December 2024

**To Ministry of Business Innovation and Employment**

Please find attached our submission on the: Moving towards a financially sustainable mail service discussion paper

For any further inquiries, please contact:

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**Introducing Disabled Persons Assembly NZ**

**We work on systemic change for the equity of disabled people**

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People’s Organisation run by and for disabled people.

**We recognise:**

* Māori as Tangata Whenua and [Te Tiriti o Waitangi](https://www.archives.govt.nz/discover-our-stories/the-treaty-of-waitangi) as the founding document of Aotearoa New Zealand;
* disabled people as experts on their own lives;
* the [Social Model of Disability](https://www.odi.govt.nz/guidance-and-resources/guidance-for-policy-makes/) as the guiding principle for interpreting disability and impairment;
* the [United Nations Convention on the Rights of Persons with Disabilities](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html) as the basis for disabled people’s relationship with the State;
* the [New Zealand Disability Strategy](https://www.odi.govt.nz/nz-disability-strategy/) as Government agencies’ guide on disability issues; and
* the [Enabling Good Lives Principles](https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/), [Whāia Te Ao Mārama: Māori Disability Action Plan](https://www.health.govt.nz/publication/whaia-te-ao-marama-2018-2022-maori-disability-action-plan), and [Faiva Ora: National Pasifika Disability Disability Plan](https://www.moh.govt.nz/notebook/nbbooks.nsf/0/5E544A3A23BEAECDCC2580FE007F7518/%24file/faiva-ora-2016-2021-national-pasifika-disability-plan-feb17.pdf) as avenues to disabled people gaining greater choice and control over their lives and supports.

**We drive systemic change through:**

**Rangatiratanga / Leadership**: reflecting the collective voice of disabled people, locally, nationally and internationally.

**Pārongo me te tohutohu / Information and advice**: informing and advising on policies impacting on the lives of disabled people.

**Kōkiri / Advocacy**: supporting disabled people to have a voice, including a collective voice, in society.

**Aroturuki / Monitoring**: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

## United Nations Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),[[1]](#footnote-2) a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention.

The following UNCRPD articles are particularly relevant to this submission:

* **Article 8 – Awareness raising**
* **Article 9 – Accessibility**
* **Article 22 – Respect for privacy**
* **Article 28 – Adequate standard of living and social protection**

## New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy[[2]](#footnote-3) to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision.

The following outcomes are particularly relevant to this submission:

* **Outcome 2 – Employment and Economic Security**
* **Outcome 5 – Accessibility**
* **Outcome 7 – Choice and Control**

# The Submission

DPA welcomes this opportunity to feedback to the Ministry of Business Innovation and Employment (MBIE) on the “Moving towards a financially sustainable mail service consultation.”

DPA is very concerned by the proposals for service reductions in this document.

We acknowledge the challenges facing the traditional postal system due to the uptake of digital methods of communication, including email.

However, the rise of modern communications has seen an increasing digital divide emerge with people not being able to access full digital services due to cost, accessibility, and geographical factors.

Groups who are highly overrepresented in digital exclusion statistics include disabled people, people living in insecure housing situations, refugees and migrants with English as a second language, people living in rural communities and unemployed people.[[3]](#footnote-4)

According to a report on digital exclusion and disabled people compiled for the Department of Internal Affairs, digital exclusion for disabled people takes the form of barriers including general inaccessibility of web content, poor web accessibility, lower digital skills, non-enforcement of the Web Accessibility Standard, high costs, inaccessible devices and the need to rely more on support people to access [[4]](#footnote-5)￼

There is a high interrelationship as well between ageing and disability. Research from Citizens Advice Bureau (CAB) has shown that there is an overlap between several of the digitally excluded groups mentioned above and older people within the population in terms of their ability to use digital services.[[5]](#footnote-6)

It is important that both MBIE and NZ Post puts the interests of disabled and older people as well as other groups who currently experience digital exclusion at the forefront of any decisions around change.

This leads to our first recommendation:

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| **Recommendation 1:** that MBIE and New Zealand Post change the Deed of Understanding to include a postal services transition plan enabling the retention of current service levels until the next review is triggered. |

DPA further asks that this transition plan be drawn up by MBIE and NZ Post in full partnership with digitally excluded communities, including disabled people, older people, Māori, ethnic/refugee communities, rural communities and any others who may be identified through this consultation process.

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| **Recommendation 2:** that any postal services transition plan is drawn up in partnership with impacted communities including disabled people. |

We believe that a transitional plan is necessary as further reductions to mail services in the absence of such a plan risks the creation of a full-blown communications divide where people, who can easily access digital modes of communication will be able to fully participate in society while those who cannot access them will be excluded entirely.

As a society, we need to avoid this outcome.

**Impacts on disabled people**

We now turn to specifically outlining the impacts that the proposed changes to mail services will have on disabled people:

* Minimum **two** days per week postal delivery in urban areas.
* Minimum **three** days per week postal delivery in rural areas.
* Minimum **two** days per week postal delivery to PO Boxes and Private Bags.
* Language around non-consecutive days will be removed to provide operational flexibility, noting that NZ Post has commercially set, published targets on mail delivery timeframes.

The proposed changes will contrast with the current arrangements which are:

* Minimum **three** days per week delivery in urban areas.
* Minimum **five** days per week delivery in rural areas.
* Minimum **five** days per week to PO boxes and Private Bags.
* Urban delivery days must be non-consecutive (i.e. there is a space between days on which mail is delivered).

Firstly, disabled people in rural areas will be affected. Some courier services are no longer delivering to rural delivery areas, so the importance of postal delivery is vital.

Secondly, given that a significant proportion of Māori are digitally excluded, there will be an impact on tangata whaikaha disabled Māori from any reduction in postal services.

Thirdly, disabled people receive printed cards required to access services and support(s) including Total Mobility ID cards, mobility parking permits, Hāpai access cards, Kiwi Access Card and Companion Cards with the need for timely delivery being paramount. While it is likely that these cards will transition to being electronically available as apps in the future, it will still be sometime before this happens given the digital divide that exists for many disabled people.

In the meantime, it is important that postal services are available so that people can receive these important cards through the post as these enable community participation and inclusion for many disabled people.

Fourthly, some disabled and older people still rely on formal letters to receive information regarding essential appointments with Work and Income NZ (WINZ), health services and disability providers and face sanctions if they fail to turn up for these appointments.

While many disabled and older people now receive electronic notifications about upcoming appointments and other essential matters, there are still a significant number of disabled people who due to living, for example, in digitally underserved areas are reliant on access to postal services to receive these notices.

However, due to the successive downgrading of postal services, mail now reaches people from mail providers, including New Zealand Post, less efficiently than in the past with some of our members reporting that they have received letters regarding WINZ or health appointments sometimes days or even weeks after they have passed.

At a time when beneficiaries (including disabled people who are classified as jobseekers) have greater obligations to engage with WINZ and as health services are under growing strain meaning that attendance at appointments is crucial, it is important that NZ Post improves its performance regarding the delivery of mail, including to people and communities who experience digital exclusion.

For this reason, DPA disagrees with the removal of language around delivery on non-consecutive days and its replacement by terms giving NZ Post greater operational flexibility.

DPA recommends that NZ Post retains commercially set, published targets on mail delivery timeframes, particularly to communities where the number of people experiencing digital exclusion is high.

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| **Recommendation 3:** that MBIE requires NZ Post under the revised Deed of Understanding to improve its performance regarding the timely delivery of mail, particularly to communities experiencing high rates of digital exclusion. |

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| **Recommendation 4:** that NZ Post does not remove language around delivery on non-consecutive days. |

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| **Recommendation 5:** that NZ Post retains commercially set, published targets on mail delivery, particularly to communities which experience high rates of digital exclusion. |

This brings us to our next recommendation regarding the geographic classification for post office outlets – in some areas, NZ Post have merged with local dairies, so it is important these sites remain to ensure accessibility for disabled people and other disadvantaged communities.

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| **Recommendation 6:** that all current NZ Post outlets in community locations like dairies remain in place to ensure accessibility for disabled people and other communities. |

**Responses to questions 6 - 10**

**6.) If you were moving to a location that was not currently within NZ Post’s mail network footprint (e.g. not receiving mail delivery), how would you feel about receiving mail at a community collection point, or other means than through a letterbox at your property?**

In principle, DPA supports the idea of creating community collection points for the distribution of post in communities not currently within the mail network footprint.

However, we recommend that direct letterbox delivery is retained for disabled and older people on application to NZ Post stating that they need this service, especially in communities which are not currently in NZ Post’s mail network footprint.

Community collection points may be difficult for disabled and older people to access independently, and this may result in further disadvantage for these groups who are already disadvantaged through not being in a mail footprint area as well.

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| **Recommendation 7:** that direct letter delivery is retained for disabled and older people who apply to NZ Post stating that they need this service, especially in communities not currently in NZ Post’s mail network footprint. |

**7.) Do you typically require assistance when sending mail items (not parcels) at a postal outlet and what type of assistance do you require and/or receive?**

Many disabled people require assistance from staff when accessing postal services.

This means having adequate staff on hand at NZ Post outlets to provide support to people wanting to use services like post office boxes, private bags, counter services and when sending mail or packages.

DPA is concerned about the proposal to reduce employee numbers at NZ Post, which, in turn, will reduce the level of in person support and service available to customers using the remaining outlets.

Any reduction in staffing levels will particularly impact on the ability of disabled people, older people and other disadvantaged communities who need to have in person support when physically accessing NZ Post services.

**8.) Do you believe the existing requirement of at least 240 manned points of presence should be maintained in the revised Deed?**

Yes, this is very important given all that we have stated in this submission.

Any further reductions without a fully developed transition plan would disadvantage disabled people and other communities who still need to access postal services in the short-to-medium term.

**9.) Do you have any feedback on the proposal for the next Review of the Deed to take place by three years from the date of any revised Deed following the 2024 Review?**

Any review must specifically consider the impact of changes on disadvantaged communities including disabled people.

1. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities> [↑](#footnote-ref-2)
2. <https://www.odi.govt.nz/nz-disability-strategy/> [↑](#footnote-ref-3)
3. <https://dns.govt.nz/assets/Digital-government/Digital-inclusion/Digital-Inclusion-Research/Publication-of-Digital-Council-Advice-to-government-Addressing-the-digital-divide-The-economic-case-for-increasing-digital-inclusion.pdf> [↑](#footnote-ref-4)
4. <https://www.digital.govt.nz/dmsdocument/192~summary-of-digital-inclusion-user-insights-disabled-people-report/html> [↑](#footnote-ref-5)
5. <https://www.cab.org.nz/assets/Documents/Face-to-Face-with-Digital-Exclusion-/FINAL_CABNZ-report_Face-to-face-with-Digital-Exclusion.pdf>

 [↑](#footnote-ref-6)