



The Consumer Council for Northern Ireland response to Royal Mail Consultation on the Overseas Post Scheme Changes

The Consumer Council

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.

Consultation Response

2. The Consumer Council is pleased to respond to Royal Mail's proposed changes to its Overseas Scheme which aim to;
 - Reflect alternative identification in lieu of signature where some international postal operators obtain data from identity cards instead of signatures for items sent by International Signed and International Tracked & Signed;
 - Deal with items that resemble restricted or prohibited goods which cause concerns to Royal Mail, border agencies and Royal Mail's postal and logistics partners;
 - Tackle scam mail including fraudulent foreign lottery tickets by better defining scam mail so it is easier to detect and prevent it from reaching vulnerable consumers;
 - Allow Royal Mail greater flexibility to make changes its overseas zonal pricing; and
 - To simplify its wording around the need for mandatory customs data when sending items overseas.

Alternative identification in lieu of signature

3. The Consumer Council understands that Royal Mail wants to make it clear when sending items by International Signed or International Tracked & Signed that some international postal operators may not obtain a signature as proof of delivery but rely on another process.
4. The Consumer Council would ask that this important change is communicated to consumers when they are seeking advice and buying International Signed or International Tracked & Signed For services. This should be made available on Royal Mail's website when consumers use any of its online postage tools and at Post Offices.

5. Additionally, this information should be made easily available on Royal Mail's website and at more generally at Post Offices. The information made available should make it clear which countries do not obtain a signature on delivery so a consumer can make an informed choice about which service to use to send the item to international destinations.
6. Royal Mail and the Post Office have critical roles to play ensuring consumers are aware of this especially as the products are currently marketed as Signed For products which will lead to consumer confusion if a signature is not possible.

Items that resemble restricted or prohibited goods

7. The Consumer Council acknowledges the concerns caused by items which resemble prohibited or restricted goods.
8. The consultation document focuses on the example of ammunition but the list of prohibited or restricted items is significantly longer and those items that might resemble items on this list could be far reaching, if left undefined. It is currently unclear how this variation in policy would be interpreted and implemented across all the list of prohibited or restricted items.
9. The Consumer Council would ask that Royal Mail is clearer and more specific about what items it is targeting. For instance, if the purpose of the proposed change is to target ammunition, explosives and weapons, this should be clearly defined. The Consumer Council would ask that this is clarified in the decision document.
10. The Consumer Council would like to highlight consumer confusion already exists about what items consumers cannot send in the postal system because they are defined as prohibited or restricted. Adding items that resemble items on this existing list is vague and offers no clear guidance for consumers about what they should not send through the postal system. This will add to existing consumer confusion and ultimately any misunderstanding will be at the expense of the consumer. The Consumer Council believes more work is needed in this area more generally to improve consumer understanding.
11. Royal Mail and the Post Office have a vital role to play in making consumers aware of restrictions whether they are prohibited or restricted goods or resemble these goods. Both organisations will need to develop a clear and active approach to making consumers aware of all items that are prohibited or restricted including those that resemble these items. This must be done in a way that is easily understood by consumers to avoid consumer detriment.
12. The Consumer Council would also ask that Royal Mail provides details in its decision document about what it has done with retailers that sell goods internationally to encourage and support them in avoiding harmless items being destroyed by Royal Mail. This is essential to ensure small businesses are informed and to reduce the risk of selling such items online.
13. The Consumer Council also notes that Royal Mail proposes to have more options to deal with items that resemble prohibited or restricted goods. This would include the option to return the

items to the sender or to destroy the items. However, the draft text only discusses destroying or otherwise disposing of the relevant item. This will cause consumer detriment as they will incur the direct and indirect cost of the loss. Consumers will also have no redress as items that resemble those on the prohibited or restricted list will not be covered by Royal Mail's compensation policy. This is a concern.

14. The Consumer Council supports the return to sender approach as the first step rather than the item/s being destroyed and this should be adequately captured in the Scheme. The return to sender approach should be supported by consumer education activity so repeat incidents do not occur.

Scam mail including fraudulent foreign lottery tickets

15. The Consumer Council welcomes Royal Mail's proposal to better define scam mail so it is easier to detect and prevent it from reaching vulnerable consumers.
16. Scam mail causes significant consumer detriment especially to those that are vulnerable. For instance, in a report by the Commissioner for Older People in Northern Ireland estimated a consumer from Northern sent at least £175,000 over a number of years in response to scam mail¹.
17. The Consumer Council looks forward to continuing to work alongside Royal Mail in the Scamwise NI partnership to tackle scams, including scam mail that affects people.

Zonal price change

18. The Consumer Council understands this proposed change will allow Royal Mail greater flexibility to reflect the underlying delivery costs involved to different international countries.
19. The Consumer Council would ask that Royal Mail reviews the price it charges for both letters and parcel products that go to the Republic of Ireland. The Consumer Council's previous research has shown that consumers in Northern Ireland have concerns about the cost of sending items to Republic of Ireland. Indeed, value for money and faster delivery times were the most frequently cited improvements that both consumers and businesses in Northern Ireland would like to see made to cross-border postal services².
20. The Consumer Council's Border Post report recommended that Royal Mail should consider how best it can improve the cross-border postal service offering between the UK and Republic of Ireland, particularly in terms of value for money and speed of delivery. The Consumer Council believes that the rationale outlined in the consultation of the proposed changes to zonal pricing represents an opportunity to review this area with a view to reducing postal prices between the UK and Republic of Ireland.

¹ <https://www.copni.org/media/1117/whos-calling.pdf>

² <https://www.consumercouncil.org.uk/node/1072>

21. The Consumer Council would also for ask for reassurances from Royal Mail that with the changing relationships created by Brexit that Royal Mail will continue to practice uniform pricing across the UK.

Customs Data

22. The Consumer Council understands that Royal Mail is simplifying its wording in the Scheme to highlight the importance of providing accurate customs data when sending items that require custom information especially for those that use Royal Mail's online solutions.

23. While The Consumer Council appreciates the changes in the consultation are targeted at those who buy postage online, Royal Mail must ensure it provides guidance to all consumers across whatever method they choose to send items to international destinations. Many consumers will need to be made aware of custom requirements and educated on how to successfully and accurately complete the required declarations. This means adequate information on Royal Mail's website, knowledgeable staff at Customer Service Points and adequately trained staff across the Post Office Network. This quality information and guidance will help to avoid items being unnecessarily delayed or destroyed.

24. Additionally, the landscape may change rapidly with Brexit and it is vital that up-to-date information is easily available and easy to understand so it is clear what consumers need to do to meet custom requirements and accurately complete custom declaration forms. The Consumer Council would ask Royal Mail for further details on how it plans to communicate with consumers on their obligations under Brexit.

Conclusion

25. In summary, The Consumer Council would ask Royal Mail:

- To make clear to consumers that a signature will not be obtained by all international postal operators when using its International Signed and International Tracked & Signed services. This information should be made easily available on Royal Mail's website and at Post Offices. It should also be made clear which countries do not obtain a signature on delivery before a consumer buys the service to any countries that do not collect a signature.
- To be clear and specific about what items it is targeting when dealing with items that resemble restricted or prohibited goods. For instance, if purpose of the proposed change is to target ammunition, explosives and weapons this should be clearly defined.
- To develop a clear and active approach to make consumers aware of all items that are prohibited or restricted including those that resemble these items. This must be done in a way that is easily understood by consumers to avoid confusion and consumer detriment.

- To provide details in its decision document about what it has done with retailers that sell goods internationally to encourage and support them in avoiding harmless items being destroyed by Royal Mail.
- To include in the Scheme that Royal Mail will include a return to sender approach rather than relying solely on the item/s being destroyed/disposed of that resemble restricted or prohibited goods and to complement this process by educating consumers so repeat incidents do not occur. Solely relying on destroying items is a concern as consumers will incur the direct and indirect cost of the loss with no access to redress as items that resemble those on the prohibited or restricted list will not be covered by Royal Mail's compensation policy.
- To review the price it charges for both letters and parcel products that go to the Republic of Ireland with a view to improve consumers attitudes towards value for money and delivery times. With Royal Mail's need for greater flexibility to reflect the underlying delivery costs involved to different international countries this is the opportune time to review to reduce postal prices between the UK and Republic of Ireland.
- To ensure it provides guidance so consumers are aware of custom requirements and how to accurately complete the required declarations. This best way to do this will be through Royal Mail's website, knowledgeable staff at Customer Service Points and adequately trained staff across the Post Office Network.
- To provide further details on how Royal Mail will plan to communicate with consumers on their obligations under Brexit.

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29 April 2020