



nirwn

**Northern Ireland
Rural Women's Network**

**NIRWN's Response
to
Post Office Ltd
Network Change
Programme**

**Northern Ireland Rural Women's Network (NIRWN)
15 Molesworth Street
Cookstown
Co Tyrone
BT80 8NX
Tel: 028 86769191
Email: nora@nirwn.org.uk**

Index

Introduction Page 3

General comments Page 3

Specific comments Page 4

NIRWN's Recommendations Page 7

Introduction

Northern Ireland Rural Women's Network (NIRWN) is a regional network established to articulate the voices of women in rural areas. It is jointly funded by Department of Agricultural and Rural Development (DARD) and Department for Social Development (DSD) under the EU BSP Programme.

NIRWN has four key objectives:

- developing weak community infrastructure in areas where little or no community based rural women's groups exist,
- increasing rural women's capacity and opportunities to influence decision-making and policy formulation,
- running Northern Ireland wide communication campaigns with a local focus, highlighting the value of rural women's contribution,
- offering a training and capacity building programme to rural women across the region.

Northern Ireland Rural Women's Network (NIRWN) welcomes the opportunity to respond to the Network Change Programme, set out by Post Office Ltd.

General Comments

Some 4 million fewer people are using their Post Office each week than two years ago. The network lost £2 million every single week last year, rising to £4 million this year. Research has also indicated that, on average, fewer than 16 people a week used the 800 smallest rural Post Offices, at a cost of £17 per visit to the taxpayer. NIRWN recognises that this is not sustainable. A long term strategy is required to ensure that services provided through our rural Post Offices are economically and socially effective.

The general feedback we have received from working with women's groups in rural communities is that rural Post Offices are a lifeline, providing far more than just a postal service. Many rural women, especially pensioners use their Post Office as a 'one-stop shop' to access their pension and benefits, pay their bills, get advice and information, and meet and socialise with others. We are concerned that closures and proposed outreach services could leave many people increasingly financially and socially excluded.

Feedback received from rural Post Office Sub-postmasters was of a general lack of communication regarding the Network Change Programme. Sub-postmasters that were not affected by the Network Change Programme, were not kept informed on proposals for closure and outreach services to other Post Offices. Considering the Post Office is part of a network, this limited communication is not satisfactory. Sub-postmasters that were not affected by the changes were not kept in the loop. They learnt of the proposals through the internet when the Network Change Programme was published for consultation on the 1 April. Need to know basis

Specific Comments

Consultation Period

From the outset we would like to state that the consultation period of 6 weeks is an insufficient timeframe to consult with the wide range of stakeholders on the proposals outlined. The 6 week consultation period contravenes international and national guidelines on effective consultation. The Code of Practice issued by the Cabinet Office in 2004 states that there should be a minimum of 12 weeks consultation in order for it to be meaningful.

For replacement outreach services to meet consumers' needs and avoid exacerbating exclusion and disadvantage they must be adequate in terms of their access, availability, affordability and appropriateness. This will vary by community, and therefore local public consultation should be undertaken when deciding on which outreach arrangements will be implemented. We would therefore recommend that the consultation period is extended by at least another 6 weeks to ensure the process is meaningful and not tokenistic.

The “social role” and the “economic role” of the Post Office

Post Office Ltd acknowledges that Post Office has an ‘economic’ and ‘social’ role to play but fails to define what this means. As a result the social and economic role that the Post Office does play for consumers and their communities is not sufficiently considered. The implication is that they are not recognised in any practical or meaningful sense. Post Office closures and the introduction of outreach services will hit the more socially excluded members of society most, older people, people who are unemployed or on low incomes and disabled people. Not only are these the people who tend to use Post Office services the most but it is these groups that find it the most difficult to travel further afield to access the services that a closed Post Office formerly provided. Post Offices play particularly important social and economic roles in helping to keep the shops in rural deprived areas open. Post Offices are frequently the only local place to take out cash, provide support for the vulnerable local residents and act as a focal point for communities.

- Although nearly everyone uses a Post Office from time to time, Post Offices' most frequent customers are older and poorer people. UK wide figures show that around 40% of weekly Post Office customers are over 55 years old and over 60% of weekly customers are from social classes C2DE. (*Reeves 2004*)
- 99% of older people in rural areas consider their local Post Office to be a 'lifeline'. (*Age concern 2006*)

The economic interdependence of businesses in many communities means that the changes to the range of Post Office services can have a direct impact on the viability of another. The result can be that consumers are left without local access to multiple services. Clarification is therefore sought on what constitutes the ‘social’ and ‘economic’ roles that Post Offices play in our communities. This needs to be clearly stated in the Network Change proposals.

National Minimum Criteria

The rationale for decisions on closures and delivery of outreach services is based on a set of minimum Government criteria. The criteria:

- Nationally, 99% within 3 miles and 90% of the population to be within 1 mile;
- In deprived urban areas, 99% of the population to be within 1 mile;
- In urban areas, 95% of the population to be within 1 mile;
- In rural areas, 95% of the total rural population within 3 miles.
- In remote areas, 95% of the population to be within 6 miles of their nearest post office outlet.

The criteria fails to include the rural deprived perspective. The relevance of mobility in relation to access is not considered. The access criteria are too simplistic as set out in the consultation, failing to be consumer-centred. Additions to the criteria are necessary to ensure that rural deprived is integral to proposals made. The criteria for restructuring the Post Office Network must include access to public transport, which currently is as much of a barrier as distance, particularly for older people living in rural environments. This is particularly poignant for rural women, given their longer life expectancy. Additions to the access criteria to establish mobility should include:

- age
- number of young children
- walking distance
- car ownership
- availability and cost of local public transport.

Local environmental factors

Local environmental factors are key determinants in consumers' experience of access. These include: crime, transport and provision of other essential services. These are locally sensitive and may mean the difference between being able to access a service or not. Costs and fears associated with transport and crime are real barriers to services and should be recognised and factored into decisions around closures and outreach services. Elderly people and those with children are particularly affected by these barriers. Crime levels and fear of crime for particular groups should be considered when deciding on outreach services.

Equality Impact Assessments

NIRWN advocates the need for Equality Impact Assessments to be carried out on proposals. Given the large customer base of Post Offices we would also request that proposals are gender proofed also. The customer base of Post Office users is diverse: women and girls comprise 51% of the population and men and boys 49%, and within this division are segments covering minority ethnic groups, those with disabilities, age, religion and sexuality.

In order to ensure the most suitable service is provided in a local community, understanding the user is a necessary part of deciding on what are the most appropriate services for that area. Incorporating a gender perspective into the Network Change Programme means not thinking about users as a homogeneous

group but as distinct groups with differing needs, characteristics and behaviours who might need different approaches if equality of opportunity is to be achieved for all.

Research has indicated that the most frequent customers are older people. UK wide figures show that around 40% of weekly Post Office customers are over 55 years old. Given the longer life expectancy of women we feel that Equality Impact Assessments with a particular emphasis on gender mainstreaming services needs to be incorporated to ensure that outreach services are tailored to suit the differing needs of our local communities.

Post Office Card Account (POCA)

The Post Office is ideally placed to deliver the replacement for the current Post Office Card Account (POCA) which expires in 2010. It is important that existing POCA holders are all given the opportunity to obtain the replacement product and that they can operate it at the Post Office. It is not desirable for consumers to be forcibly transferred from a POCA to a bank account, even where they already have one. Consumers should continue to have an active choice over how they receive their income.

The Future of the Network beyond 2011

The government has committed to make “substantial further funding” available until 2011. Post Offices face a long-term challenge. From online services, e-mail, phone and Internet banking, direct debit and text messaging, people are increasingly choosing to live their lives in different ways. The Post Office network needs a long-term and sustainable forward strategy. However there is no indication of planned support or review post 2011. Post Office Limited should undertake research as part of their long-term strategy, with Post Office users to establish which additional services they would use at the Post Office. Developing and tailoring existing services so that they meet customers’ needs.

Sub-postmasters should play a key role in researching the long-term viability of the Post Office, seeking their wealth of experience and tapping into local knowledge and needs on the type of services that they would be willing and able to deliver in order to make their business more sustainable. Services delivered through the Post Office have to meet the needs of their core customer group if they are to play a part in maintaining the network. Consultation with local communities and Sub-postmasters needs to be an on-going process.

The document fails to examine or discuss the negative impact that the 42 compensated closures may have on social and financial inclusion progress. There is no information on compensation packages.

Viability for Sub-postmasters

In order to obtain a thriving modern Post Office Network, it is essential that Post Offices are able to provide a viable living for Sub-postmasters. In order to keep our society’s rural Post Office services, the people who run them need to be confident that they will be able to make a decent income. Additional training and development in business skills is required to put the network on a long-term sustainable footing. This is a key area where subsidy can make a long-term difference, which is

particularly important for Sub-postmasters who are helping to deploy outreach services.

Public subsidy

The Network Change Programme fails to clarify how the government subsidy will be broken down. Again the lack of meaningful consultation with key users and stakeholders neglects the opportunity to discuss what would be the best use of those funds in order to achieve a sustainable network. Clarity is required on how Post Office Ltd plans to spend the government subsidy. The government has committed to make “substantial further funding” available until 2011, with an expectation that a continuing subsidy will be needed after this. We are very concerned that the 42 closures announced will be a minimum, rather than a maximum figure and that decisions will be based purely on the distance to the nearest alternative Post Office. The future of the Post Offices delivering outreach services post 2011 is equally uncertain.

A Cohesive Government Approach

The government must develop a positive, coherent and sustainable rural strategy, and provide a lasting solution for the Post Office Network informed by those who use and depend on it. The introduction of a Rural White Paper and Rural Champion by DARD and the Government’s commitment to anti-poverty through Lifetime Opportunities, contradicts with the proposals in the Network Change Programme. Current plans for the network do not take factors such as the availability of public transport and the impact on social inclusion into account, or go into any detail about how local communities affected will be consulted. The Government needs to develop genuine joined-up policy to ensure the best outcome for consumers and their communities is reached. Part of this is being open and transparent around what the Post Office’s role and contribution is, or should be, in achieving these policy objectives.

UK Government departments, the devolved administration and local councils should consider ways in which they can, and should, support the Post Office Network while also ensuring easy access to essential goods and services for consumers.

There are a number of challenges to our national Post Office Network. Trends in retailing have resulted in people buying a greater proportion of their shopping at larger supermarkets. This has put pressure on Post Offices’ ancillary businesses. In addition there has been a general lack of investment in the Post Office Network.

NIRWN’S Recommendations

- The criteria for restructuring the Post Office Network must include access to public transport, which can be as much of a barrier as distance. Local environmental factors need to be taken into consideration when decisions are being made.

Additions to the access criteria to establish mobility should include:

- age
- number of young children
- walking distance
- car ownership

- availability and cost of local public transport.
- Against the background of more complex access criteria suggested, it is vital that local communities have a sufficient length of time to respond. The six week local consultation period is too short.
- NIRWN advocates the need for Equality Impact Assessments to be carried out on proposals with a particular emphasis on gender mainstreaming.
- UK Government departments, the devolved administration and local councils should consider ways in which they can, and should, support the Post Office Network while also ensuring easy access to essential goods and services for consumers.
 - For example the government must put pressure on banks to ensure all bank accounts are accessible through Post Offices.
 - The loss of major Government and service provider contracts, including the television licence fee. This damages the Post Office's turnover, but is also less convenient and sometimes more expensive for consumers.
 - The public have frequent contact with their local council through payments such as rent, council tax, parking fines etc. As responsibility for key services are to be delivered through a community planning framework. The role of the local council and the sustainability of Post Offices need to be integral.
 - The Post Office Card Account (POCA) must be replaced by a better product and must remain Post Office based.
 - The government must develop a positive, coherent and sustainable rural strategy, and provide a lasting solution for the Post Office Network informed by those who use and depend on it.
- If a Post Office must be relocated within another business to avoid closure, the same level of expertise and skills of staff must continue to be provided and the services must be in an accessible position.
- The Network Change Programme fails to clarify how the government subsidy will be broken down. Again the lack of meaningful consultation with key users and stakeholders neglects the opportunity to discuss what would be the best use of those funds in order to achieve a sustainable network. Clarity is required on how Post Office Ltd plans to spend the government subsidy.
- In order to obtain a thriving modern Post Office Network, it is essential that Post Offices are able to provide a viable living for Sub-postmasters. Investment into training, learning and development in business skills is essential.
- What happens post 2011? The Post Office Network needs a long-term and sustainable forward strategy. However there is no indication of planned support or review post 2011. Post Office Limited should undertake research as part of their long-term strategy, with Post Office users to establish which additional services they would use at the Post Office.