



# **Ofcom's proposed Plan of Work 2025/26**

**Response by the Consumer Council for Northern Ireland  
29 January 2025**

# Table of contents

## Consultation response form

<b>1. Overview of our response .....</b>	<b>3</b>
<b>2. About the Consumer Council.....</b>	<b>5</b>
2.1 Our role in super-complaints .....	6
<b>3. Our approach.....</b>	<b>8</b>
3.1 Consumer protection principles .....	8
3.2 Northern Ireland consumer position.....	9
<b>4. Our response to individual questions .....</b>	<b>12</b>
4.1 Individual questions .....	12
<b>5. Contact information .....</b>	<b>23</b>

# 1. Overview of our response

The Consumer Council welcomes the opportunity to comment on Ofcom's proposed Plan of Work 2025/26. The Consumer Council is supportive of Ofcom's Plan of Work for 2025/26, and our response is focused on the priorities of Internet and Post we can rely on, and We live a safer life online.

We are however concerned about the wider affordability experiences of NI consumers for both communication and postal services and don't believe there is enough focus on affordability in Ofcom's Plan of Work. We have used our consumer research to speak to this point throughout this consultation.

Recent research by the Consumer Council indicates that consumers in Northern Ireland are increasingly vulnerable to scams and telecoms debt, while many lack awareness of their rights, the ability to navigate digital markets, the knowledge necessary to transfer telecom providers, and a reliance on postal services by vulnerable consumers.

Understanding regional difference is essential and we have used this consultation to highlight key Northern Ireland considerations for the year ahead including:

- Telecoms is an essential service for Northern Ireland consumers particularly in the areas of broadband and mobile.
- The achievement of fairness for consumers necessitates different approaches to protections across UK regions. This is of particular relevance in Northern Ireland where the small size of our market, geographical separation from the UK market, an EU land border, different regulatory regimes, and implementation of the Windsor Framework create a unique environment for businesses, and different challenges for consumer access, opportunities, and protections.
- Due consideration should be given to unfair behaviour and practices beyond EU Exit, whether in relation to market access or any divergence of regulations and standards.
- Postal services are essential to Northern Ireland consumers and SMEs, especially those in vulnerable situations.
- Any change to the USO to ensure financial sustainability and efficiency within the postal services must have robust consumer safeguards against detrimental impact of consumer needs.
- Ensuring access to affordable and uniform postal services is vital for our consumers and any potential changes to the universal postal service must ensure that the focus is not solely on cost saving but also on continuing to meet evolving consumer needs.
- Postal monitoring of quality of service targets are an important part of the regulatory framework and help ensure consumers receive the level of service for the price they have paid.
- Implementation of the Windsor Framework will affect parcel deliver data requirements when sending parcels from GB to NI. It is essential that this does not adversely affect NI consumer access and choice when receiving parcels from GB. Ofcom should ensure the parcel USO consumer protections are not eroded for NI consumers.

We continue to work closely with Ofcom through our statutory remit in post representing Northern Ireland consumer interests. Delays in reforming consumer advocacy in telecoms however has led to a consumer protection gap at a time when Northern Ireland consumers are experiencing increasing detriment.

In the year ahead we would urge that progress is made on legislating for consumer advocacy in telecoms to enhance consumer protections in this important sector. The Consumer Council as the designated consumer advocacy body in Northern Ireland for the telecoms sector, will continue to work in partnership with Ofcom in this area.

Throughout 2024 the Consumer Council conducted research in areas that relate to this consultation including:

- Broadband Affordability and Accessibility research – June 2024<sup>1</sup>
- Northern Ireland Household Expenditure Tracker Q2 2024 – November 2024<sup>2</sup>
- Consumers views and behaviours in response to the rising cost of basics (Rising Cost of Basics) - March 2024<sup>3</sup>
- Pulse survey – August/September 2024<sup>4</sup>
- Qualitative study on the Impact on Consumers of Changes to Royal Mail's Universal Service - November 2024<sup>5</sup>
- Consumer expenditure, consumer problems, and scams - yet to be published<sup>6</sup>

We have used this latest research and previous consumer insights as an evidence base for our response.

---

<sup>1</sup> [Broadband affordability and accessibility in Northern Ireland - June 2024](#), July 2024, Consumer Council

<sup>2</sup> [Northern Ireland Household Expenditure Tracker Q2 2024](#), November 2024, Consumer Council

<sup>3</sup> [Consumers views and behaviours in response to the rising cost of basics](#), April 2024, Consumer Council

<sup>4</sup> [Northern Ireland Consumers & the cost of living - Pulse Survey August/September 2024](#), October 2024, Consumer Council

<sup>5</sup> [Qualitative study on the impact on consumers of changes to Royal Mail's Universal Service Obligation](#), November 2024, Consumer Council

<sup>6</sup> 'Consumer expenditure, consumer problems, and scams' - yet to be published, Consumer Council

## 2. About the Consumer Council

The Consumer Council is the statutory consumer representative body for Northern Ireland, responsible for protecting, empowering consumers and representing consumers, promoting their interests.

We operate under our sponsor department, the Department for the Economy (DfE), on behalf of the Northern Ireland Executive.

We are an insight-led evidence-based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Protecting consumers by investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice, welfare and protection.
- Our statutory powers cover consumer affairs, energy, transport, water and sewerage, postal services and food affordability and accessibility.

These legal responsibilities are drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding. The work we carry out also aligns with a number of the Articles in the Protocol on Ireland and Northern Ireland<sup>7</sup> (NI Protocol).

Our non-statutory functions educate, empower and support consumers against discriminatory practices in any market through advocacy work, as well as education and outreach programmes covering a broad range of topics including promoting consumer rights, financial inclusion and a more sustainable energy future.

We serve Northern Ireland's 1.9 million citizens and champion consumers in everything we do. We prioritise those who are disabled or chronically sick, who are of pensionable age, who are on low incomes and who live in rural areas.

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. Our aim is to ensure government policies recognise consumer needs in rural areas and promote equality of opportunity and good relations across a range of equality categories.

---

<sup>7</sup> [Protocol on Ireland and Northern Ireland](#), House of Commons Library

## 2.1 Our role in super-complaints

We are also a designated super-complaints body set up under the Enterprise Act 2002<sup>8</sup> and the Financial Services and Markets Act 2000 Order 2013<sup>9</sup>.

Under both Acts, if the Consumer Council believes any feature or combination of features of a market in the United Kingdom (UK) is, or appears to be, significantly harming the interests of consumers, we can raise a super-complaint on behalf of consumers to the following regulators:

- Civil Aviation Authority (CCA)
- Competition and Markets Authority (CMA)
- Financial Conduct Authority (FCA)
- Office of Communications (Ofcom)
- Office of Gas and Electricity Markets (Ofgem)
- Office of Rail and Road (ORR)
- Payment Systems Regulator (PSR)
- Northern Ireland Utility Regulator (Utility Regulator)
- Water Services Regulation Authority (Ofwat)

Under the Gas and Electricity Licence Modification and Appeals Regulations (Northern Ireland) 2015<sup>10</sup>, we can appeal to the CMA if we believe a modification by the Utility Regulator to the licence of a gas or electricity provider is detrimental to the interests of consumers.

## Our role in consumer affairs

Our principal statutory duty is to safeguard the interests of consumers in Northern Ireland by empowering them and providing a strong representative voice to policy makers, regulators and service providers. We do this by:

- Carrying out, or assist in carrying out, inquiries.
- Considering and investigating complaints under statutory functions, and where appropriate, any complaint relating to consumer affairs.
- Promoting and disseminating any information related to consumer affairs in order to educate and empower consumers.
- Undertaking independent research and monitoring consumer experiences.
- Reporting to any Northern Ireland Executive Department on any matter relating to consumer affairs.

---

<sup>8</sup> [Enterprise Act 2002](#), UK Parliament

## Our role in EU Exit

Alongside our statutory obligations under The Order, the Consumer Council has certain functions in relation to EU Exit.

The Order gives us the powers to monitor and report on the real and perceived impacts for consumers in light of Northern Ireland's unique position of being in the UK customs territory with access to the EU single market for goods, and the considerations of the NI Protocol, and now the Windsor Framework.

This allows us to educate and empower consumers to understand how any changes might affect them and what actions they need to take. The work carried out by the Consumer Council is aligned to the following Articles of the NI Protocol:

- Article 4: Customs territory of the UK
- Article 5: Customs, movement of goods
- Article 6: Protection of the UK internal market
- Article 9: Single electricity market
- Article 11: Other areas of North-South cooperation

## Our role in postal services

Alongside our statutory obligations under The Order, the Consumer Council has certain functions in relation to postal services.

Department for Business and Trade (DBT) is our partner Department, who fund our consumer advocacy work in Northern Ireland for postal services.

The Public Bodies (Abolition of the National Consumer Council and Transfer of the Office of Fair Trading's Functions in relation to Estate Agents etc) Order 2014 transferred National Consumer Council functions for consumer matters in relation to post in Northern Ireland to the Consumer Council.

This transferred to the Consumer Council certain functions of the National Consumer Council under the Postal Services Act 2000<sup>11</sup>, and the Postal Services Act 2011<sup>12</sup>.

The Consumer Council therefore took on the functions of the National Consumer Council (which was abolished) relating to consumer matters in Northern Ireland for postal services.

Our work in postal services focuses on carrying out research, influencing policy, providing advice and information, and investigating complaints made by consumers in vulnerable circumstances, and gives us information gathering and investigation powers to help fulfil this statutory function.

---

<sup>11</sup> [Postal Services Act 2000](#), UK Parliament

<sup>12</sup> [Postal Services Act 2011](#), UK Parliament

## 3. Our approach

In this section, we have set out our approach to the Proposed Plan of Work 2025/26 from Ofcom.

### 3.1 Consumer protection principles

The Consumer Council uses eight guiding principles to assess where the consumer interest lies, and develop and communicate our policies, interventions and support.

They provide an agreed framework through which we approach regulatory and policy work and ensure we apply a consistent approach across statutory and non-statutory functions, and in our engagement with consumers and stakeholders.

**Figure 1: Consumer protection principles**



They serve to protect consumers, setting out minimum standards expected from markets when delivering products or services in Northern Ireland.

They frame our policy position and approach to addressing emerging detriment and resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable consumer groups.

## 3.2 Northern Ireland consumer position

Before setting out our response, we feel it is important to highlight some key considerations about the consumer position in Northern Ireland.

Northern Ireland has unique considerations with a more vulnerable population, a regional market, geographical separation from the remainder of the UK market, a land border with the Republic of Ireland (ROI) and European Union (EU), and a legislative environment impacted by regulatory divergence.

Consumer detriment levels in Northern Ireland can be significant but given our relatively small population in comparison to the UK, the detriment our consumers face can sometimes struggle to be prioritised, reported and monitored on, at a national level.

### We are more rural

Northern Ireland represents just 3% of the total UK population<sup>13</sup> but we have more than double the proportion of citizens living in rural areas (36%)<sup>14</sup> compared to England (17.1%)<sup>15</sup> and Scotland (17%)<sup>16</sup>.

This is particularly relevant as our population growth in rural areas from 2001-2020 has outstripped urban areas by a factor of almost three to one (20% to 7%)<sup>17</sup>. Rurality can heighten vulnerability in some markets and supply chains.

### We are more vulnerable

Every day, we support consumers with expert, confidential advice and services.

Between April 2021 and March 2024, we have supported over 70,000 consumers through to our consumer helpline and free and independent complaint investigations, and outreach and education programmes across Northern Ireland. Our casework shows heightened vulnerability with more complex and multi-faceted needs.

This work is underpinned by our extensive portfolio of consumer monitoring and research into their lived experiences, expectations and perspectives. We therefore have unique insights into the socio-economic trends influencing consumer behaviour and confidence, and the challenges and opportunities they face.

We also take quarterly temperature checks of the cost of living impacts on consumers in Northern Ireland. Our latest Pulse Survey from August/September 2024<sup>18</sup> found:

- 43% felt that their household was worse off when compared to 12 months ago and only about a third (32%) believed their household would be better off in 12 months' time.

---

<sup>13</sup> [Population for the UK, England, Wales, Scotland, and Northern Ireland: Mid-2023](#), October 2024, Office of National Statistics

<sup>14</sup> [NI: IN PROFILE Key statistics on Northern Ireland](#), November 2022, Northern Ireland Statistics and Research Agency

<sup>15</sup> [Rural population and migration](#), October 2021, Department for Environment, Food and Rural Affairs

<sup>16</sup> [Rural Scotland Key Facts 2021](#), February 2021, Scottish Government

<sup>17</sup> [Key Rural Issues: Northern Ireland](#), 2023, Department of Agriculture, Environment and Rural Affairs

<sup>18</sup> [Consumer Pulse Survey](#), August/September 2024, Consumer Council

- Almost three quarters (74%) agreed they could keep up with bills and buying essentials, but 18% said they have £50 or less each month, with 36% stating they have £150 or less left over each month, after mortgage/rent and all essential bills had been paid.
- 43% agreed dealing with financial matters was a burden and nearly two in five (38%) agreed their mental health was negatively affected by their financial situation.
- Three in five (62%) stated they have had to cut back on spending on essentials after their mortgage/rent and any loan or overdraft payments have been made.

## We are less well off

The Consumer Council has monitored household income and expenditure since 2021. The latest Northern Ireland Household Expenditure Tracker<sup>19</sup> found half of our households had less than £100 per week after paying taxes and essential spending.

Between April and June 2024, our lowest earning households:

- Had a total household income per week before tax of just over £283, which is 6% lower than the UK average.
- Had just under £50 per week after paying taxes and paying for essentials, which is 22% lower than the peak of Q1 2021, of just over £64.
- Spent half (50%) of their total basic spending on food and non-alcoholic beverages, housing, water, electricity, gas and other fuels, and transport.
- Are more reliant on social securities, with 70% of income coming from benefits compared to 61% for lowest earning households in the UK.

## We have lower financial resilience

Northern Ireland has lower financial capability and our citizens are twice as likely to use cash to pay for things<sup>20</sup>. We also have the highest rate of economic inactivity at 26.3%<sup>21</sup> compared to 21.8% in the UK<sup>22</sup>, and double the Disability and Carer's Benefit claimants<sup>23</sup> at c22.1%, compared to GB at c11.1%<sup>24</sup>.

Illegal lending remains an issue that is particularly prevalent in Northern Ireland, although it is accepted that the problem is significantly underreported. Our recent study into consumers' views and behaviours in response to the 'Rising Cost of Basics'<sup>25</sup> found 3% of respondents reported using illegal lenders.

<sup>19</sup> [Northern Ireland Household Expenditure Tracker Q2 2024](#), November 2024, Consumer Council

<sup>20</sup> [Financial Lives 2022](#), July 2023, Financial Conduct Authority

<sup>21</sup> [Economic Inactivity](#), January 2024, Ulster University

<sup>22</sup> [UK Labour Market Overview: October 2024](#), 15 October 2024, Office of National Statistics

<sup>23</sup> [Northern Ireland Benefits Statistics Summary](#), August 2024, Northern Ireland Statistics and Research Agency (published 27 November 2024)

<sup>24</sup> [DWP benefits statistics: November 2024](#), Department for Work & Pensions

<sup>25</sup> [Consumers' views and behaviours in response to the rising cost of basics](#), March 2024, Consumer Council

Northern Ireland's largest debt advice charity, Advice NI, reported their debt service was dealing with increasingly higher levels of illegal lending, with nearly £40,000 of debt dealt with during 2022-2023, averaging approximately £3,600 per debt. This was an increase of 61% from 2021-2022<sup>26</sup>.

---

<sup>26</sup> [Living in a Post-Pandemic World, September 2023](#): Advice NI

## 4. Our response to individual questions

In this section, we have set out our response to the proposed Plan of Work 2025/26 from Ofcom.

### 4.1 Individual questions

#### Question 1. Do you have any comments on Ofcom's proposed Plan of Work 2025/26.

The Consumer Council is pleased to respond to Ofcom's proposed Plan of Work for 2025/26 and will focus our response on two of the four priorities where we feel we have evidence or expertise that is relevant:

- Internet and post we can rely on
- We live a safer life online

#### Internet and post we can rely on

Ofcom's priority, 'Internet and post we can rely on' is focused on ensuring that consumers have access to high quality full-fibre capable networks and availability of communication and postal services. This represents a wide range of touch points for consumers and essential services, including broadband, mobile communications and postal services. It also aligns with three of the four strategic priorities of the Consumer Council 2021-2026 Corporate Plan: cost of living, EU Exit and digital inclusion.

The Consumer Council has undertaken a range of consumer research and advocacy to ensure the Northern Ireland consumer position is understood and represented and has highlighted key areas of consideration under each consumer outcome. In addition, we have focused on wider affordability concerns, which we believe should be a priority for Ofcom in the year ahead.

#### Affordability - all consumers

The findings of our most recent Pulse Survey show that the economic climate continues to be a source of concern for a significant proportion of Northern Ireland consumers, with 43% believing their household's financial status has deteriorated over the previous year.

This is also evident in our recent 'Rising Cost of Basics' research, where a large majority (90%) of consumers felt anxious or concerned about the affordability of the cost of basics, with 67% concerned about the affordability of telecoms, broadband and mobile.

The escalating financial strain is particularly concerning for vulnerable consumers, as our latest Household Expenditure Tracker indicates that the lowest earners in Northern Ireland have approximately £50 per week remaining after taxes and essential living expenses.

Our recent research on 'Broadband Affordability and Accessibility' indicates that customers continue to face affordability challenges. Twenty one percent of respondents stated that their broadband contract was not affordable, with 15% having struggled to pay their broadband bill during the past year. Of those who had struggled, 42% reduced expenditure in other areas to facilitate payment, and 22% had missed payments.

We recognise Ofcom's recent work in improving affordability measures, such as banning telecoms mid contract price rises; however, we are concerned that affordability is mentioned only once in the Ofcom Plan of Work 2025/26.

Considering the concerns of Northern Ireland consumers regarding telecoms affordability, we recommend that Ofcom not only monitor and report on the affordability of telecom services in the proposed 2025/26 work plan but also consider further affordability protections for consumers.

This recommendation aligns with three of our eight guiding consumer protection principles to ensure that Northern Ireland consumers have access, choice, and fairness of services.

## **Affordability - vulnerable consumers**

While Ofcom has encouraged companies to offer cheaper broadband and phone packages to help customers on low incomes, Consumer Council's 'Broadband Affordability and Accessibility' research found that 61% of consumers were unaware of social tariff or basic broadband packages.

According to our Household Expenditure Tracker, Northern Ireland's lowest earning households are more reliant on social securities, with 70% of income coming from benefits compared to 61% for lowest earning households in the UK.

We welcome Ofcom's commitment to report on social tariff availability, take-up figures and pricing trends and would recommend it also monitor this information by nation to provide insight on regional variations.

We would also recommend that Ofcom monitor consumer experience, satisfaction and usability of these packages, including ease of switching and supplier service, to ensure these products are delivered to eligible vulnerable consumers.

The Consumer Council believes that social tariffs should be accessible, simple to use and widely advertised, protecting the interest of vulnerable consumers and giving them access to fast and reliable networks and services. We look forward to working with Ofcom in the year ahead to raise awareness of social tariffs through our extensive outreach programme.

## **Availability of high-quality networks and services where they are needed**

Understanding regional differences is important, particularly in the area of telecoms and the unique considerations of cross-border and rural communities in Northern Ireland. To ensure all consumers receive the same protection, irrespective of where they are in the UK, it is vital regulators understand regional differences when considering interventions to protect consumers and prevent harm.

In October 2024 we welcome Ofcom's enhancement of mobile roaming protections, which were particularly important for Northern Ireland consumers. We would recommend that in the year ahead, Ofcom monitor that the protections are working to reduce consumer detriment, particularly in NI.

The Consumer Council 'Broadband Affordability and Accessibility' research in 2024 highlighted consumer concerns about the accessibility of services for rural compared to urban consumers in Northern Ireland. Nearly half (48%) of rural residents agreed that they have fewer choices of broadband providers because of where they live, which was more than double the number of urban residents who felt this way (23%).

We would recommend that Ofcom consider the availability of high-quality networks and services in Northern Ireland, particularly in rural communities.

## **Reliable and secure networks and services that people can depend on**

The Consumer Council 'Broadband Affordability and Accessibility' research provided an in-depth analysis of consumer experience and helped us better understand the geographical context of Northern Ireland consumers and their experiences and concerns about the affordability and accessibility of secure networks and services.

Nearly half (45%) of respondents had experienced an issue with their broadband provider over the last 12 months and while connection issues and speeds were the largest area of concern, there was significant dissatisfaction with customer services such as contacting companies, unexplained charges, changing terms and conditions and complaints. See Figure 1 below.

Figure 1: Issues with current broadband provider over the last 12 months



This research also identified that consumers residing in rural regions were markedly more inclined to experience reduced broadband speeds (40% against 16%) and more connectivity problems (31% versus 18%).

We recommend that Ofcom consider connectivity and customer service concerns on a regional basis to ensure the market is working for all consumers, particularly those in more vulnerable circumstance such as rural consumers.

## Efficient and sustainable markets where competition delivers choice, value and high-quality services

Choice, value and service are of key importance to Northern Ireland consumers; however, our 'Rising Cost of Basics' research illustrates that 41% of consumers find it difficult or very difficult to switch to save on internet and broadband services, and over a third (36%) found it difficult to switch and save on mobile phone services.

When asked why it is difficult to switch and save, the most common reasons cited included:

- being locked into or still in the contract
- the process to change provider is complicated/difficult
- there are too many options/variables to make comparisons
- difficult to understand and concerned about changing technology

The Consumer Council agrees that for consumers to get the right services for them, they need to be able to successfully engage with the market and they need clear information that they can easily understand.

In alignment with our consumer protection principles of choice, knowledge, education, fairness, and representation, we urge the ongoing consideration of vulnerable customers, particularly those in rural regions, to ensure they can also have choice, value and high quality services.

We will continue to support consumers through our outreach and information campaigns on telecoms affordability, highlighting cheaper mobile and broadband packages for vulnerable consumers and advising on mobile roaming rights and protections. We will continue to work in partnership with Ofcom in these areas.

## **Consumers treated fairly at every stage of the customer journey, regardless of their circumstances.**

According to Advice NI, both mobile and broadband debt are increasing in Northern Ireland, with mobile debt rising by 85% and internet debt rising by 367% in one year.

Our 'Rising Cost of Basics' research shows that a higher proportion of consumers in vulnerable circumstances are more concerned about the cost of communication and technology. Those in receipt of Universal Credit (79%) and those with a disability (74%) show higher levels of concern about the cost of communication and technology in comparison to the general population (67%).

As consumers continue to experience the cost-of-living crisis, it is vital that Ofcom encourage providers to support consumers facing financial hardship and put preventative measures in place to minimise detriment.

As detailed in the affordability section of this response, we would encourage Ofcom to monitor consumer experiences of social tariff packages to ensure these products are delivering to eligible, vulnerable consumers.

## **A sustainable, affordable postal service available across the UK that meets evolving customer needs**

### **Postal services**

In this section we will focus on the postal services element of Ofcom's strategic priority 'Internet and post we can rely on'.

We note Ofcom's stated intent that, in undertaking work to deliver this priority, is to achieve a number of outcomes for consumers and the outcome 'A sustainable, affordable postal service available across the UK that meets evolving consumer needs, which aligns to Ofcom's legal duty to ensure the universal service obligation on postal services is secured in the UK.

We note Ofcom's key project/programme specific to postal services to deliver the priority will include:

- Postal Universal Service Obligation (USO) review: Continued work regarding reform of the provision of a universal postal service with the aim of publishing a decision in Q2 2025/26 and continued work to ensure the quality-of-service regime incentivises Royal Mail to improve its performance and universal postal services continue to be affordable.

Alongside an ongoing programme to support Ofcom's work in this area:

- Postal monitoring: Continue monitoring work across the postal sector, which will look at the impact of obligations on the parcels market for the handling of complaints, the new obligation on operators to ensure the fair treatment of disabled customers, as well as Royal Mail's efficiency progress and the longer-term sustainability of the postal USO.

Our postal service section response will focus on three specific areas which relate to both of Ofcom's proposed projects for 2025/26. These are:

- Postal services USO reform
- Affordability
- Postal monitoring and quality of service

## **Postal services reform**

We welcome Ofcom's continued work on reform of the postal services USO. We acknowledge the need for reform of the USO due to changes in demand from letters to parcels in recent years.

Within this section, we will highlight key points, based on research we have conducted with Northern Ireland consumers on how the postal services universal service obligation (USO) can evolve to meet changing consumer needs.

The Consumer Council commissioned key research into the views of consumers on how potential changes to the USO may impact on them. This was qualitative research titled 'Qualitative study on the impact on consumers of changes to Royal Mail's universal service obligation'<sup>27</sup> and was published in November 2024. Key findings from the research include:

- How the postal service remains an important method of communication for consumers.
- It is particularly important for consumers in rural and remote areas, and for vulnerable users who might otherwise be at risk of social and/or economic exclusion.
- Having uniform prices throughout the UK and the same service standards was positively received across the focus groups.
- The most important obligations were considered the frequency of delivery and collection of letters and parcels.
- The frequency of the service was essential for those who received a significant number of medical appointments through the post.

The research showed that there was a sense of frustration across the focus groups at the idea of prices increasing, but the frequency of delivery and collection decreasing as the current frequency of delivery and collection matched their needs

---

<sup>27</sup> [Qualitative study on the impact on consumers of changes to Royal Mail's Universal Service Obligation](#) November 2024, Consumer Council

and that any potential reduction in the frequency of delivery and collection felt like a backward step rather than an evolution to meet consumers' needs.

It was clear these individuals relied on the postal service for important documents. It is important that any changes to the USO, particularly regarding frequency and speed, considers impact on consumers and consideration is given to mitigate these impacts. We urge Ofcom to continue to ensure the retention of key features of the USO.

As referenced previously in our response, the unique position of Northern Ireland being part of the UK and sharing a land border with the Republic of Ireland (ROI) has shown to create logistical challenges for postal services. Implementation of the Windsor Framework will affect parcel delivery data requirements when sending parcels from Great Britain to Northern Ireland. It is essential that this does not adversely affect NI consumer access and choice when receiving parcels from Great Britain. Ofcom should ensure the parcel USO consumer protections are not eroded for Northern Ireland consumers.

Whilst we appreciate Ofcom declined a request from Royal Mail in 2017 to include track and trace on their standard USO products. Research commissioned by The Consumer Council in 2020 titled 'The universal postal service and Northern Ireland consumers'<sup>28</sup> included a recommendation to include track and trace services across all USO products.

Given the continued growth in the parcel market, scams are becoming more sophisticated. The Consumer Council commissioned research titled 'Impact of scams on Northern Ireland consumers'<sup>29</sup> in 2022 which found that:

- Parcel delivery scams were the most common for those who have been scammed, with 59% of those who have experienced a scam saying they were targeted by a parcel delivery scam.

Further research conducted by The Consumer Council in 2024 titled 'Northern Ireland Consumer Insight Report: Parcel Delivery Services'<sup>30</sup> found that:

- 63% of consumers stated that a parcel was left at an insecure location around their property in full view of others.

We would encourage Ofcom to carefully revisit the decision to not include track and trace on standard USO products as inclusion of this is a potential addition to develop the USO to meet evolving consumer needs.

The Ofcom 'Call for input: The future of the universal postal service'<sup>31</sup> highlighted how consumer advocacy bodies have identified other areas of potential consumer concerns such as support for people during periods when they do not have safe access to a fixed address (e.g. due to homelessness or because they are a victim of domestic abuse)

---

<sup>28</sup> [The universal postal service and Northern Ireland consumers](#), September 2020, Consumer Council

<sup>29</sup> [Impact of scams on Northern Ireland consumers](#), September 2022, Consumer Council

<sup>30</sup> Northern Ireland Consumer Insight Report: Parcel Delivery Services - To be published

<sup>31</sup> [Call for input: The future of the universal postal service](#), January 2024, Ofcom

To make the USO truly universal all consumers need access to post. We have been working with Consumer Scotland and Citizens Advice England and Wales, exploring options to ensure the USO is truly universal.

We welcomed Ofcom taking the lead to convene a roundtable discussion on this important topic in October 2024 and we are keen to continue to work with the other consumer advocacy bodies across the UK, Ofcom, Royal mail and other key stakeholders to find a solution to this for those consumers that are impacted.

We note Ofcom's plan to publish a detailed consultation in quarter four 2024/25 on proposals for reform of the postal services USO. We will respond to this consultation to highlight the consumer experiences of postal services, particularly in relation to the USO and how potential changes to this may impact them.

We welcome continued engagement with Ofcom throughout the 2025/26 FWP and beyond, to ensure that any changes to the USO goes beyond sustainability, but to truly meet evolving consumer need.

## **Affordability**

The Consumer Council recognise the need for Ofcom to ensure the financial sustainability and efficiency of the universal service and whilst we accept that the postal market has changed significantly since the Universal Service Obligation (USO), minimum requirements must still include consumer safeguards against detrimental market forces, particularly for those most vulnerable.

Our research 'Qualitative study on the impact on consumers of changes to Royal Mail's universal service obligation'<sup>32</sup> shows that uniformity is key, both in terms of pricing and service.

- Our consumers were reassured that the universal postal service would never differentiate between different parts of the UK when it came to pricing.
- There was concern that Royal Mail prices had increased significantly preventing some participants from using the universal postal service and in particular with regards to the cost of stamps with figures from our latest household expenditure tracker<sup>33</sup> showing that the current price of first-class stamps represents a 3% of the total disposable income per week from our lowest earning households.
- The cost-of-living crisis was a common concern.
- There was a sense of frustration at the idea of prices increasing and delivery frequency decreasing.
- The rising cost of stamps was preventing some older participants from using the universal postal service.

Another of the key findings from the research was the concern that Royal Mail prices had increased significantly, in particular the cost of stamps. As households have

---

<sup>32</sup> [Qualitative study on the impact on consumers of changes to Royal Mail's Universal Service Obligation](#) November 2024, Consumer Council

<sup>33</sup> [Northern Ireland Household Expenditure Tracker Q2 2024](#), November 2024, Consumer Council

faced these cost-of-living pressures, Royal Mail has increased the price of stamps for its USO products.

In April 2022 a first-class letter stamp cost 95p and a second-class stamp cost 68p. As of January 2025<sup>34</sup>, a first-class letter stamp now costs £1.65 and a second class stamp costs 85p.

Despite the current price cap on second class letters and small parcels, some of those who depended heavily on the services provided by Royal Mail were worried that if prices continued to increase, they would not be able to afford to use the services.

As previously mentioned, The Consumer Council regularly conducts research to understand the household income and expenditure of consumers in Northern Ireland, with comparatives to the UK average. The latest Northern Ireland household expenditure tracker<sup>35</sup> which covers Quarter 2 of 2024 found that:

- 50% of Northern Ireland households have less than £90 per week average after their essential spending costs.
- Households have 8% less income before tax than the UK average and that these households spend 53% of their total basic spending on food, rent, energy and transport.

This highlights the pressures that households across Northern Ireland are facing and how previous increases to the price of stamps, and any future price increases, may impact on consumers ability to access postal services.

We encourage Ofcom to consider the financial implications on consumers in any changes to the USO and ensure appropriate safeguards remain in place, particularly to protect consumers in the most vulnerable circumstances.

## **Monitoring and quality of service**

The Consumer Council welcomes Ofcom's decision to continue monitoring work across the postal sector, which will look at the impact of obligations on the parcels market for the handling of complaints, the obligation on operators to ensure the fair treatment of disabled customers, and Royal Mail's efficiency progress and the longer-term sustainability of the USO.

The Consumer Council handles enquiries and complaints from consumers in Northern Ireland in relation to postal services. In 2023/24 we were contacted by 181 consumers with postal queries and supported 8 consumers with postal complaints related to a range of issues such as mail delivery, Brexit, delivery/sorting office, Post Office and redirection failures. So far in 2024/25 we have supported 82 consumers with queries and assisted on 7 complaints with issues regarding: mail delivery and Post office customers service issues.

---

<sup>34</sup> [Current Postal Prices](#), January 2025, Royal Mail

<sup>35</sup> [Northern Ireland Household Expenditure Tracker Q2 2024](#), November 2024, Consumer Council

We welcome Ofcom's plan to continue to monitor the impact of guidance and obligations in the parcels market for the handling of complaints and treatment of disabled consumers. We welcome that Ofcom fined Royal Mail £5.6m in November 2023 for missing delivery targets<sup>36</sup> and then fined Royal Mail again in December 2024 for a total of £10.5m for poor delivery performance<sup>37</sup>.

The Consumer Council commissioned research titled 'Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation' in 2023 which found the perception of Northern Ireland consumers on the current reliability of postal services and the impact this had on them. Examples within the research include how:

- Many participants had noted a decline in reliability regarding the length of time it took for letters to be delivered.
- They tended to use first class services, despite them being more expensive than second class (there was a strong perception that first class no longer meant delivery the following day as it had in the past).
- With many feeling that first class was more likely to be delivered within the timeframe of what second class used to be (2-3 days), if not longer.
- There was a sense that trying to get a letter delivered within a working week was a risk with second class.
- The negative impact of reduced reliability had on hospital appointments was highlighted by participants.

We encourage Ofcom to continue review the quality-of-service conditions and ensure these meet the needs of consumers.

We welcome Ofcom's continued postal monitoring work and welcome continued engagement with Ofcom to ensure Northern Ireland consumers experiences of postal services are represented.

## **We live a safer life online**

Digital inclusion is one of the four primary consumer priorities outlined in the Consumer Council's Corporate Plan for 2021-2026. Regulation and independent oversight must keep pace with the rapid innovation in digital markets, with public policy ensuring the inclusion and protection of all citizens.

Research from the Consumer Council shows that two in five (44%) consumers had been targeted by a scam in the past three years<sup>38</sup>. Amongst those targeted by a scam, email (62%), telephone call (50%), and text message (42%) were the most likely methods used.

---

<sup>36</sup> [Royal Mail fined £5.6m for missing delivery targets](#), November 2023, Ofcom

<sup>37</sup> [Ofcom fines Royal Mail £10.5m for poor delivery performance](#), December 2024, Ofcom

<sup>38</sup> 'Consumer expenditure, consumer problems, and scams' - yet to be published, Consumer Council

Amongst those who fell victim to a scam, 83% were impacted financially, whilst 38% had their physical or emotional wellbeing affected adversely.

In 2025-26 much focus will be on Ofcom's new online safety powers; however, it is vital that Ofcom continue to focus on making it difficult for scammers to use UK telecoms networks to harm consumers.

While we welcome Ofcom's new responsibilities in administering the new online safety regime, Ofcom must work with other regulators where markets intersect to ensure consumers have positive opportunities, access and outcomes when interacting with digital markets.

In the year ahead Ofcom must promote understanding of the new online safety regime and engage consumers with its Media Literacy Plan. This enhanced authority will require collaboration with the NI government and civil society in Northern Ireland to foster comprehension of the new framework and assist initiatives aimed at enabling individuals to lead safer online lives.

To set up the online safety regime for success, with the right people, systems, processes and relationships in place, it will be important to work with other partners and regulators to ensure consumers have positive outcomes when interacting with digital markets.

We welcome the opportunity to collaborate with Ofcom, as partnership will be essential to ensure the online safety regime is understood by consumers and helps them to improve their online safety.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Consumer Council consents to this response being published.

[REDACTED]

