



Post Office Limited

Code of Practice on Public Consultation and
Communication with respect to change in
the Post Office[®] network

CODE OF PRACTICE ON PUBLIC CONSULTATION AND COMMUNICATION WITH RESPECT TO CHANGE IN THE POST OFFICE® NETWORK

1. OPENING STATEMENT

Post Office Limited's aim is for the size of its network to be stable at around the level as at the completion of the Network Change Programme¹ in 2009. This is consistent with the funding that Government has put in place until 2011 and with ensuring that the access criteria outlined by Government are met. This Code of Practice, therefore, applies to the handling of the localised changes that can and do happen across such a large network for all sorts of reasons. When these changes do happen, whether they are planned or whether they occur without warning, we will always ensure that the minimum access criteria outlined by the Government are met and that the needs of customers are taken into account as much as is possible.

Local changes can happen:

- as a result of a specific and unforeseen event (for example, a flood or fire causing an outlet to close or a subpostmaster suddenly not being in a position to run the outlet);
- due to the subpostmaster resigning their contract and not making the premises, in which the Post Office® is located, available to a future subpostmaster;
- because no new subpostmaster can be found able to replace a retiring subpostmaster; or
- because, in a particular place, it makes sense to make changes to ensure we have the right services in the right places in a way that is sustainable and efficient for the future.

This Code of Practice sets out how we will communicate and explain these local changes, how and when we will ask for your views and how we will consider them.

This Code of Practice doesn't cover outlets that have been, or may be, established by Local Authorities or other organisations under 'local funding arrangements.'² Such outlets will always be additional to the numbers required to meet the minimum access criteria outlined by the Government (see Appendix 2) and are dependent on the situation of the funding body. Nor does this Code cover circumstances where a major change programme (like the recent Network Change Programme) is needed because of, for example a significant change in the level of funding available to the network as a whole. In such circumstances, Post Office Limited will separately discuss with Consumer Focus what consultation arrangements may be appropriate.

This Code of Practice will supersede all previous codes from 1 April 2009 for any network changes other than those that are directly related to the formal Network Change Programme. Adherence to the Code will be monitored by Consumer Focus and in March 2010 there will be a review between Post Office Limited and Consumer Focus to check that the Code remains fit for purpose. Further reviews will take place thereafter with the next review in 2011.

¹ The Network Change Programme was a major change programme instigated by the Government to put the Post Office® network on a more stable footing for the future.

² A 'locally funded' outlet is in addition to Post Office Limited's network, is not required to meet the Government access criteria and is not supported by the Network Subsidy Payment.

2. PURPOSE OF CODE

This Code of Practice explains how we (Post Office Limited) will let you (customers and local representatives) know about changes to your local Post Office[®] network, why they are occurring and upon what basis we have established the way forward. The Code also covers the circumstances in which we are likely to ask for your comments on these changes, and how we will consider them. It is important to recognise that the situations that might cause changes in the network are many and varied. The changes covered by this Code will cover individual branches rather than major programmes of national change required by Government across the network. The Code includes those cases where we will ask you for your views. In these cases, we will explain the background to the change, and we will focus on areas where your views can help in our decision on the best way forward for services in the area.

3. TYPES OF CHANGE

There are several different triggers for changes to your local Post Office[®] outlet. The different categories are outlined below

Minor change

Minor changes are changes in the way the outlet operates. They include (but are not limited to) small changes to the opening hours or other elements in the branch operation (such as changes to service positions / interior design etc). The Code is not intended to apply to minor changes in the way that an individual branch operates, and these changes are not subject to consultation. For the avoidance of doubt, minor changes in physical capacity, changes in the product range available at the counter, changes to opening times or days of the week, or the introduction of an associated retail offer are considered minor changes and are not therefore matters for consultation.

Temporary Service Interruption

Sometimes unplanned changes to the Post Office[®] network will happen at short notice, for reasons beyond our control (for example, a Post Office[®] might need to close because of a building problem such as flooding). Where this is the case, we will try to notify you as soon as possible.

With a temporary service interruption, we will aim to restore the service on a broadly similar basis to what went before at the same location, or very close to it, as quickly as possible. As such, and given the emphasis on speed of activity to ensure the service interruption is as temporary as possible, this would not be a matter for public consultation – rather it is an issue of effective communication to keep customers informed. Occasionally, such resumption of service is not possible and, in such cases, we will draw up plans on future service provision in the area and they will then be subject to consultation as per the categories below.

Unplanned Closure

If permanent closure of a Post Office[®] in its current location is unavoidable, for example because a property lease expires or a subpostmaster resigns, we will work to put together a way forward to provide suitable services to the area going forward. Depending on individual circumstances, the plan for an area might be:

- to reopen the branch somewhere else;
- to incorporate a Post Office[®] into an existing shop;
- to open an alternative service point, for example an outreach;
- to improve services (for example by extending opening hours) at other Post Office[®] branches; or
- in some cases, we may consider that the remaining level of service in the area is enough to meet local demand, and offers reasonable access for people living near the Post Office[®] that is closing down, so no extra services elsewhere are needed.

In these cases, we will put together a practical way forward, contacting the relevant local authority in doing so. We will also make sure that national access criteria outlined by the Government continue to be met and that local factors are taken into account. We will explain the proposal to the public and consult on specific issues within the proposal by asking distinct questions of the public.

Planned local Network Change

There may be occasions when we proactively seek to change your local network, working within the access criteria outlined by the Government, to ensure that service provision is efficient, effective and sustainable for customers in a particular locality. These plans might involve closure of an outlet, the merger of an outlet, converting a Crown branch into a franchised branch, replacing an outlet with a different operating model (such as a form of outreach). In these cases, we will put together a practical way forward, contacting the relevant local authority in doing so. We will also make sure that access criteria outlined by the Government continue to be met and that local factors are taken into account. We will explain the proposal to the public in a consultation exercise which will focus on specific issues within the proposal by asking distinct questions of the public.

A note on Outreach services introduced within the Network Change Programme of 2007-8

Specific arrangements have been established with respect to 'reconsultations' where there is a significant subsequent change to the outreach branch proposal that was made, and consulted upon, as part of the Network Change Programme of 2007/8. For these branches a consultation process may be necessary if there is a revised proposition which offers significantly fewer hours of service than the original proposition or if there is a change of location that would significantly reduce customers' access to the service. These arrangements will stay in place for these branches through to March 2010 when they will be reviewed as part of the wider review of this Code of Practice (see 8 below).

4. HOW WE COMMUNICATE AND CONSULT

Minor Change

Consultation and Communication

There is no requirement for consultation on minor changes.

The communication with customers will depend on the nature of the change. We will endeavour to display a suitably visible notice in the outlet giving at least 4 weeks advance notice of the change, where appropriate.

Temporary Service Interruption

Consultation and Communication

For the avoidance of doubt, if a Post Office[®] closes at short notice and a replacement facility on broadly the same basis as before is established, at the same or nearby location (i.e. within half a mile), customers and local representatives will be notified, but there will not be a need for a wider consultation on our plans for a continuation of services in an area.

The notification will take the form of a poster (in a suitably visible location) at the affected location for customers, and a letter to local representatives. We will aim to inform local representatives of any temporary service interruption within two weeks of the event, but this may take longer depending on individual circumstances (it may not always be possible to provide clear information on the reasons for the closure or the expected date of reopening straight away).

We will issue a local press notice if a Post Office[®] closes with no prior notice and it is not possible to display a poster on the window/door of the branch or immediately outside the Post Office[®] (i.e. in an enclosed poster display site). If the closure is temporary and the Post Office[®] will be reopened within 5 days, there will be no need to issue a press notice.

Unplanned Closure

Consultation and Communication

Where we need to respond to an unplanned closure in our network which cannot be resolved as a temporary service interruption as above, we will put together a proposal to achieve the appropriate provision of service in the area in the future. This may include, for example,

- to reopen the branch somewhere else;
- to incorporate a Post Office[®] into an existing shop;
- to open an alternative service point, for example an outreach;
- to improve services (for example by extending opening hours) at other Post Office[®] branches.

In some cases, we may consider that the remaining level of service in the area is enough to meet local demand, and offers reasonable access for people living near the Post Office[®] that is closing down, so no extra services elsewhere are needed.

In putting together our proposal we will ensure that any proposed changes to the network will be consistent with the access criteria outlined by the Government and its current funding arrangements. Local factors, such as the availability of public transport, alternative access to key Post Office[®] services (such as cash withdrawals, bill payments, mail services), terrain, local demographics and the impact on local economies, will be used in helping construct a proposal. We will discuss the situation with the relevant local authority.

We will therefore establish a proposal that we believe is the most appropriate in an area, with regards to the level of demand for Post Office[®] services, the location and capacity of alternative Post Offices[®], financial viability for Post Office Limited and (where relevant) the subpostmaster(s). We will put our proposal into a local public consultation process before making a decision.

We will provide materials to local representatives (as defined at Appendix 3) and customers that will:

- inform customers why the change is necessary;
- explain the nature of the change (e.g. if the Post Office[®] is closing, if a new Post Office[®] is opening instead nearby etc);
- outline the implications for service provision, including (where relevant) distance and terrain to alternative branches, its opening hours, proximity to parking, public transport etc, ease of access to the branch, the effect on the range of services to be offered and on the number of serving positions;
- outline the reasons why the change is planned. This explanation will not however include any information that is commercially confidential to us or to the subpostmaster, such as details of the financial circumstances of the branch;
- ask specific questions related to the proposal and provide an address for people to send comments together with a timescale for those comments.

We will put up posters (in a suitably visible location) in the outlets that are due to close or move and make available leaflets in those outlets that explain this Code of Practice. We will also write to local representatives, saying what we plan to do and asking for comments where appropriate. Information on the consultation will also be put on our website.

This local public consultation will be for a period of 6 weeks (with extension arrangements in certain circumstances as outlined in Appendix one).

Planned local Network Change

Consultation and Communication

There may be circumstances where we plan to make proactive changes to the network in a locality (over and above the changes to individual branches outlined above), which may have a potential impact on access to Post Office[®] services. In these cases we will put our proposition into a local public consultation process before making a decision.

In putting together our plan, we will ensure that any proposed changes to the network will be consistent with the access criteria outlined by the Government and its current funding arrangements. Local factors, such as the availability of public transport, alternative access to key Post Office[®] services (such as cash withdrawals, bill payments, mail services), terrain, local demographics and the impact on local economies, will be used in helping construct a proposal. We will discuss the situation with the relevant local authority.

We will therefore establish a plan that we believe is the most appropriate in an area, with regards to the level of demand for Post Office[®] services, the location and capacity of alternative Post Offices[®], financial viability for us and (where relevant) the subpostmaster(s).

We will provide materials to local representatives and customers that will:

- inform customers why the change is necessary;
- explain the nature of the change (e.g. if any Post Offices[®] are closing, if any new Post Offices[®] are opening instead nearby etc);
- outline the implications for service provision, including (where relevant) distance and terrain to alternative branches, it's opening hours, proximity to parking, public transport etc, ease of access to the branch, the effect on the range of services to be offered and on the number of serving positions;
- outline the reasons why the change is planned. This explanation will not however include any information that is commercially confidential to us, such as details of the financial circumstances of the branch;
- ask specific questions related to the proposal and provide an address for people to send comments together with a timescale for those comments.

We will put up posters (in a suitably visible location) in the outlets that are due to close or move and make available leaflets in those outlets that explain this Code of Practice. We will also write to local representatives, saying what we plan to do and asking for comments where appropriate. Information on the consultation will also be put on our website.

This local public consultation will be for a period of 6 weeks (with extension arrangements in certain circumstances as outlined in Appendix one).

A note on the consultation process

We want to make our consultation process simple and clear for all our customers. Each individual consultation will explain the proposed change and the reason for the change. We will then ask specific questions on which we would like your feedback. This will make sure that we get the best information available locally before we make any final decisions. For example, if we propose to convert an outlet into a franchise, specific comments will be sought on the service issues – rather than on the principle of the change. Similarly where we face an unplanned closure and we propose to replace the Post Office[®] with an Outreach service point, comments may be invited on certain service implications of these changes, but not on the principle of the change itself. Customers will be asked to contact the Post Office[®] Consultation team with their views. We will provide a range of methods for communication including via post, by email or by handing their correspondence into the relevant branch so that it can be forwarded to the Post Office[®] Consultation team.

Timescales for consultations

For all network changes on which we invite feedback, you will have 6 weeks to tell us how you think the changes will affect you. However if we propose to permanently close one of our Crown Offices that we manage ourselves, you will have 12 weeks.

For the avoidance of doubt

- the period for receipt of comments on the service implications of network changes such as conversion of a Crown Post Office[®] will be six weeks;
- the period for receipt of comments on plans to close a Post Office[®] operated by a subpostmaster or franchisee will be six weeks;
- the period for receipt of comments on plans to close a Crown Post Office[®] operated by Post Office Ltd will be twelve weeks;

In certain circumstances there will be an extension to these timescales (please see Appendix one).

5. HOW WE TAKE ACCOUNT OF YOUR VIEWS

Comments and views in response to the questions asked will be considered and if consultees raise other points that can be practically taken into account given the circumstances of the particular change, these can also be considered. We will take account of the responses from the consultation process in making a decision on the best way forward and then finalise the plans for the Post Office[®] in question. Post Office Limited will ensure that in conducting any consultation or in making any decision to which this Code of Practice relates, it will give due regard to the needs of disabled people and to the needs of any other vulnerable or relevant demographic group.

6. HOW WE COMMUNICATE DECISIONS

We would expect to make a decision within 4 weeks of the close of the consultation. When a decision is made, we will put up a poster in the branch to tell you our decision and provide notification on our website. We will also write to local representatives to outline and respond to the main issues raised in comments to us, and to explain the final approach that will be implemented. You should take this poster and these letters as notice that the changes will be made. The changes will take effect at least 4 weeks after the decision is announced, unless there are exceptional circumstances.

7. WHAT TO DO IF YOU FEEL THIS CODE OF PRACTICE HAS NOT BEEN FOLLOWED

We will always endeavour to ensure that this Code of Practice is followed as we manage change in the network. If, however, you feel that this Code of Practice has not been adhered to - either in whole or in part - in a particular case, you can take the following steps:

Step 1: Contact us so that we can review your concerns and respond to you in writing within ten working days. Our response will contain contact information so that if you remain unhappy with our response you may refer the matter back to us.

Step 2: If you refer the matter back to us, we will look at it again and provide a further response within 10 working days. This response will explain the next steps that you can take to refer your concerns about non-adherence to this Code to Consumer Focus, the body representing the interests of consumers. We will provide you with a unique reference number which will allow you to identify the case to Consumer Focus and relevant contact points within Consumer Focus should you feel that step is appropriate.

Step 3: If you remain dissatisfied with our responses under Step 1 and 2, you can then ask Consumer Focus to investigate your concerns about whether the Code has been adhered to. In order to do this, Consumer Focus will require a copy of both the response you have received from Post Office Limited and the unique reference number that you have received.

Consumer Focus will then make an independent assessment of whether the Code has been followed in the particular case you have raised. Consumer Focus also has the ability to refer the matter back to us and, where appropriate, to recommend any actions with respect to the complaint.

It should be noted that this process of referral to Consumer Focus refers to the process of the consultation, it is not an appeal process against the specific final decision which rests with Post Office Limited.

8. REVIEW OF THIS CODE OF PRACTICE

We intend to review this Code of Practice with Consumer Focus in March 2010. Subsequent review periods will be determined then, but the current aspiration of all parties is that there should be a further review in 2011.

9. CONTACT ADDRESSES

Post Office Limited

✉ Post Office Limited
c/o National Consultation Team
PO Box 2060
WATFORD
WD18 8ZW

✉ consultation@postoffice.co.uk

🌐 www.postoffice.co.uk

Consumer Focus

✉ Freepost Consumer Focus
(BAU Unit)

✉ baupost@consumerfocus.org.uk

For additional enquiries contact:

☎ Customer Helpline: 08457 22 33 44
Textphone: 08457 22 33 55
The line is open between
8:15am and 6pm weekdays and
8:30am and 7pm on Saturday

10. A STATEMENT FROM CONSUMER FOCUS ON ITS ROLE IN RELATION TO PUBLIC CONSULTATIONS

Consumer Focus is the new body championing the interests of consumers. Consumer Focus will work to ensure that consumers benefit from good access to services. We recognise that where Post Office Limited proposes certain changes to its network, which are outlined in this Code of Practice, it is important that customers are consulted and that Post Office Limited takes account of the consumer feedback received. While Consumer Focus does not have the power to veto the proposals of Post Office Limited, we will monitor how Post Office Limited consults on its proposals, and will investigate where a customer feels the procedures set out in this Code of Practice were not followed. Consumer Focus will also monitor proposals to ensure these meet the Government's access criteria for minimum Post Office[®] provision.

Appendix One

Extensions to standard consultation periods

Christmas / New Year	No proposal / decision announcements are to be made between 18 Dec – 2 Jan (inclusive) – unless operationally urgent to do so i.e. unplanned network change
Christmas / New Year	All full 6 week consultation periods spanning 24 Dec – 2 Jan (inclusive) must be extended by 10 calendar days.
Easter	All full 6 week consultation periods carried out over the Easter Bank Holiday periods are to be extended by 2 working days
Summer July <i>Scotland & Northern Ireland only</i>	If a 6 week consultation includes more than 4 calendar weeks in the month of July, then the consultation period will be extended by one calendar week.
Summer August <i>England & Wales only</i>	If a 6 week consultation includes more than 4 calendar weeks in the month of August, then the consultation period will be extended by one calendar week.
Other Bank Holiday periods	NO CHANGE to the current consultation process
Crown Office Closures	NO CHANGE to the current 12 week consultation process

Appendix Two

The Government minimum access criteria

Nationally:

- 99% of the UK population to be within 3 miles and 90% of the population to be within 1 mile of their nearest Post Office[®] branch.
- 99% of the total population in deprived urban³ areas across the UK to be within 1 mile of their nearest Post Office[®] branch.
- 95% of the total urban⁴ population across the UK to be within 1 mile of their nearest Post Office[®] branch.
- 95% of the total rural⁵ population across the UK to be within 3 miles of their nearest Post Office[®] branch.

In addition, for each individual postcode district:

- 95% of the population of the postcode district to be within 6 miles of their nearest Post Office[®] branch.

³ Deprived urban – The most disadvantaged urban parts of the UK based on the Indices of Multiple Deprivation (top 15% Super Output Areas in England, 15% of Data Zones in Scotland and 30% of Super Output Areas in Wales and Northern Ireland).

⁴ Urban – A community with 10,000 or more inhabitants in a continuous built up area.

⁵ Rural – A community not covered by the definition of Urban above.

Appendix Three

List of Local Representatives

The local Member of Parliament/ Scottish Parliament/Welsh Assembly/Northern Ireland Assembly;
Unitary Authority;
County / District Council Community Council (Wales) as appropriate
National Association of Local Councils
Chamber of Commerce
Rural Community Council (where applicable);
The National Federation of Subpostmasters;
Regional Development Agencies;
National and local disability groups
Any local Strategic Partnerships; and

Other bodies are welcome to comment on proposed changes to the network, in response to posters placed in branches or information on our website.

NB. Correspondence sent to local authorities will be sent for the attention of the Chief Executive

Consumer Focus will be informed of any local consultations that are taking place.