

# Stamp Out Complaints



December 2018



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## 1. Executive Summary

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### 1.1

This report is part of The Consumer Council's partnership approach with Citizens Advice and Citizens Advice Scotland to review complaint handling in the postal market. This is the first in a series of reports by the Consumer Advocacy Bodies<sup>1</sup> on postal complaints.

### 1.2

The study included a review of:

- **UK consumer reviews on Trustpilot.** This shows many UK consumers have had reason to complain about the service they have received from postal operators and parcel brokers<sup>2</sup>.
- **Postal operator and parcel broker websites.** The desk based audits of postal operator and parcel broker websites demonstrate improvements are needed so consumers can easily find complaint procedures. Postal operators and parcel brokers should also ensure

their complaint procedures are transparent and simple for consumers to follow.

- **Citizens Advice's Twitter analysis.** This shows the number of consumers who have complained or expressed dissatisfaction across the postal market between September 2017 and August 2018. This peaked around December 2017 when consumers made their highest volume of negative twitter comments. This reinforces the need for operators to have adequate complaint handling procedures which are visible, transparent and simple for consumers to follow.
- **Ofcom's residential postal tracker research on the consumer experience of postal problems with operators.** This shows the proportion of UK consumers who experienced problems with operators that

do not go to make a complaint. The findings related to Royal Mail illustrate when consumers do complain, the main way they find out about how to complain is by visiting its website. This helps to show the importance of having a complaint procedure which is easy to find on websites.

- **The Consumer Council's vulnerable postal consumer research.** This provides some insight into why those consumers in Northern Ireland who have a postal complaint do not complain. The main reason is because they think it is too much hassle. Those with a disability were most likely to say they thought it was too much hassle. This means a complaint procedure should be hassle free, simple to follow and transparent.

## Recommendations

### 1.3

The Consumer Council has proposed the following recommendations:

- Postal operators and parcel brokers should review their complaint procedures to make sure they are visible, transparent and easy to use for all consumers. These should be easily accessible on operator and broker websites.
- The Consumer Council will work with Citizens Advice and Citizens Advice Scotland to produce a complaint handling best practice guide which will help with a review process.
- Ofcom should also provide guidance to postal operators on what they need to do so they comply with the regulatory condition for complaint handling<sup>3</sup>. If improvements are not made within an agreed timescale, Ofcom should consider how best to make sure consumers have access to easy to use, and transparent complaint procedures.
- The Consumer Council will continue to work with Citizens Advice and Citizens Advice Scotland to explore ways in which postal complaints processes can be improved.

<sup>1</sup> The Consumer Council, Citizens Advice and Citizens Advice Scotland.

<sup>2</sup> A parcel broker is an intermediary between customers and courier service providers. A parcel broker can accumulate a higher parcel volume and therefore negotiate cheaper prices from postal operators.

<sup>3</sup> Ofcom Consumer Protection Condition 3. Complaints Handling and Redress. 3.2 Obligation on postal operators. March 2017.

## 2. Background

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### Who we are and what we do

#### 2.1

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.

#### 2.2

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.

#### 2.3

The Consumer Council is a designated consumer body under the Enterprise Act 2002 and the Financial Services and Markets Act

Order 2013. Designated consumer bodies can raise a super-complaint to the Competition and Markets Authority (CMA), in the case of goods and services, and the Financial Conduct Authority (FCA) or the Payment Systems Regulator (PSR) as appropriate, in the case of financial services if a market in the UK is, or appears to be, significantly harming the interests of consumers.

### Complaint Handling in the Postal Market

#### 2.4

All postal operators<sup>4</sup> must have transparent, simple and inexpensive procedures for dealing with postal consumer complaints, which facilitate the fair and prompt settlement of disputes. These complaint procedures must also be made available to consumers. This requirement is detailed in Ofcom's regulatory complaint handling conditions for postal services<sup>5</sup>.

This represents the minimum level of protection for postal consumers.

#### 2.5

More detailed complaint handling protections are placed on Royal Mail as it is the Universal Service Provider<sup>6</sup>. For instance, Royal Mail must:

- Clearly publish its complaint procedure;
- Ensure the complaint procedure is located in a clear and prominent location on its website;
- Clearly set out the relevant contact details in its complaint procedure so a consumer can make a complaint;
- Allow for written and oral complaints;
- Explain its complaint process for investigating complaints and the timescales involved; and
- Make sure the procedure is explained in plain and intelligible language.

#### 2.6

These requirements (Paragraph 2.4 and 2.5) are especially important to help protect those who are sending single piece items of mail with postal operators to other consumers and businesses. This is known as the C2X market<sup>7</sup>.

#### 2.7

Consumers also experience delivery related problems when they receive items of mail which can give them reason to complain. For instance, with parcel delivery services when shopping online<sup>8</sup>. However, when shopping online the contract is between the consumer and the online retailer rather than the postal operator. In these circumstances, a consumer with postal related problems with online orders should complain to the retailer as they have a number of delivery related rights<sup>9</sup>. This is not the focus of this report.

<sup>4</sup> Postal Services Act 2011. Section 27.

<sup>5</sup> Ofcom Consumer Protection Condition 3. Complaints Handling and Redress. 3.2 Obligation on postal operators. March 2017.

<sup>6</sup> Ofcom Consumer Protection Condition 3. Complaint Handling and Redress. 3.3.2 Obligations on the universal service provider.

<sup>7</sup> C2X market – single piece post sent by consumers to other consumers or businesses.

<sup>8</sup> Citizens Advice. Parcel delivery – Delivery services in the online shopping market. June 2017.

<sup>9</sup> The Consumer Rights Act 2015.

## 3. Introduction

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### 3.1

The Consumer Council, along with Citizens Advice and Citizens Advice Scotland, reviewed complaint handling in the UK postal market in 2014<sup>10</sup>. While this review focused on regulated postal operators, it recommended that Ofcom should carry out more periodic reviews. It also suggested Ofcom should look at the framework in the wider postal market to ensure the minimum complaint handling standards<sup>11</sup> were meeting consumer needs. This was particularly important with increasing competition in the parcel market.

### 3.2

Subsequently, Ofcom carried out a review in 2015<sup>12</sup>. It concluded there were no major issues in the wider postal market which required increasing the level of the minimum consumer

protection for all postal operators so complaints were handled appropriately.

### 3.3

However, Ofcom did revisit complaint handling as part of the review into the regulation of Royal Mail in 2016 -17<sup>13</sup>. It decided that there was insufficient evidence to show the need for further regulation of complaints handling processes in the non-universal service postal market. The review concluded that the minimum complaint handling requirement was sufficient.

### 3.4

In response to the review of complaint handling regulation, The Consumer Council highlighted to Ofcom that additional protection beyond the minimum standards may be required in future with the growing importance of the

parcel part of the postal market to consumers. We stated Ofcom should monitor this area.

### 3.5

The Consumer Council committed to working in partnership with Citizens Advice and Citizens Advice Scotland in 2018-19 to consider whether the existing postal consumer complaint requirements are sufficient in the UK postal market. This report represents part of the partnership approach to reviewing complaint handling in the postal market by the consumer advocacy bodies for postal services and the first in a series of reports.

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<sup>10</sup> Delivering satisfaction: Complaint handling in the postal market. October 2014.

<sup>11</sup> Ofcom Consumer Protection Condition 3. Complaints Handling and Redress. 3.2 Obligation on postal operators. March 2017.

<sup>12</sup> Ofcom review of complaint handling and redress in the postal market. August 2015.

<sup>13</sup> Ofcom review of Royal Mail Regulation. March 2017.

## 4. Purpose

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### 4.1

This report updates The Consumer Council's understanding on the UK postal complaints landscape with a focus on the C2X market and makes a number of recommendations.

## 5. Methodology

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### 5.1

In-house desk research took place from June to October 2018.

### 5.2

The study included a review of:

- UK consumer reviews on Trustpilot<sup>14</sup> to see how they rate the service received from postal operators. We selected a number of postal operators which Ofcom monitors through its residential postal tracker research<sup>15</sup>. We also looked at Trustpilot reviews for some parcel brokers<sup>16</sup>;
- How easy it was to find complaint procedures on postal operator and parcel broker websites, and if they were transparent and simple for consumers to make complaints;

- Citizens Advice's Twitter analysis to establish the number of consumer complaint tweets about postal operators between September 2017 and August 2018;
- Ofcom's residential postal tracker research to compare the UK and Northern Ireland consumer experience of problems with postal operators and if consumers went on to complain<sup>17</sup>; and
- The Consumer Council's vulnerable postal consumer research to establish if there are any key differences within Northern Ireland<sup>18</sup> for those that had reason to complain about a postal problem. We looked at older consumers<sup>19</sup>, those on a low income<sup>20</sup> and those with a disability.

<sup>14</sup> Trustpilot.com is a Danish website founded in 2007. It operates across Europe and North America. Its main function is to publish reviews for online businesses.

<sup>15</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018.

<sup>16</sup> A parcel broker is an intermediary between customers and courier service providers. A parcel broker has a higher parcel volume so it can get cheaper prices from postal operators.

<sup>17</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I.

<sup>18</sup> Millward Brown. 1,000 quantitative interviews with consumers. The research took place between 2 February and 27 March 2017.

<sup>19</sup> Consumers aged 65 and over.

<sup>20</sup> Refers to the social grade DE, i.e. those in households where chief income earner is 'D' (unskilled, manual) or 'E' (state benefits only).

## 6. How consumers rate Postal Operators and Parcel Brokers

### Postal Operators

#### 6.1

To improve our understanding on postal complaints about various postal operators, we looked at consumer reviews on Trustpilot to get an indication about how UK consumers feel about the service they receive<sup>21</sup>. While this information covers the different parts of the postal market including when consumers send and receive items from businesses, it provides a valuable insight to the levels of dissatisfaction.

#### 6.2

We considered the consumer experience of a number of operators reviewed in Ofcom's residential postal tracker research<sup>22</sup>. We selected those operators where Northern Ireland consumers said they had experienced problems in the

last 12 months<sup>23</sup>. We decided those Trustpilot ratings as bad and poor were expressions of dissatisfaction which would give a consumer reason to complain, whether or not they reported the matter to the operator. We focused on the combined score of these two categories (Table 1).

#### 6.3

Overall there are many consumers who have been unhappy with the service provided by postal operators and have reason to complain.

#### 6.4

The top three postal operators we looked at which received the highest combined 'poor' and 'bad' rating are Operator 1 (93%), Operator 2 (87%) and Operator 3 (68%). However, there is significant scope for most operators to improve.

**Table 1. % of consumers who rated postal operators as excellent and great, average, poor and bad<sup>24</sup>.**

Operator	Total number of reviews	Excellent and Great (%)	Average (%)	Poor and Bad (%)
Operator 1	308	5	1	93
Operator 2	208	10	2	87
Operator 3	7,222	26	5	68
Operator 4	22,064	38	2	60
Operator 5	33,178	48	4	48
Operator 6	80,083	67	2	30
Operator 7	44,950	72	4	24
Operator 8	15,056	72	7	21
Operator 9	35,370	83	5	13
Operator 10	74,808	93	3	6
Operator 11	No information available			

Source: Trustpilot. October 2018.

### Parcel Brokers

#### 6.5

A parcel broker is an intermediary between customers and courier service providers. Through website sales, a parcel broker can accumulate a higher volume of parcels and therefore can negotiate cheaper prices from postal operators based on predicted sales.

#### 6.6

Parcel brokers' presence in the postal market is increasing. This provides consumers with greater choice as it allows them to send items with operators who may not offer products directly to consumers.

<sup>21</sup> Trustpilot Reviews. A review took place in June 2018. An updated review took place in October 2018.

<sup>22</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I.

<sup>23</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Q13. Problems experienced with parcel delivery companies in the last 12 months?

<sup>24</sup> Due to rounding not all figures add up to 100.

## 6.7

It is important to understand how consumers feel about the service they receive. Again, we looked at consumer reviews on Trustpilot<sup>25</sup>.

## 6.8

Trustpilot consumer reviews show (Table 2) how consumers feel about the service provided by a number of different parcel brokers. Parcel brokers perform better compared to postal operators. However, consumers still experience problems. The top three brokers we looked at which received the highest combined 'poor' and 'bad' rating are Broker 1 (20%), Broker 2 (17%) and Broker 3 (14%).

**Table 2. % of consumers who rated parcel brokers as excellent and good, average, poor and bad.**

Broker	Total number of reviews	Excellent and Great	Average	Poor and Bad
Broker 1	30,157	77	4	20
Broker 2	16,001	79	4	17
Broker 3	24,411	85	2	14
Broker 4	5,561	87	2	12
Broker 5	1,407	90	4	7

Source: Trustpilot. October 2018.

<sup>25</sup> Trustpilot website review. Review took place in July 2018. An updated review took place in October 2018.

## 7. Complaint Procedures for Postal Operators and Parcel Brokers

### 7.1

With many consumers expressing dissatisfaction and having a reason to complain to postal operators and parcel brokers, it is vital to understand if consumers have access to the right information so it is easy to make and pursue a complaint.

### Easy to Find

#### 7.2

Consumers must be able to easily find company complaint procedures. One way to achieve this is by making the complaint procedure available on a prominent location on the website. For instance, in a help and/or customer support section which is clearly visible on the homepage of the website.

### Transparent

#### 7.3

Complaint procedures must be transparent. Transparent procedures will outline the

complaint process, relevant contact details, timescales involved and the escalation process to ensure consumers have the right to appeal a decision if they are still unhappy.

### Simple

#### 7.4

The complaint process must be simple and easy to understand. Simple procedures will clearly tell consumers using plain language:

- How to complain;
- What will happen next and when to expect a response; and
- What to do if they are still unhappy with the response and how to escalate the matter to the relevant person so they can review the complaint.

#### 7.5

The Consumer Council carried out desk based audits of operator and broker websites (Table 3)<sup>26</sup>.

<sup>26</sup> We did not view contact us with some contact details as an adequate replacement for a visible complaint procedure. Also, we did not feel how to claim was as a replacement for a visible complaint procedure.



We looked at the three areas highlighted above (Paragraph 7.2 – 7.4). This consisted of:

- Establishing if the complaint procedure was **easy to find**;
- Considering if the complaint procedure was **transparent**; and
- Determining if the complaint procedure was **simple**.

**7.6**

Annex 1 outlines the different parts of The Consumer Council’s assessment checklist for each of the three areas.

**7.7**

For each of the three areas we gave the postal operator or parcel broker a red, amber or green rating.

- **Red rating.** This indicates there are major issues which will have a significant negative effect on a consumer’s ability to have access to the information they need to make and pursue a complaint. For example:
  - The complaint procedure was not found; and
  - Significant parts of the complaint procedure were missing which made it unclear

and reduced the consumer’s ability to understand the process.

- **Amber rating.** This shows those areas where improvements are needed to make it easier for consumers to find out how to make and pursue a complaint, and what to expect from the process. For example:
  - The complaint procedure was difficult to find and placing it in a more prominent position on the website would make it easier for consumers; and
  - Some important information about the complaint procedure was unclear and/or not detailed.
- **Green rating.** This indicates there were no or limited material issues. For example:
  - The complaint procedure was easily found within a few clicks and found on a prominent location on the website; and
  - All key features of the complaint procedure were detailed, and consumers were clearly told how to complain, what happens next and what do if they are unhappy with the outcome.

**Table 3. Desk based audits of operator and broker websites with green, amber or red rating for each theme.**

Postal Operator/ Broker	Easy to Find	Transparent	Simple
Operator 1	Green	Red	Red
Operator 2	Red	Red	Red
Operator 3	Green	Green	Green
Operator 4	Red	Red	Red
Operator 5	Amber	Green	Green
Operator 6	Red	Red	Red
Operator 7	Green	Red	Amber
Operator 8	Green	Green	Green
Operator 9	Green	Amber	Amber
Operator 10	Red	Red	Red
Operator 11	Red	Red	Red
Broker			
Broker 1	Red	Red	Red
Broker 2	Red	Red	Red
Broker 3	Red	Red	Red
Broker 4	Amber	Amber	Amber
Broker 5	Red	Red	Red

Source: The Consumer Council. October 2018.

**7.8**

Table 3 shows improvements are needed across all three areas – easy to find, transparent and simple.

**Easy to Find****7.9**

Many postal operators and parcel brokers received a red rating because it was not possible to find information about the complaint procedure. Making sure this information is on the website and that it is easy for consumers to find is a vital first step. Including the complaint procedure in a prominent location on the website, for example the homepage, would resolve this issue.

**Transparent****7.10**

Again, many postal operators and parcel brokers received a red rating because it was not possible to find information about the complaint procedure. For those where the procedure was found, a red rating was provided as critical information was missing meaning a lack of visibility on key features of the process (Annex 1).

**7.11**

This means many postal operators and parcel brokers can improve the transparency of their procedures. This can be achieved by outlining information on all the key features of their complaint procedures including:

- An overview of the complaint process;
- The relevant contact details;
- The timescales involved; and
- The escalation and appeals process.

**Simple****7.12**

Making sure complaint procedures are easy to find and transparent will help consumers feel complaint procedures are simple. Additionally, the procedure must be clearly presented, written using plain language and with easy to follow steps. Postal operators and parcel brokers must make sure consumers feel the complaint process is hassle free.

**7.13**

Table 3 shows many postal operators and parcel brokers can take steps to make sure their procedures are simple. To achieve this they should:

- Clearly tell consumers what happens once they make their complaint. This includes explaining the timescales involved so consumers know how long it takes to deal with complaints and when they will get a response; and
- Make it clear what consumers can do if they are unhappy with the outcome. This includes explaining the escalation process so consumers are informed about how to pursue the matter. This gives consumers confidence about their right to appeal and improves fairness of the process so all the individual circumstances of a complaint are adequately considered.

## 8. Citizens Advice Twitter Analysis

### 8.1

Citizens Advice’s aggregated monthly Twitter analysis shows the number of consumers who have complained or expressed dissatisfaction across the postal market. This peaked around December 2017 when consumers made their highest volume of negative twitter comments (Chart 1). While this information covers the different parts of the postal market including when consumers send and receive items from businesses, it helps to show why postal operators must have an adequate complaint handling framework.

### 8.2

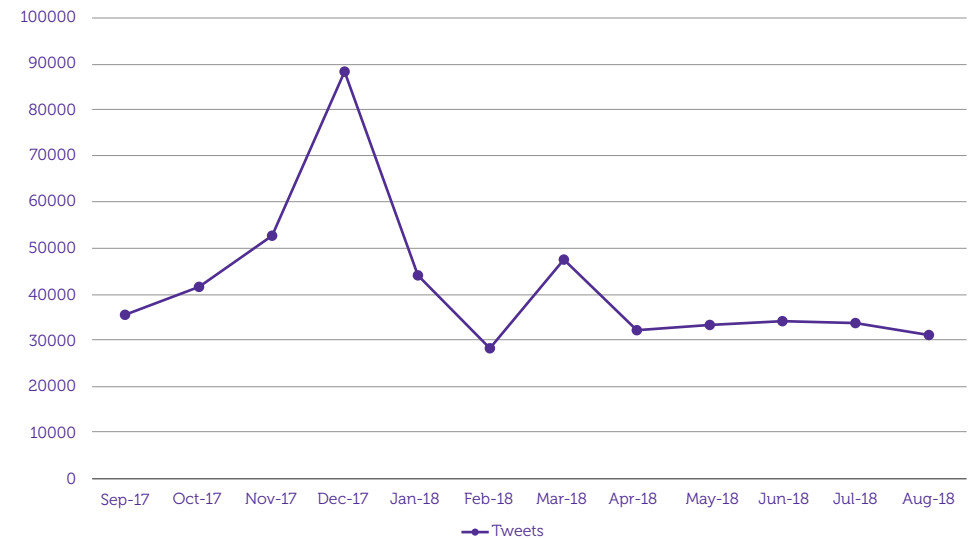
Citizens Advice uses a technology platform called Method52 which was developed by The Centre for the Analysis of Social Media<sup>27</sup>. It allows Citizens Advice to identify and isolate complaint tweets or those where a consumer mentions a specific problem

they are experiencing with approximately 80% accuracy. In its work plan for 2018-19, Citizens Advice highlights the insight this analytical tool can provide about the consumer experience in the postal market<sup>28</sup>.

### 8.3

Although many postal operators work in the business to consumer market largely through online shopping (B2C), Citizens Advice’s social media analysis reinforces the need for operators to have adequate complaint handling procedures which are visible, transparent and simple for consumers to follow.

**Chart 1. Consumer complaint tweets in the Postal Market (September 2017 – August 2018)**



Source: Citizens Advice. September 2018.

<sup>27</sup> Citizens Advice: Protecting consumers in a changing world.

The Citizens Advice consumer work plan 2018/19.

<sup>28</sup> Ibid.

## 9. The UK and NI Consumer Complaint Experience

### 9.1

Ofcom carries out ongoing quantitative residential consumer research into consumers' use of post and attitudes to postal services across the UK<sup>29</sup>. This takes place each quarter. The research looks at consumers' view on affordability, satisfaction with the postal service, the competitive context and the problems consumers are experiencing with postal operators. This research does not look at the consumer experience of parcel brokers.

### 9.2

For the purpose of this report, we look at Ofcom's residential postal tracker research findings on UK and NI consumers' experience with a range of postal operators, if they experienced problems and if they went on to make a complaint<sup>30</sup>. We only selected

those operators where NI consumers said they experienced a problem.

### 9.3

UK and NI consumers experience problems with different postal operators (Table 4). The top four for UK consumers are Operator 5 (14%), Operator 6 (14%), Operator 10 (9%) and Operator 11 (9%). While the findings for NI are only indicative, it shows the top three for NI consumers are Operator 11 (12%), Operator 5 (11%) and Operator 6 (9%).

**Table 4. % of consumers that experienced problems with postal operators<sup>31</sup> (excludes Operator 8<sup>32</sup>)**

Postal Operator	Base size	UK (%)	n = value	Base size	NI (%)	n = value
Operator 1	1370	6	76	26	6	2
Operator 2	1149	5	60	29	7	2
Operator 3	2369	5	127	89	3	3
Operator 4	2170	7	157	62	7	4
Operator 5	2819	14	398	81	11	9
Operator 6	2187	14	307	76	9	7
Operator 7 and 9	2106	6	118	55	4	2
Operator 10	689	9	59	23	4	1
Operator 11	1593	9	137	25	12	3

Source: Ofcom. August 2018.

<sup>29</sup> Ofcom Residential Postal Tracker. Technical Report Q3 2017 – Q2 2018.

<sup>30</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QI3. Problems experienced with parcel delivery companies in the last 12 months [Operator]? Did you make a complaint about the problems you experienced with the services from [Operator]?

<sup>31</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QI3. Problems experienced with parcel delivery companies in the last 12 months [Operator]? NET Yes

<sup>32</sup> Operator 8 did not feature as an option in QI3.

## 9.4

The indicative findings from Ofcom's research suggest many of those UK consumers who experienced postal problems do not go on to complain. For instance, just over half of UK consumers made a complaint to Operator 6 (56%) and Operator 5 (54%). In contrast a significant proportion did not go on to

complain to Operator 6 (39%) and Operator 5 (40%). This means many complaints go unreported to the postal operator.

## 9.5

Due to the small numbers no meaningful analysis was possible for NI consumers so we do not present these in Table 5. Instead, Table 5 focuses on UK findings.

**Table 5. Did you make a complaint about the problems you experienced with the services from [Operator]?<sup>33</sup> (Excludes Operator 8<sup>34</sup>)**

Postal Operator	Base size	YES		NO	
		UK (%)	n = value	UK (%)	n = value
Operator 1	76	46	35	43	32
Operator 2	60	43	25	55	33
Operator 3	127	34	43	60	76
Operator 4	157	47	74	48	76
Operator 5	398	54	214	40	161
Operator 6	307	56	171	39	120
Operator 7 and 9	118	45	53	45	54
Operator 10	59	41	25	48	28
Operator 11	137	61	83	33	45

Source: Ofcom. August 2018.

<sup>33</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QI4. Did you make a complaint about the problems you experienced with the services from [Operator]?

<sup>34</sup> Operator 8 did not feature as an option in QI4.

## 9.6

Ofcom's residential consumer research also provides useful evidence about the proportion of UK consumers that have a complaint with Royal Mail, the number that go on to make a complaint and where they found the information about how to make a complaint<sup>35</sup>. For instance:

- Nearly one in ten UK consumers (9%) had a cause to complain about the service provided by Royal Mail<sup>36</sup>;
- A large proportion of UK consumers (84%) who had a complaint went on to report this to Royal Mail<sup>37</sup>. This is significantly greater than the proportion that go on to complain to other postal operators; and
- The majority of UK consumers (61%) went to Royal Mail's

website to find out about how to complain<sup>38</sup>. This helps to demonstrate the importance of make complaint procedures easy to find on operator websites.

## 9.7

Ofcom's research also offers a useful insight into how UK consumers feel about different aspects of their complaint experience with Royal Mail<sup>39</sup>. These findings indicate lessons for all postal operators which include the importance of making it easy to complain, handling complaints promptly and reaching fair resolutions. For instance:

- **How easy or difficult it was to make a complaint<sup>40</sup>**. Almost two in three (61%) say it is easy to make a complaint. Nearly one in four UK consumers (23%) say it is difficult to make a complaint.

<sup>35</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I.

<sup>36</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH2: In the last 12 months, have you had cause to complain to Royal Mail about its services?

<sup>37</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH3: Did you make a complaint to Royal Mail?

<sup>38</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH4: Where did you find information about how to make a complaint, or did you not need this information?

<sup>39</sup> Ibid.

<sup>40</sup> Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH5: How easy or difficult did you find it to make a complaint about Royal Mail?

- **Satisfaction with the time taken to resolve the complaint<sup>41</sup>.** Nearly two in five (39%) are satisfied with the time taken to resolve their complaint. However, over a third (35%) are unhappy with this aspect.
- **Satisfaction levels with the resolution of the complaint<sup>42</sup>.** Nearly two in five (39%) are satisfied with resolution of the complaint. However, the same proportion (39%) are unhappy with the resolution.
- **Satisfaction levels with complaint handling<sup>43</sup>.** Nearly two in five are satisfied (39%) with the handling of their complaint. However, a significant proportion (38%) are also dissatisfied with the handling of their complaint.

## 9.8

These findings help to show the importance of consumers having a clear understanding of the complaint process so they have accurate expectations. Making complaint procedures easy to find, simple and transparent will help with consumer expectations. This will also help operators meet their regulatory obligations.

## 10. Vulnerable Postal Consumers in Northern Ireland

### 10.1

The Consumer Council's vulnerable postal consumer research findings show the key differences within Northern Ireland for older consumers, low income consumers and those with a disability that have had a postal complaint<sup>44</sup>.

### 10.2

Table 6 shows those consumers with a disability (9%) are most likely to feel they have had reason to complain about a postal problem. This group is also significantly less likely to make a complaint. For instance over half of the general population (52%) complain about the problems they have experienced. In contrast, only a quarter (25%) of those with a disability who have reason to complain go on to

make a complaint to the postal operator. This indicates under reporting of complaints, especially from those with a disability.

### 10.3

The main reason for Northern Ireland consumers not complaining is because they think it is too much hassle (54%). While the findings are indicative, those with a disability (80%) were most likely to say they thought it was too much hassle to make a complaint.

### 10.4

This again helps to show the importance of making complaint procedures easy to find, transparent and simple. These procedures must also be accessible to vulnerable consumers especially those with a disability. For instance:

41 Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH7. Thinking of Royal Mail's response to your complaint, how satisfied were you with ... How your complaint was handled?  
 42 Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH7. Thinking of Royal Mail's response to your complaint, how satisfied were you with ... The resolution to your complaint?  
 43 Ofcom Residential Postal Tracker. July 2017 – June 2018. Section H and I. QH7. Thinking of Royal Mail's response to your complaint, how satisfied were you with ... How your complaint was handled?

44 Millward Brown. 1,000 quantitative interviews with consumers. The research took place between 2 February and 27 March 2017.

#### Questions:

- Thinking about the last 12 months did you experience a problem with <the postal operator > where you thought you had a cause for complaint?
- To whom if anyone did you complain regarding a problem with [operator]? [complaint to Postal Operator]
- Thinking about the most recent occasion when you had cause to complain, why did you not complain?

- The website should cater for consumers with sight and/or hearing impairments or language barriers. Options may include viewing the website in larger fonts in different languages and BrowseAloud; and
- The operator should provide a range of services, like welcoming calls from users of text relay, for consumers who may have difficulty with making complaints.

**Table 6. % of consumers who experienced postal problems and went on to complain to the postal operator. For those consumers that did not complain, the % who said it was too much hassle<sup>45</sup>.**

Group	N value	Reason to complain	Made complaint to Postal Operator	Why they did not complain – Too much hassle
		(%)	(%)	(%)
<b>Consumers overall</b>	748	6	56	54
<b>Older consumers</b>	133	2	50	* <sup>46</sup>
<b>With disabilities</b>	85	9	25	80
<b>Low income</b>	141	6	43	67

Source: The Consumer Council. February – March 2017

<sup>45</sup>

<sup>46</sup> \* Due to the small numbers no meaningful analysis was possible.

## 11. Conclusion and Recommendations

### Conclusion

#### 11.1

Trustpilot shows many UK consumers have had reason to complain about the service they have received. This means all postal operators must have adequate complaint handling procedures in place which are at least consistent with the minimum consumer protection requirement.

#### 11.2

Consumers must feel it is easy to complain, procedures are transparent and are simple to follow. Parcel brokers too must ensure their complaint procedures are clearly visible, transparent and simple to follow. The Consumer Council desk based audits of postal operator and parcel broker websites demonstrate improvements are needed.

#### 11.3

Ofcom's research shows many postal complaints about operators other than Royal Mail go unreported across the UK

which means the operator misses an opportunity to improve the service they offer to consumers.

#### 11.4

Ofcom's research also shows that a greater proportion of consumers with issues about Royal Mail go on to report the complaint compared to other operators. Additionally, the main way consumers find out about how to complain to Royal Mail is by visiting its website. This underlines the importance of providing clear and simple information about complaint procedures on websites.

#### 11.5

Those consumers in Northern Ireland who have had reason to complain, particularly those with a disability, feel making a complaint is too much hassle so did not report their complaint. Operators have a key role to play and must make sure complaint procedures are accessible to vulnerable consumers, especially those with a disability.

## Recommendations

### 11.6

The Consumer Council has proposed the following recommendations:

- **Postal operators and parcel brokers should review their complaint procedures.**

This should look at what improvements can be made so complaint procedures are visible, transparent and easy to use for all consumers. It is also important to make sure complaint procedures and processes are accessible to those with a disability.

- **The Consumer Council will work with Citizens Advice and Citizens Advice Scotland to produce a quick best practice guide.**

We will also look at complaint handling best practice across the other policy areas where The Consumer Council has a specific statutory responsibility<sup>47</sup>. The best practice guide will support a review process and help to show postal operators and parcel brokers how to make

complaint handling procedures easy to find on their websites, transparent and simple for consumers to follow.

- **Ofcom should also provide guidance to postal operators on what they need to do so they comply with the regulatory condition for complaint handling. If improvements are not made within an agreed timescale, Ofcom should consider how best to ensure consumers**

**have access to easy to use and transparent complaint procedures.** This will include bringing the complaint handling protection condition more in line with those followed by Royal Mail, making it clear what operators must do so consumers are adequately protected.

- **The Consumer Council will continue to work with Citizens Advice and Citizens Advice Scotland.** We will further explore ways in which postal complaints processes can be improved so consumers benefit and discuss these with the postal industry.

## 12. Annex 1. Complaint Procedure Checklist

Easy to Find	Location of Complaint Procedure
Homepage	
Help/Support/Customer Service/Advice	
Contact Us	
FAQs/Popular Topics/Guides - information about how to make a complaint	
Search Function. Keyword search: Complaint; I have a complaint; how to make a complaint; and complaint procedure.	
Transparent	Visibility of key features of Complaint Procedure
Contact details provided - Written complaints	
Contact details provided - Oral complaints	
Complaint process explained	
Timescales detailed	
Escalation/Appeal process outlined	
Simple	Easy to understand
Clearly outlines how to complain	
Clearly explains what will happen next/ when to expect a response	
Clearly explains what to do if you are still not happy/ how to escalate the complaint	

<sup>47</sup> The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage.





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