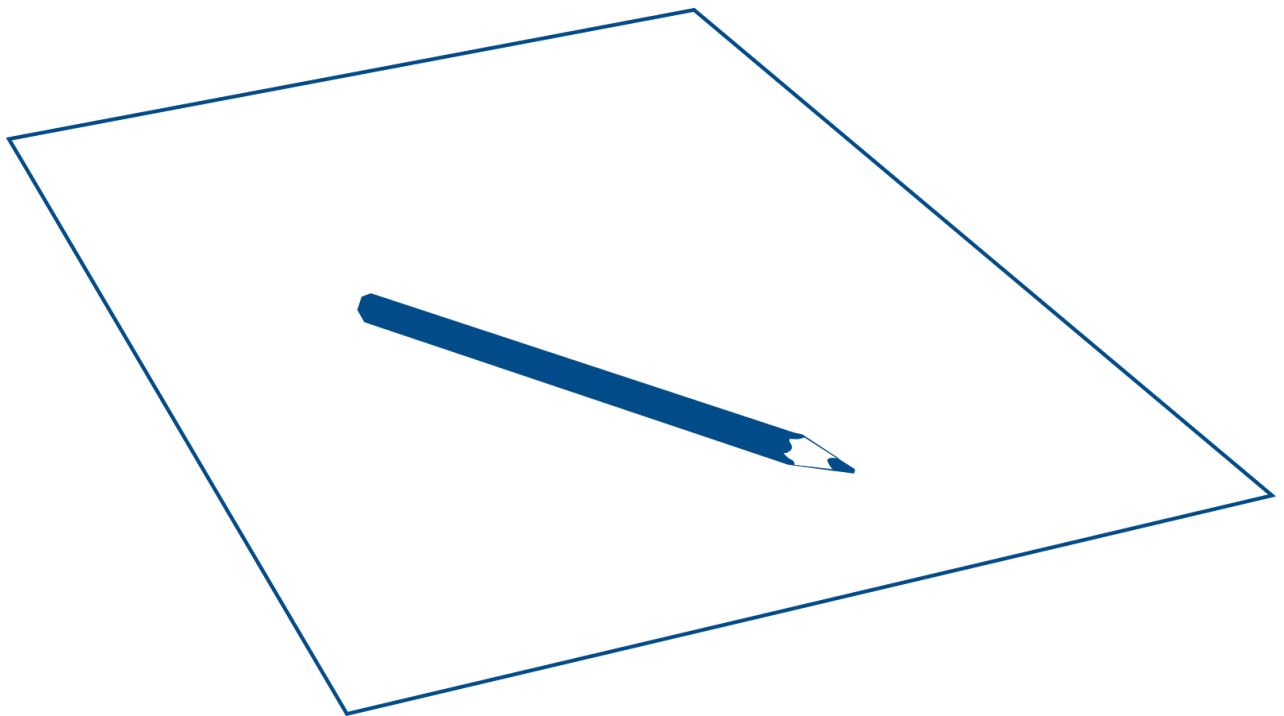


# Communicating change

How well post offices are  
informing customers  
about branch changes



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# Summary

The post office network provides access to mail and other services in 11,600 branches across Great Britain. It is currently undergoing its biggest ever period of restructuring through the Network Transformation Programme (NTP). This is designed to place the network on a more sustainable financial footing by converting around three quarters of branches to new operating models by 2018.

The programme offers significant benefits to consumers, such as longer opening hours, but can also present risks of consumer detriment as branches are adapted or relocated. Effective communication and, where appropriate, consultation are important. The latter accommodates specific customer needs in each location, which is important both for consumers but also for post offices to ensure that transitions are effective and support their future sustainability.

When making changes to the network, POL follows a Code of Practice ('the Code') which sets out how it will communicate and consult with consumers. As a minimum, individual branches are required to communicate changes through the display of certain materials, such as posters and letters, which vary depending on the type of change.

This research looks specifically at how well proposals are being communicated in branch, using the Code and POL guidelines as a benchmark. It is the second consecutive wave of mystery shopping of NTP change communication, and does not feature any Crown Post Offices.

We found that a third (32%) of branches met all requirements, exactly the same as in our first wave of research. But a similar proportion (32%) failed on at least 1 major display requirement, including 1 in 5 branches which failed against all measures of a major failure. We define a major issue as posters not being suitably visible, no letters being available to take away or no materials being available at all. These are set out fully in annex B.

Our research compares branches going through different types of transformation. We found that branches going through the biggest changes (a 'Consultation' phase) have improved performance slightly, with almost half (47%) fully complying. This compares favourably to the overall average from our sample (32%) and against the 'Consultation' performance in our first wave (39%).

However, branches undergoing a 'Customer Engagement' period as part of a conversion to a PO Local in the same premises performed considerably worse. They were more likely to fail on all counts (24%) than to be fully compliant (18%). Branches in the notification phase - which is used to communicate final decisions - are just as likely (24%) to fail on all counts, but are more likely to be fully compliant (36%).

The better performance of branches undergoing the most significant changes whereby a branch is relocating, off site transitions, shows that POL can learn from good practice. But even amongst the consultation group, just under half (47%) are fully compliant. The general consistency of findings across our 2 research projects suggests that POL needs to reconsider how it supports compliance with the Code. This should be a priority. The NTP has entered its final 18 months and we anticipate that the remaining post office changes could represent the hardest transitions as the majority relocate to new retail premises.

We welcome POL's use of other channels beyond in-branch notifications. These include POL directly contacting local stakeholders, issuing local press releases and the introduction of a portal on its website to support electronic feedback. We focus on in-branch communication as this is the most direct process for the consumers who will be most affected by changes, particularly those with limited internet use.

## Recommendations

Without a more rigorous and proactive approach - beyond the current arrangements of calling branches and reactive ad hoc visits - we are concerned that many more consumers may be missing out on important information on changes affecting their access to essential services.

We recommend:

1. **POL needs to improve operator compliance with the Code and POL guidelines.** For example its monitoring arrangements could be improved by conducting a rolling wave of unannounced spot checks at branches converting to new models during the NTP in between and on top of the current monitoring arrangements.
2. **POL should share and review the data from the spot checks** and calls to branches not fully meeting the display requirements with Citizens Advice within the existing NTP liaison arrangements between both organisations.
3. **All display requirements should be captured in a single document, the Code of Practice.** This will make it easier for individual post offices to comply and for POL and others to monitor performance.

# Background

## Citizens Advice

The Citizens Advice service is the statutory watchdog for post offices and postal consumers in Great Britain. In accordance with Section 16 of the Consumer, Estate Agents and Redress Act, we investigate matters relating to the number and location of public post offices. We promote the consumer interest with regard to the number, location and quality of post offices, and aim to promote a sustainable, accessible service that is capable of responding to changing consumer needs.

We have particular regard for the needs of vulnerable consumers, and consumers living in rural areas. Consumers with vulnerabilities may include elderly citizens and those with one or more disabilities. Through our policy and scrutiny functions, we promote the interests of consumers and small businesses in decisions on both the future of the post office network and access to the essential social and economic services that the branch network provides.

## Network transformation programme

The post office network is currently undergoing its biggest ever restructuring programme. The aim of the Network Transformation Programme (NTP) is to maintain the size of the network and place it on a more financially sustainable footing by converting traditional sub-post offices to new operating models, PO Locals and PO Mains. It is envisaged that that by the end of the NTP, in March 2018, around three quarters of the 11,600 branch network will have converted to one of the new models. Citizens Advice anticipates that there will be approximately 5,500 PO Local and up to 3,000 PO Main conversions.

Citizens Advice is supportive of the NTP as an effort to ensure the post office network is placed on a more stable financial footing, maintaining its current size and resulting in benefits for consumers such as increased opening hours. However, the NTP represents a more complicated set of changes to communicate to the public than any previous managed change programme, changing the provision of, and how consumers access essential services across the network.

The NTP involves smaller town and village sub-post offices converting to PO Locals. The PO Local model represents a fundamental shift in how post office services are provided. Unlike the traditional sub post office model a more restricted range of services are offered from a main retail counter often by general retail staff for longer opening hours.

Larger town and city centre branches will convert to PO Mains. During core opening hours (9am to 5.30pm) PO Mains offer a full range of post office services at dedicated counters by dedicated staff. Dependent on the operator,

some PO Mains provide a more restricted range of services during extended opening hours from a main retail counter.

In many cases branches will be relocated and converted to PO Local or PO Main in a variety of new retail premises such as convenience stores, petrol stations and cafes. In other cases there will be changes to the layout and environment of a branch in the existing retail premises of a post office.

## Types of conversion activity

There are 3 main types of conversion activity in the NTP; consultation, customer engagement and notification.

- **Consultations:** a 6 week consultation period is undertaken when POL plans to relocate and convert a branch to a PO Local or Main in a new retail premise. During this time POL asks for consumer feedback on how the proposed change will impact on their ability to get to, into and access services inside the new branch and any impacts on the local community.
- **Customer engagement:** branches converting to a PO Local in the same premises have an initial 4 week feedback period. POL asks for consumer views on the proposed changes to the internal layout and environment of the branch, the range of post office services and opening hours. 1-2 months after the branch has converted there is a further 2 week period in which POL asks for consumer feedback on their experience of the changes and to suggest any improvements.
- **Notification:** follows consultation or engagement phases, or before a branch converts to a PO Main on the same premises. POL provides advanced notification of the decision to convert the branch to one of the new models. This usually involves outlining the reasons for and how it has reached a decision to convert the branch, the exact date for conversion and any temporary closure period. The length of the notification period will depend on the type of change, as detailed in Appendix A.

## What branches are required to do

When making changes to the network, Post Office Ltd (POL) follows a Code of Practice ('the Code') which sets out how it will communicate and consult with consumers. The Code is operated between POL, Citizens Advice, Citizens Advice Scotland (CAS) and the General Consumer Council for Northern Ireland (GCCNI). When the NTP began, POL and Citizens Advice's predecessor body, Consumer Futures agreed the materials that branches undergoing changes in the programme should display.

The display requirements placed on branches are mainly captured in two key documents - the Code (agreed between POL and Citizens Advice) and guidelines provided by POL to operators. POL's guidelines help to inform operators how

materials should be displayed and made available. There are 3 main types of materials:

- **Poster:** the most prominent format in branch for providing key information on a proposed post office change at a high level. The poster outlines what is happening, the dates of any consultation or customer engagement activity, the likely conversion date, key aspects of the new service and how consumers can participate in the changes.
- **Letter:** contains further detailed information on the reasons for a proposed change, key aspects of the current and new branch, the feedback POL is seeking, how to participate and any consultation, customer engagement or notification timescales. The Letter also contains information on the complaints process if consumers do not think POL has adhered to the timescales in the Code.
- **The Code of Practice booklet:** sets out how POL will communicate and consult with consumers, the timescales for different types of changes to the network and the complaints process.

Branches are required to display different materials dependent on the type of change and conversion activity. More information on what materials branches are required to display across the types of conversion activity can be found in Appendix A.

# Research method

Citizens Advice commissioned GfK, an experienced research agency, to undertake a programme of mystery shopping visits to post offices across Great Britain that are undergoing changes as part of the NTP. The objectives of the research were to assess:

- whether branches were displaying the correct materials at the correct times and meeting their requirements either fully, partially or not at all
- if there was a major or minor impediment to consumers' awareness and understanding of the changes
- if any progress had been made in overcoming the challenges identified in our previous wave of research

GfK mystery shoppers made 402 visits to post offices undergoing changes in the NTP. This included 92 visits to branches undergoing consultation, 145 visits to branches undergoing a customer engagement exercise and 165 visits to branches during a notification period before a change took place. Information on the different types of conversion activity can be found in Appendix A.

The fieldwork was completed between December 2015 and February 2016. Mystery shoppers were instructed to act as normal customers but to look for how posters, letters and Code documents were displayed and if they were available to take away. If letters and Code documents were not displayed, they were told to request a copy at the counter. Shoppers were provided with detailed briefing notes on the materials to look for at each conversion stage. These were based on information in the Code and POL's guidelines, and included what constituted full, partial or non-compliance, as well as distinctions between major and minor breaches. More information on what constituted a branch meeting the display requirements fully, partially or not at all and if there was a major or minor breach is provided in Appendix B.

Shoppers also assessed the visibility of, and access to, materials for people who use a wheelchair or are visually impaired, and staff information on changes. Although the mystery shoppers used for the research were not disabled, their insights provided a useful indication of the display and availability of materials for disabled consumers.

This is the second wave of mystery shopping research that we have undertaken to assess if branches converting to new models are meeting the display requirements in the Code and POL guidelines. The first wave was completed between December 2014 and February 2015 in which mystery shoppers undertook 340 visits to branches undergoing changes in the NTP. These two waves give Citizens Advice a robust evidence base to consider what the findings potentially mean for consumers' awareness and whether POL's monitoring arrangements are sufficient.



# 1. Overall branch compliance

Our research shows that almost a third (32%) of branches were fully compliant with their communication requirements. These branches are giving their customers the best chance to understand and provide feedback on changes. But 1 in 5 branches failed to meet all requirements, and a further 48% failed on at least one, mostly minor, measure as explained in the next chapter.

As table 1 shows, performance varies across different conversion stages. Branches undergoing a consultation on a proposal to relocate and convert a branch to a PO Local or PO Main generally performed better. For example, they are considerably more likely than those in engagement phases to fully comply (47% compared with 18%). And consultation branches are considerably less likely to fail on all measures (5%) compared to engagement and notification (both 24%).

**Table 1. Branches fully, partially or not meeting requirements at all (brackets show percentage point change from previous year's research)**

	Overall	Consultation	Customer Engagement	Notification
Fully meeting requirements	32% (-1)	47% (+8)	18% (-5)	36% (+4)
Partially meeting requirements	48% (-4)	48% (-7)	58% (-5)	39% (-7)
Not meeting requirements at all <sup>1</sup>	20% (+4)	5% (-1)	24% (+10)	24% (+3)

Customer engagement occurs when branches are converting to a PO Local on the same site. They performed less well, both in relation to consultation and notification phases and to their performance in the first wave. The proportion failing to meet any requirements has risen significantly (from 14% to 24%). These branches are now *more likely* to fail on all requirements than to meet all requirements.

The performance of branches in the notification phase, when the final decision is communicated, has also failed to improve overall. They have slightly improved at meeting all requirements (from 32% to 36%, although this change lies within the margin of error) and are twice as likely as engagement branches to do so. But they are just as likely (24%) as engagement branches to fail on all measures.

<sup>1</sup> Depending on the stage, this can be because of a number of reasons, such as a letter is not visible or available, a poster has not been displayed at all or has not been made suitably visible. See Annex B for full details.

## 2. Issues impeding consumer awareness

When branches did not fully meet the display requirements, mystery shoppers documented whether this was due to major or minor issues.

A major issue equated to a significant impediment to consumers' awareness of the changes and the opportunity to provide feedback. These occurred when:

- posters were not suitably visible or not displayed at all
- no letters were available to take away
- no materials were available at all

Posters and letters contain the most important information on individual branch changes. These materials detail the reasons for the change, key aspects of the current and proposed new branch, the feedback POL is seeking, how to participate and the consultation timescales. Posters and letters also contain the likely date of the change, any temporary closure period and the complaints process if consumers do not think POL has adhered to the Code timescales. The information in the poster and letter is essential for consumers to be fully aware of, understand and participate in a post office change in their local area.

A minor issue equated to a lesser impediment to consumers' awareness and understanding of the changes. In the majority of visits this meant that the Code booklet was not available on request. Branches are meant to have a copy of The Code booklet, which sets out how POL will communicate and consult with consumers, the timescales for different types of changes to the network and the complaints process. We count this as a minor issue because, although this information is important to consumers' understanding of what to expect from different types of post office changes, the Code booklet does not provide information on an individual branch change.

### Major impediments

In a third (32%) of visits there was at least one major issue. This includes 20% of all branches which are failing against all potential measures of a major breach (i.e. they were not correctly displaying or making available any of the expected materials).

As illustrated in table 2 below, once again we found a mixed picture. The total proportion of branches with major issues was down slightly (36% to 32%), but the proportion failing on all measures increased slightly.

Branches undergoing consultation performed fairly consistently across both waves, with 22% having a major issue. In contrast, we saw a significant increase in the proportion of customer engagement branches with major problems, rising from 27% to 44%, including 24% which failed on all counts.

The findings highlight a particular issue with the display and availability of communication materials during a customer engagement period. This is important because of the purpose of the engagement period. It is designed to allow consumers to give feedback on how they will be affected (or have been affected) by the conversion of their branch to a PO Local.<sup>2</sup> This in turn allows POL to adapt their proposals to better suit customers and, ultimately, protect the long term viability of the branch.

**Table 2. Major and minor impediments**

	Overall	Consultation	Customer Engagement	Notification
No issues	32% (-1)	47% (+8)	18% (-5)	36% (+4)
Minor issues - partial compliance	36% (+4)	30% (-10)	38% (-12)	36% (+16)
Major issues - partial compliance	12% (-8)	17% (+3)	20% (+7)	3% (-23)
Major issues - not meeting requirements at all	20% (+4)	5% (-1)	24% (+10)	24% (+3)

During the notification period, we found a significant fall in the proportion of branches with a major issue compared to the first wave, dropping from 47% to 27%. This is a positive change, caused by a decline in the proportion with a major but partial problem with compliance. In fact, the proportion failing against all major measures increased slightly, to 24% (up from 21%) in 2014/15.

The notification period is important because certain changes may result in a post office relocating to a new retail premises, a temporary closure period before conversion to one of the new models or changes to the range of post office services. Where no materials are suitably displayed, there is a risk that consumers will be unaware of the decision to convert or even relocate their post office, possibly until the changes had been implemented.

<sup>2</sup> This includes consumers' thoughts on and experiences of accessing post office services at the main retail counter and some of the international parcel and manual banking services at alternative branches which do not form part of the PO Local model.

## Minor impediments

In over one third (36%) of visits we identified a minor impediment to consumers awareness and understanding of the changes. This was fairly consistent across the three different phases, as shown in table 2.

Minor issues were most commonly identified during the customer engagement period (38% of visits), although this represents an improvement on last year (50%). However, as highlighted above, this improvement is offset by the significant increase in major impediments to consumers' awareness and understanding uncovered this year.

Branches undergoing consultation periods had fewer minor issues, down from 40% to 30%. It appears that most of this improvement has resulted in a larger proportion of consultation visits which fully met the display requirements in comparison to last year. This is welcome, but consumers would benefit from further improvements, particularly given that consultations take place on the most important changes.

We identified minor issues in over a third (36%) of visits to branches undergoing a notification period before the implementation of a change. This represents a significant increase on last year in which only one in five (20%) visits found a minor issue. This was largely a shift from partial compliance with major issues to partial compliance with minor ones, which is welcome. Although in the majority of notification visits a minor issue equated to the Code booklet not being available, in some visits it was categorised as the poster, one of most important materials, not being suitably visible.

### 3. Staff information on changes

Staff information is not required by the the Code or POL guidelines, but can provide customers with additional information. It can play a personal role to bridge any gap in consumer awareness, understanding and participation in the changes. Mystery shoppers recorded the information provided by staff on post office changes.

We found that staff mentioned changes spontaneously to customers in 1 in 5 cases. When prompted, almost 9 in 10 (89%) staff provided information about changes to mystery shoppers. As table 3 shows, changes were mentioned unprompted in 1 in 5 (21%) cases.

Mystery shoppers approached the post office serving position, conducted a postal transaction and waited to hear if staff mentioned the changes spontaneously. Branch refurbishment was most commonly cited overall (13%), particularly during the customer engagement period (18%).

**Table 3: Spontaneous mention of changes**

	Overall	Consultation	Customer Engagement	Notification
Branch refurbishment	13% (+3)	5% (-1)	18% (-1)	12% (+2)
General changes to the branch	12% (-3)	15% (-3)	17% (+1)	7% (-5)
Transformation programme	5% (-1)	12% (+6)	3% (-8)	2% (-3)
Consultation/customer engagement process	7% (-2)	8% (-2)	7% (-1)	N/A
Staff mentioned at least 1 aspect of change above	21% (-)	22% (-1)	26% (-4)	17% (-1)

Shoppers then prompted staff for information on the changes, saying they had seen or heard about changes to the branch. In the majority (89%) of cases, staff provided additional information when requested. As shown in table 4, they mentioned what the changes would mean for customers in just over a quarter (26%) of visits and in a similar proportion of visits staff mentioned the general changes to the branch but not what it would mean for customers. In just over one in ten (11%) visits, staff knew nothing about the changes.

Across the conversion stages, staff in branches undergoing a customer engagement were more likely to inform shoppers what the changes would mean for customers. But they were also more likely to know nothing about the changes (15%, up from 5% in the first wave).

**Table 4. Information on changes following prompt**

	Overall	Consultation	Customer Engagement	Notification
What changes would mean for customer	26% (-5)	25% (-3)	31% (-3)	22% (-9)
General changes to the branch	23% (+5)	26% (+7)	19% (+2)	24% (+6)
Knew nothing about the changes	11% (+4)	5% (+1)	15% (+10)	11% (+1)
Pointed to the poster <sup>3</sup>	10% (+3)	7% (+1)	3% (+3)	19% (+9)
Pointed to letter information <sup>4</sup>	8% (-6)	12% (~)	6% (-13)	4% (+4)
Consultation / engagement process	7% (-2)	10% (-2)	5% (+2)	N/A
Told to look on the Post Office website	3% (~)	2% (~)	3% (~)	4% (+1)
Told to call head office/helpline	1% (~)	0% (-1)	1% (+1)	2% (+1)
Other <sup>5</sup>	16% (-3)	13% (-2)	17% (-2)	16% (-6)

### Staff provision of materials

Mystery shoppers also documented whether counter staff provided a copy of the letter or Code booklet spontaneously or after prompting, asking if there was any information they could view or take away. This is particularly important when materials are not suitably displayed or readily available to take away.

Letters were suitably displayed in 56% of visits where they were required. In a further 15% of visits, shoppers who had not already seen a copy of the letter in the branch were offered a copy at the counter spontaneously or after prompting. In the remaining 29% of visits, shoppers were not able to take a

<sup>3</sup> Overall results and notification results do not include the notification of decision following Stage 1 Customer Engagement.

<sup>4</sup> Overall results and notification results do not include notification of decision to relocate and convert branch to a PO Local or Main and notification to convert branch to PO Main in same premises as existing branch.

<sup>5</sup> Shoppers referred to materials unrelated to the branch change or provided with a range of other feedback in which staff mentioned the post office would be moving or which materials contained the appropriate information.

letter. In the majority of these visits this was because counter staff knew nothing about the letter or had no letters left. In a small number of visits counter staff mentioned that the letters had not arrived.

The Code booklet was available to see in only 28% of visits. This includes when it was on display as well as provided by counter staff spontaneously, on request or following a query about the branch changes. The Code booklet was not visible or available in 72% of visits. In most of these cases counter staff had no copy of the booklet, could not locate or knew nothing about it or the changes. In a small number of visits counter staff informed shoppers that the relevant information on the Code was contained in the letter.

During the provision of materials on the branch changes shoppers also recorded if they were provided with any further verbal or written information on the changes, selecting multiple responses where appropriate. As illustrated in table 5, in nearly a third of visits (32%, down from 41% last year), staff informed shoppers about the positive aspects of the changes such as longer opening hours. This was most common during the engagement phase (44%). In 1 in 5 visits, a slight reduction on last year, shoppers were informed that the branch change was part of bigger changes to the Post Office network.

**Table 5. Additional staff information on changes**

	Overall	Consultation	Customer Engagement	Notification
Positive aspects for customers (e.g. longer opening hours)	32% (-9)	27% (-18)	44% (-6)	25% (-10)
Part of bigger changes to Post Office network	20% (-4)	23% (+3)	25% (-8)	13% (-6)
Mentioned consultation or customer engagement	15% (-8)	25% (-2)	8% (-8)	N/A
Negative aspects for staff (e.g. job losses)	8% (+3)	15% (+7)	6% (~)	5% (+2)
Negative aspects for customers (e.g. no dedicated postmaster)	6% (+2)	7% (+1)	8% (+3)	4% (+2)
Negative aspects for the community	3% (~)	5% (+1)	2% (-1)	2% (~)
Other <sup>6</sup>	27% (+4)	30% (+5)	23% (+6)	28% (+4)

<sup>6</sup> Staff mentioned different aspects of the changes such as the physical alterations to the branch, impacts on the services or wider rationale for the changes.

Once again there was a relatively low level of information provided to shoppers about a consultation (25%) or customer engagement process (8%) during these stages. This represents an improvement for consultations and customer engagements compared to the initial provision of this information, but a worse performance for both stages compared to the first wave.

## **Staff encouraging feedback**

Shoppers visiting branches during a consultation or customer engagement period then recorded if staff mentioned how to provide feedback on the changes, spontaneously or after prompting. This information was only recorded in visits in which materials were correctly displayed or available.

Staff only encouraged shoppers to provide feedback in a small proportion of visits. Staff encouraged feedback spontaneously or after prompting in only 27% of visits to branches during a consultation or customer engagement period. Shoppers recorded multiple channels through which staff suggested to provide feedback. In 49% of visits in which staff encouraged feedback, down from 69% last year, staff suggested that shoppers provide feedback through the e-portal or online.

In just under half (46%) of visits counter staff suggested email and 31% suggested submitting feedback at the branch or by freepost each respectively, although this represented a drop from 43% last year for the latter method. In a small number of visits counter staff mentioned signing a petition, writing to an elected representative or did not know or suggest any method to submit feedback.

Even in visits in which materials were correctly displayed or available to take away staff provided little information on how to respond to, and participate in the changes, either spontaneously or after prompting. The consultation and customer engagement periods communicate the most important post office changes in the NTP. These changes often involve the physical relocation of branches, changes to the services and products and the internal layout and environment.

However, the low level of encouragement from staff to provide feedback could potentially result in many consumers being unaware of how to participate in and provide feedback on the changes. Without consumer participation it is likely that POL may be unaware of local concerns with a planned post office change and unable to adapt proposals accordingly to mitigate concerns and secure community buy-in.



## 4. Accessibility of materials for disabled people

Approximately 17 million people visit the post office each week and it is estimated that up to a quarter of post office customers are disabled or are close to someone who is disabled.<sup>7</sup> So it is crucial that consultation documents are presented clearly for disabled customers.

The NTP involves the biggest ever investment and refurbishment of post offices, whilst maintaining the size of the network. Much of this investment involves improving physical accessibility inside the new post office models. POL has made a commitment that there will be no reduction in physical access into new branches, maintaining level access across the threshold if similar arrangements are present at the outgoing branch.

As a minimum the PO Local and PO Main models come with a host of facilities to make it easier for disabled customers to use these branches. These facilities include portable PIN pads, hearing loops, low level serving positions, scales and writing desks. In order to comply with the Equality Act, operators of the new models are required to make reasonable adjustments to provide sufficient aisle widths and turning circles so that disabled customers can access post office serving positions.

Citizens Advice is supportive of the investment through the NTP to improve physical accessibility at post offices. As part of our role in the NTP our delivery advisors meet with POL on a weekly basis to review branch changes. This role focuses on consumers' ability to get to, into and inside a new branch to access services and products. To date we have worked with POL as part of the consultation process to agree changes to 50-60% of proposals to improve branch accessibility.

However, the nature and scale of the changes may have a disproportionate impact on disabled consumers. In many cases branches will be physically relocated and converted to a PO Local or Main in a variety of new retail premises. The physical relocation of branches represents a particular challenge for disabled consumers. These consumers may have to learn a new route to their local branch which may be difficult if they are dependent on family, friends or public transport to get to their post office.

In other cases there will be changes to the range of post office services and the internal layout and environment. These changes will impact on how disabled customers physically access the post office counter in a different and unfamiliar layout and environment, how they interact with retail customers and staff and their access to services that no longer form part of the model. For many disabled people a change in their routine to access post office services may represent a daunting experience.

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<sup>7</sup> Post Office Limited, 'Accessibility and the Post Office Network'.

Given the potential impact of the changes on disabled consumers' access to essential services across the network, it is important that they are aware of, understand and can participate in the changes. Disabled consumers' participation is particularly important to ensure that POL can adapt proposed branch changes to meet their needs. Maintaining access for a large segment of POL's customer base will be important to the future use and sustainability of the network.

As part of our research mystery shoppers were asked to assess if a disabled customer who is a wheelchair user or partially sighted would have been able to easily see the poster and pick up a copy of the letter. Although the mystery shoppers used for the research were not disabled, their insights are a useful indication of the display and availability of materials for disabled consumers.

Overall, in 90% of visits in which a poster was displayed shoppers reported that a disabled customer who is a wheelchair user or partially sighted were able to easily see the poster. This left one in ten visits (10%) in which a wheelchair user or partially sighted customer may not have been able to see a copy of the poster. The main reason for this was the high positioning of the poster.

As illustrated in table 6, it is encouraging that branches undergoing a consultation, involving the most important and major changes in the NTP, performed well. However, it is concerning that there was a deterioration in the performance of branches undergoing a customer engagement period from last year, representing a 6 percentage point increase in visits in which the poster was not easily visible. Branches undergoing a customer engagement often involve changes to the internal layout, environment and range of services as the branch converts to a PO Local in the existing premises. Consequently it is important that disabled customers using a wheelchair or who may be partially sighted are aware of and understand the changes.

**Table 6. Visibility of poster for wheelchair user or partially sighted customers**

	Overall	Consultation	Customer Engagement	Notification
Poster easily visible	90% (-3)	95% (+2)	90% (-6)	89% (-2)

In a higher proportion of visits where letters were displayed, in over 1 in 5 (22%) visits they were not easily visible for wheelchair users or visually impaired customers. This is broadly in line with the same measure last year. Once again the main reason for this was the high positioning of the letter. As illustrated in table 7 the lack of an easily visible letter for wheelchair users or partially sighted customers varied across the conversion stages.

**Table 7. Visibility and accessibility of letter for wheelchair user or visually impaired customers**

	Overall	Consultation	Customer Engagement	Notification
Letter easily visible	78% (+1)	81% (+3)	76% (-4)	76% <sup>8</sup> (+2)
Letter easily available to pick up	77% (-)	81% (+6)	75% (-7)	71% <sup>9</sup> (-3)

Across the conversion stages the results reflect a slight improvement in the performance of consultation and notification stages from last year. However there was a slight deterioration in the performance of customer engagement stages on last year in which the letter was not easily visible for wheelchair users or visually impaired customers in 20% of visits.

Similar results and reasons to last year were also reported by mystery shoppers in relation to wheelchair users or visually impaired customers unable to easily pick up a copy of the letter, in 23% of visits. As illustrated in table 7 the inability of these customers to easily pick up a copy of the letter varied across the conversion stages. Once again this represents an improvement across consultation visits on last year, down from 25% to 19% this year. However there is a deterioration in the performance of branches undergoing a customer engagement visit on last year, up from 18% to 25% this year.

In the majority of visits across both waves of our research it appears that where branches displayed posters, wheelchair users or visually impaired customers were able to see a copy. However consistently in a substantial minority of visits where letters were displayed, wheelchair users or visually impaired customers were unable to easily see or pick up a copy. This is a particular concern in consultation and customer engagement visits, despite a slight improvement in visits to the former stage compared to last year.

Across consultations, customer engagements and notifications the letter provides essential information to help consumer awareness and understanding of and participation in post office changes. These changes are likely to disproportionately affect disabled consumers and often involve the physical relocation of a branch, changes to the internal layout and environment of an existing branch or to the range of services and products. Our research findings suggest that in a substantial minority of visits some disabled consumers may not have sufficient access to this important information in their branch. This may impact their ability to fully understand and participate in the changes, and may hinder POL's ability to adapt proposals to meet the needs of such a large and important proportion of the customer base.

<sup>8</sup> Low base size for notification visits.

<sup>9</sup> Low base size for notification visits.

# Conclusion

Our findings suggest that there is a low level of compliance with the display requirements as set out in the Code and POL guidelines. Almost a third (32%) of branches had major issues with the display and availability of the most important materials. The research also uncovered potential issues with the display and availability of these materials for disabled consumers. We will publish more detailed research on the specific experience of disabled consumers in post offices next year.

Clear and transparent communication of post office changes is important to ensure that the NTP is a success for consumers and the future of the post office network. Improving compliance with the Code and guidelines will provide POL with better feedback to adapt proposals accordingly where concerns are raised and to secure buy-in from local communities, crucial to the future use and sustainability of new branches. So we welcome the slight improvement in branches undergoing consultation phases, and encourage POL to learn from this.

The NTP is at a crucial juncture. It is moving into its final 16 months and we anticipate that the remaining post office changes could represent the hardest for POL as more branches need to be relocated. There is a considerable prize for getting communication right, and a considerable risk of consumer detriment if it is not fixed.

As our research has uncovered similar findings across 2 waves without any improvement it also suggests that POL's monitoring arrangements are not sufficient. Without a more rigorous and proactive approach, beyond the current arrangements of calling branches and reactive ad hoc visits, we are concerned that many more consumers may be missing out on important information on changes affecting their access to essential services.

We recommend that:

- 1. POL needs to improve operator compliance with the Code and POL guidelines.** For example its monitoring arrangements could be improved by conducting a rolling wave of unannounced spot checks at branches converting to new models during the NTP. This will help to resolve the problems uncovered by our research and could be integrated in between and on top of the current monitoring arrangements. Initially the spot checks could be conducted using existing resources within POL through their field change advisors, who are responsible for managing changes on the ground on an area basis across the UK. Visits could be intelligently focused and targeted on branches where incentives for operators to display materials are likely to be the weakest.

2. **POL should share the data from the spot checks and calls to branches not fully meeting the display requirements with Citizens Advice.** This data could be collated, shared and reviewed with Citizens Advice within the existing NTP liaison arrangements between both organisations.
  
3. **All display requirements should be captured in one document, the Code of Practice.** Currently the display requirements placed on operators are mainly captured across two key documents, the Code (agreed between POL and Citizens Advice) and display guidelines (issued to operators by POL). This makes it hard for consumers and operators, as well as POL and Citizens Advice, to access a clear summary of display requirements. Combining the requirements into a single document, a holistic Code of Practice, would help operators comply more easily, which would in turn deliver significant benefits to consumers. A single document would also make it easier for POL and Citizens Advice to monitor compliance.

## Appendix A - Conversion timescales

Conversion stage	What's happening	Timescales	Materials on display and available on request
<b>Consultation</b>	Proposal to relocate and convert a branch to a PO Local or PO Main	6 weeks	Poster, letter and Code of Practice booklet
<b>Customer engagement</b>	Stage 1 - feedback on proposal to convert branch to PO Local in existing premises	4 weeks	Poster, letter and Code of Practice booklet
	Stage 2 - feedback on how new branch is operating following conversion to a PO Local in existing premises	2 weeks	Letter
<b>Notification</b>	Notification of relocation and conversion of a branch to a PO Local or PO Main	4 weeks	Poster
	Notification of conversion of branch to PO Local in existing premises following stage 1 customer engagement	2 weeks	Poster and letter
	Notification of conversion of branch to PO Main in existing premises	4 weeks	Poster and Code of Practice booklet

# Appendix B - Types of compliance and issue

All issues are in the Code except those in italics and underlines, which are from POL's guidelines

Stage	What's happening	Fully compliant	Partially compliant	Non compliant	Major issue	Minor issue
<b>Consultation</b>	Proposal to relocate and convert a branch to a PO Local or PO Main	Poster on display that is suitably visible, letter to take away and Code of Practice booklet available on request	One or two items out of full compliance	None of the items from the full compliant list	No poster that is suitably visible or <u>letter to take away</u>	Just the Code of Practice booklet unavailable on request
<b>Customer engagement</b>	Stage 1 - feedback on proposal to convert branch to PO Local in existing premises	Poster on display that is suitably visible, letter to take away and Code of Practice booklet available on request	One or two items out of full compliance	None of the items from the full compliant list	No poster that is suitably visible or letter to take away	<u>Just the Code of Practice booklet unavailable on request</u>
	Stage 2 - feedback on how new branch is operating following conversion to a PO Local in existing premises	Letter on display that is suitably visible and available to take away	Letter on display that is suitably visible but not available to take away	No letters on display that are suitably visible or available to take away	No letters at all are suitably or available to take away	Letters available to take away but not suitably visible
<b>Notification</b>	Notification of relocation and conversion of a branch to a PO Local or Main	Poster on display that is suitably visible	Poster on display which is not suitably visible	No posters on display at all	No posters on display at all	Poster on display which is not suitably visible
	Notification of branch conversion to PO Local in existing premises following stage 1 customer engagement	Poster on display that is suitably visible and letter available to take away	One or two items out of full compliance	None of the items from the full compliant list	<u>No posters on display at all</u> or no letters available to take away	Poster on display which is not suitably visible but letter still available to take away
	Notification of conversion of branch to PO Main in existing premises	Poster on display that is suitably visible and Code of Practice booklet available on request	One or two items out of full compliance	None of the items from the full compliant list	No posters on display at all	<u>Just the Code of Practice booklet unavailable on request</u>

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We advocate for our clients and consumers on the issues that matter to them.

We value diversity, champion equality and challenge discrimination.

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