

²⁵ Millward Brown Ulster research. November 2015. Base size 417.

- 6.5 With a universal network across the UK, post offices are well placed to provide access to other parcel providers' products. There is the opportunity in the parcels market to establish if any commercially beneficial deals can be made between Post Office Ltd and other operators which would benefit consumers by increasing their choice in the parcel market and allow consumers to access them at conveniently located one stop shops.
- 6.6 However, given the important relationship between Post Office Ltd and Royal Mail this would need careful consideration so consumers can continue to access the highly valued universal service through the highly valued and trusted post office network.

Front Office for Government Services

- 6.7 Rural consumers require access to more government services at post offices. Previous research²⁶ showed the majority of rural consumers (84%) felt that more government services through the post office would be very useful. While there has been limited success in making the network in NI a Front Office for Government Services, Post Office Ltd should continue to pursue progress in this area. If progress is made, this will help consumers living in more remote communities have access to the valuable services available at post offices.

²⁶ Annual survey. Consumer Focus Post. March 2012

- 6.8 The UK government should work with the NI Assembly to see what progress can be made in this area. In November 2014, the NI Assembly debated²⁷ and agreed on the need for ‘the availability of more public services through the post office network’ and ‘the need for increased support from the Executive to ensure the viability of the network in the future’. This shows the high value the Assembly places on the network here.
- 6.9 We understand the desire for more government services to be provided online but there is still the need for community based delivery of public services. Post offices can still be an alternative option for those consumers that are digitally excluded. In NI, research²⁸ shows that 35% of adults have no digital skills. Additionally, Go ON UK digital exclusion charity analysis shows rural areas here have the highest levels of digital exclusion in NI. This means the post office network is ideally placed to help these consumers.
- 6.10 However, the Consumer Council recognises government services are subject to a competitive tender process. This means Post Office Ltd will need to offer value for money and promote its superior universal coverage which provides face-to-face delivery of services especially in rural areas. We believe strengthening the access criteria as discussed above (paragraphs 5.3 – 5.14) will help put the Post Office network in a stronger position.

²⁷ Assembly debate on the Post Office Network. November 2014.

²⁸ Ipsos Mori research. Go ON UK digital exclusion charity. October 2015.

Banking services

- 6.11 Past research²⁹ offers insight into other services consumers would like to see offered at post office branches. For instance, nearly half of consumers (44%) without a personal current account said they would open one with the Post Office³⁰.
- 6.12 Additionally, a greater proportion (50%) of consumers on lower incomes³¹ and those unemployed, would open a personal account with the Post Office compared to those with higher incomes³² (37%).
- 6.13 More recent research³³ also confirms many consumers (51%) in NI would like to access more banking services including Post Office's own banking account products.
- 6.14 Additionally 10% of consumers in NI do not have a current account compared to 4% of their UK counterparts³⁴. This means post offices branches can help by offering its own banking products to consumers here.
- 6.15 The Consumer Council understands Post Office is piloting its own personal current account offerings in GB but so far this has not been extended to NI. However, as discussed above consumers have an

²⁹ Annual survey. Millward Brown Ulster. March 2014.

³⁰ Base size 147.

³¹ DE social grades.

³² ABC1 social grades.

³³ Millward Brown Ulster research. November 2015.

³⁴ Family Resources Survey NI, Table 4.1: Savings and Investments across the UK, October 2015 (data 2013-14) (A bank account with a payment facility, excluding POCA).

appetite for more banking services and with a significant proportion in NI being unbanked, Post Office Ltd should extend its GB pilot to NI without delay.

Bank branch closures

- 6.16 Our recent Banking on Change report³⁵ highlights the important role post offices can play to make sure consumers have access to banking services³⁶.
- 6.17 Since 2010, almost 30%³⁷ of bank branches have closed in NI. In contrast, the post office network in NI has remained stable. There are 250 bank branches in NI. The Post Office network has 484. This shows the potential of the network because of its geographical reach.
- 6.18 The Banking on Change report also found that consumers with disabilities are significantly affected by bank branch closures. We also know that post offices are more frequently used each week by those with disabilities (52%) compared to the overall weekly usage which shows 25% visit a post office at least once a week. This means post offices are a vital access point for this consumer group and will become more important in future with the trend in bank branch closures likely to continue. With more banks closing, it is important that Post Office Ltd makes sure its outlets, where required, can be

³⁵ Banking on Change? Consumer Council. November 2016.

³⁶ Ibid.

³⁷ Ibid.

adopted to ensure they are capable of handling increased consumer footfall. Banks and Post Office Ltd should work together on this so consumer needs are fully met.

Promoting existing services

- 6.19 The Council Consumer believes, alongside looking at what other services could be available, Post Office Ltd should consider additional ways its product range can be advertised in a way which improves consumer awareness. This could increase consumers' usage and help increase revenues which could assist the parts of the network which are less sustainable.
- 6.20 Many consumers are not aware of the full range of existing services provided at post offices. For example, our Banking on Change report shows almost half of consumers (49%) were not aware you could access personal banking accounts at post offices. Additionally, consumer feedback from focus groups³⁸ demonstrates that consumers are not aware of all the services provided at post offices. This means post offices could be losing out on valuable business. The Consumer Council is committed to working with Post Office Ltd and banks to help improve consumer awareness.
- 6.21 Additionally, a strategic awareness raising campaign on the wider range of services provided by post offices would have a positive effect on consumers and the post office network. This would also

³⁸ Consumer Council facilitated focus groups that took place during January 2015.

complement the ongoing activity around promoting longer opening hours provided by the Network Transformation.

7. Question 4: What ways do you think communities might be able to play a more significant role in the operation of the post office network, in particular with the objective to support rural economies and strengthen local communities?

In summary:

The Consumer Council is supportive of community initiatives that provide sustainable solutions and make sure consumers continue to have access to post offices which meet their needs. But they must receive sufficient government support to be workable, sustainable and successful.

Key recommendations for UK Government:

- 1.** Make sure any community initiatives to operate post offices receive sufficient support including adequate ongoing funding, training, technical support and robust service level agreements with Post office Ltd.
- 2.** To work closely with the NI Assembly to identify any strategic opportunities for community run post offices in NI.
- 3.** Provide more information to and discuss with key stakeholders,

how significant this approach would become and how it would work in practice before any final decisions are made.

Importance of Post Office to local communities in NI

- 7.1 Communities have a special relationship with the network. Many consumers, including those in rural areas, already view post offices as community hubs. For example, previous research³⁹ shows 78% of consumers, including those in rural areas, feel their local post office plays an active role in enhancing community relations. Additionally 93% feel it is a trusted institution. This illustrates the positive social role of the network.
- 7.2 The Ballygally Post Office is an example of the role a post office plays in the local community. It operates from a premise with a separate community hall for social events and activities throughout the year which benefits rural consumers and the local branch. This approach helps improve social inclusion and means the local community continue to have access to the valuable services provided by the post office.

Communities playing a more significant role in operating the Post Office network

³⁹ Annual postal services survey. Millward Brown Ulster. December 2008.

- 7.3 The Consumer Council is supportive of community initiatives that provide sustainable solutions and make sure consumers continue to have access to post offices which meet their needs. This is an option if a community is faced with an unavoidable closure. But we are more cautious about this type of approach playing a significant role in the operation of the network without further evidence on what this looks like and an assessment on whether it is a sustainable solution.
- 7.4 Earlier in our response (paragraph 4.8 – 4.15) we highlighted what consumers need from their post offices. Any wider roll out of new delivery mechanisms must meet these needs if they are to be successful and sustainable.
- 7.5 The Consumer Council seeks a number of assurances. For instance, that any community initiatives that run post offices would receive adequate ongoing funding, training, technical support and robust service level agreements would be developed with Post Office Ltd so consumers receive a reliable level of service. Alongside this there will be the need for robust contingency planning to address the risk of service disruptions if communities for whatever reason were unable to operate post offices.
- 7.6 We would also suggest that the UK government works more closely with the devolved administration to identify any strategic opportunities for community run post offices in NI.

7.7 The Consumer Council requires more information from the UK Government about how significant this approach would become and how it would work in practice. This will allow the Consumer Council to provide more detailed comments. We look forward to further discussions once the proposals are developed further.

8. Question 5. Do you have any other views on the points raised in this consultation that you feel government should consider regarding its approach to the post office network?

In summary:

The Consumer Council welcomes the UK government's ongoing commitment and funding support which is modernising and maintaining the size of the Post Office network. It is vital that this support continues and that rural post offices are protected.

Key recommendations for UK Government:

1. Provide more information about the make-up and location of the 3,000 outlets which the government intends to secure and how their future will be protected.
2. Consider applying a no avoidable closure policy if no other post office is within 0.5 miles and continue to support the Community Brand Fund.

3. Investigate with Post Office Ltd the introduction of a formal key performance standard to complement the access criteria. This should assess the quality of service consumers receive across the network. In rural areas, it should monitor opening hours, days of the service and product availability to make sure consumers get sufficient access to the essential services provided at post offices.

Importance of Government commitment and financial support

- 8.1 We welcome the UK government's ongoing commitment and funding support which is modernising and maintaining the size of the Post Office network across the UK. Without it we would have a much smaller network and consumers would be forced to travel further to access essential services.
- 8.2 In 2006, publically available information⁴⁰ suggested that a commercial network of post offices would consist of about 3,600 – 4,000 branches. A network of this size would adversely affect consumers and communities across NI and other parts of the UK.
- 8.3 With government's support, in 2016 the network across the UK has approximately 11,600 branches⁴¹ and the number of post offices in NI has remained stable since 2008. This means NI consumers continue to have access to post offices in the rural and urban deprived

⁴⁰ DTI. The Post Office Network.: A consultation document. December 2006.

⁴¹ The Post Office Ltd. Network Report 2015.

communities that need them most. Therefore, it is vital that government continues to support the network.

Protecting 3,000 rural post offices

- 8.4 We are pleased that the consultation document states the government is committed to protecting rural post offices and will secure the future of 3,000 rural outlets.
- 8.5 The Consumer Council understands that there are over 6,300 rural post offices across the UK⁴². We would ask for more information about the make-up and location of the 3,000 outlets which the government intends to secure. We would suggest this is discussed in the decision document.
- 8.6 More detail is needed on how the 3,000 outlets will be protected. For instance, one option would be to apply a no avoidable closure policy if no other post office is within 0.5 miles. We understand this is similar to past protections on parts of the Post Office network before the access criteria was implemented in 2006. Also, the Community Branch Fund has benefitted consumers in more rural parts of NI so the UK Government should consider making sure it extends this. We look forward to the UK Government detailing how it intends to protect rural branches.

Key performance standard

⁴² The Post Office Ltd. Network Report 2015.

8.7 The Consumer Council would like to see a formal key performance standard implemented to complement the access criteria. This standard should be based around the consumer needs discussed above (paragraph 4.8 – 4.15). Across the entire network this should look at:

- **The quality of service:** It is important to understand consumers' attitudes towards the quality of service they receive across the network and to proactively identify any issues that need addressed. This measure would include convenience of location, local accessibility, opening hours, the range of services provided and the in-branch experience across the different operating models.

8.8 In rural areas the standard should also monitor performance in the following areas against the relevant benchmarks:

- **Opening hours and days of the service:** There should be a minimum number of opening hours and days per week for all outreach services. This could also be applied to any community run post offices in more remote rural areas where Post Office Ltd is unable to provide a full service and is faced with an unavoidable closure.
- **Product availability:** A minimum range of products guarantee at any rural post office outlet would benefit consumers. This

guarantee could set an ambitious product retention rate compared to a branch which offers a full range of services. It will also be important for Post Office Ltd to exceed this target by seeking to improve the product range available at these branches.

- 8.9 An annual assessment across these key areas would provide a way to monitor the performance of the network across the UK and across the various different delivery models to make sure consumer needs are being met.

9. Contact details

- 9.1 If you wish to discuss any aspect of this response please contact:

- Kellin McCloskey on 028 9025 1637 or by email on kellin.mccloskey@consumercouncil.org.uk; or
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