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Convener  
Economy and Fair Work Committee  
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Dear Convener

Thank you for your letter of 14<sup>th</sup> November. I have provided below an update on the policy areas set out in your correspondence along with others mentioned during the evidence session.

### **Universal Postal Service and Small Businesses**

Consumer Scotland has undertaken research to test consumer views on the importance of different aspects of the universal postal service and our final report is published [here](#). Our research found that timeliness and quality of service were the most common reasons for wanting to maintain a six day and weekend delivery service. Specifically, small business owners highlighted the importance of maintaining letter deliveries six-days a week to meet their operational needs to send mail during the weekend.

We are also currently undertaking new research to examine the experience of small businesses across Scotland as consumers, and how this compares to domestic consumers in a number of sectors and markets. We are including issues relating to the universal postal service in this work and will be pleased to share our findings with the Committee when they are available.

### **Impact of Postal Reform**

The Committee noted its interest in our work on the impact of postal reform in Scotland. Our research on low-income postal consumers is currently in the field and we will share these with the Committee.

As mentioned at the Committee, in partnership with Highland Council we recently organised a workshop to gather views on the impact of proposals to reform the Universal Service Obligation (USO) for postal services in rural areas. The key themes that emerged from the discussion were:

- Royal Mail's postal services are highly valued by remote and rural communities and are seen as an essential service and lifeline.
- Postal service cost increases hit vulnerable consumers and community based microbusinesses in rural areas the hardest.
- The impact on small businesses in the Highlands of any changes to the universal service was a particular concern.
- The impact of any changes to the USO will be generally greater for rural and remote consumers and small businesses.
- Postal services need to be assessed and understood in a broader context in remote and rural Scotland, in terms of their importance to communications and logistics infrastructure as well as the social fabric of communities.

### **Smart Metering**

As you are aware, Scotland faces significant challenges in terms of the rollout of smart meters due to the structure of the current communications network and this issue is amplified in rural and remote locations.

A key issue is that neither consumers nor advice agencies have access to smart meter coverage maps, due to commercial sensitivities. Consumer Scotland considers that advice and support could be much better targeted if more was known about where coverage is required most.

With 2G and 3G mobile signals planned to be withdrawn by the end of 2033, the UK Government is working with industry on a long-term replacement. We know a 4G solution, and separate broadband-based technologies, are due to undergo trials shortly and if successful, they will likely become the default technologies for properties that cannot currently connect to the smart meter communications network. Arguably, this places even greater importance on the Scottish Government's R100 superfast broadband rollout project.

Consumer Scotland will continue to work with the UK and Scottish Governments on this important issue.

### **Investigations**

As discussed during the Committee session, we will shortly be concluding our investigation into consumer protection frameworks in the market for low carbon technologies. We would of course welcome any representations from Committee Members on this matter, should they or their constituents have evidence or experience they would like to share.

We will also be happy to share our findings and recommendations with the committee once they are complete.

### **Recall of Goods Register**

Since the Consumer Scotland Act came into force, a UK-wide recall of goods database has been created by the Office for Product Safety and Standards which consumers from across the UK can access. During our recent evidence session we set out how we are taking a considered approach and ensuring value for public sector money by working to promote the existing UK-wide register and its accessibility.

To that end we are prioritising working closely with OPSS to raise awareness of the database and where a good has been recalled by a manufacturer, to ensure that the experience for Scottish consumers is as streamlined as possible. We are also ensuring consumers can access information about recalled goods, and the OPSS database more widely, via our website, and we are currently considering how we can further improve this experience for consumers within the current fiscal constraints facing the public sector.

We are also working with OPSS in shaping a national survey regarding the register and wider product safety that will launch early in 2025. These findings will help identify opportunities for us to work more closely and ensure Scottish consumers' interests are best represented.

### **Communications Strategy**

The Committee expressed an interest in hearing more about Consumer Scotland's communication strategy especially how our work is brought to the attention of consumers, put into the public domain and publicised.

Our reports, briefings and consultation responses are published on our [website](#), shared with the relevant parliamentary committees, lodged with the National Library of Scotland and sent to the Scottish Parliamentary Information Centre and, where matters are reserved, to the House of Commons Library.

All of our major reports are highlighted to the media through the issuing of news releases, which we also publish on our website. We have secured significant coverage on a range of key issues including our investigation launch, issues facing consumers with the EV charging network, water affordability support, the energy price cap and financial support for terminally ill people to help them pay for their energy bills.

As well as through our social media accounts, we publicise major reports by directly emailing stakeholders and operate a News Alert service for the public and stakeholders. In addition to our own publications, our website also includes a range of information for consumers on where to get help including recall of goods and product safety, direct advice bodies, financial advice, business support and ombudsman services.

We have attached our current Communications Plan which provides more detail on our approach to communications. This plan is updated regularly to ensure it reflects our current strategy and priorities.

I hope you find this information helpful and we would be happy to provide further detail on any of the matters above if the committee would find it useful.

Yours sincerely,

David Wilson

# Media & Communications Strategy

**Andrew Denholm**  
Head of Communications

**2024**

# Overview

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Our first communications strategy, published in 2022, set out how we would use communications in the two years following our public launch to establish our identity and build trust in Consumer Scotland as the statutory body for consumers in Scotland with stakeholders, the public and the media.

This updated communications strategy reflects the growth of our organisation and outlines the current and future steps required to maintain and further enhance the reputation of Consumer Scotland as the leading, evidence-led, expert voice on the key issues facing consumers in Scotland.

A key aim of this strategy is to support the objectives of our Strategic Plan 2023-2027. In particular we will maintain a focus on the three cross-cutting consumer challenges which guide all our work: affordability, climate change mitigation and adaptation and consumers in vulnerable circumstances.

Communications output will support our wider policy and advocacy strategy set out in our annual work programmes, helping to contribute to positive change for consumers by extending the reach, impact and visibility of our analysis, research and recommendations. In doing so, our communications will help demonstrate the positive impact on consumers our work is having across the levy-funded areas of energy, post and water and wider consumer markets. A key focus for Consumer Scotland in the upcoming period will also be around the launch of our first investigation.

Communications will also support the objectives of our emerging work on strategic partnerships, supporting existing joint working as well as new and emerging relationships, particularly as we expand our work on the consumer duty and associated guidance.

## Strategic Positioning

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Our strategic positioning is critical in maintaining the identity of Consumer Scotland with our external audiences. It is central to all communications to maintain consistency and trust with stakeholders, the media and the public.

Our positioning messages are:

- Consumer Scotland is the statutory body for consumers in Scotland

- Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament
- Consumer Scotland uses its statutory functions to improve outcomes for current and future consumers
- Consumer Scotland is evidence-led and uses data and analysis to publish expert reports on key issues facing consumers and make recommendations to government, business and the wider public sector on how to tackle them
- In conjunction with our evidence base we seek a consumer perspective through the application of a number of consumer principles including access, choice, safety, information, fairness, representation and redress
- We have three overarching themes that underpin all our work: affordability, climate change mitigation and adaptation and consumers in vulnerable circumstances
- We work in partnership with other organisations with interests and expertise in consumer issues

# Objectives and Strategies

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There are a range of key overarching objectives which underpin our communications work which are accompanied by a series of strategies which we employ to help us deliver against these objectives.

## Communications objectives

- Improve outcomes for consumers by extending the reach and impact of Consumer Scotland's research, analysis and policy recommendations with key decision-makers
- Raise awareness of the key issues of importance to consumers in Scotland
- Increase awareness and understanding of Consumer Scotland and its remit
- Increase Consumer Scotland's influence and demonstrate our positive impact on the lives of consumers across the range of markets we cover
- Strengthen relationships with stakeholders and develop collaborative working to maximise impact
- Raise awareness of where consumers can get access to the information they need
- Raise awareness of the consumer duty and how the relevant public bodies can meet the duty

## Communications strategies

- Generate a wide range of media coverage based on our key findings and recommendations, influencing decision-makers to take action to benefit consumers
- As a result of this media coverage, demonstrate how we help consumers and add value
- Use communications to demonstrate to decision-makers how our work is helping improve outcomes for consumers and benefiting the wider economy
- Grow our social media following to reach the widest possible audience with our key messages in a simple and engaging way
- Drive the public, media and key partners to our website through our communications outputs, including our new News Alert service
- Signpost consumers to appropriate advice both through our social media channels and our website
- Further develop our website to improve the user experience and ensure it demonstrates our growing influence, range of outputs and impact

## Audiences and tone

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Our **audiences** are wide-ranging and include:

- **Consumers** - our work includes ensuring consumers have access to appropriate advice and information through the “Information for consumers” section of our website. It is also important that consumers are aware of the advocacy work we conduct on their behalf
- **Stakeholders** - those actively engaged in the work of Consumer Scotland including regulatory, government and business and consumer bodies as well as a wider range of stakeholders. We need to keep stakeholders informed of our work, but we also want them to use our research and recommendations to take action on behalf of consumers
- **Parliament and government** - we are answerable to the Scottish Parliament through the Economy and Fair Work Committee, but also maintain relationships with other parliamentary committees and the Scottish and UK Governments who provide our funding. In addition to accountability our communications are a mechanism for these bodies to take action on our recommendations
- **Media** - national, local and specialist media including those with a particular interest in consumer affairs across print, broadcast and the web. Developing and maintaining strong relationships with a range of media allows us to highlight issues



of concern to consumers and demonstrate how our key reports and recommendations will make a difference. Media coverage of our work can also leverage positive change for consumers

- **Internal** – Keeping Consumer Scotland colleagues informed of developments across the organisation is critical to foster a common sense of purpose and to join up the work we do across the organisation. One key way of maintaining these vital relationships is through a weekly internal email setting out the key events and outputs from across the organisation, updates from the executive team and other important information

Under our founding legislation the way we communicate must be inclusive. All our communications are therefore written in a straightforward and direct **tone** with clear messaging to maximise understanding of our findings and recommendations and the impact we are having both with the general public and more specialist audiences.

## Our communications

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Consumer Scotland uses a range of different communications techniques and tactics to reach our audiences:

**Stakeholder communications:** We continue to contact our stakeholders directly to inform them of key developments including the publication of the Work Programme and the Consumer Duty guidance and associated consultations. Reaching our core stakeholder audience directly in this way will continue to play a key role in our communications. As we expand our stakeholder engagement through the work of the Assistant Director Strategic Partnerships, our communications will support those relationships. We have also developed a **News Alert Service** which members of the public and stakeholders can sign up to receive immediate alerts for our news, blogs and other outputs. We currently have more than 160 subscribers and will increase this audience.

**Parliamentary liaison:** We liaise directly with the Economy and Fair Work Committee because we are accountable to them. In addition to formal correspondence we also communicate informally with the committee clerks to share information and ensure the committee has access to all relevant reports. Other committees are increasingly interested in our work and we share relevant material with the Net Zero, Energy and Transport Committee and the Rural Affairs and Islands Committee. Both MSPs and Scottish MPs now receive our quarterly **Newsletter** to increase engagement and understanding of our role and work. All our research publications are sent to Spice and the House of Commons Library where relevant and the National Library of Scotland.

**Social media:** Our social media channels are an essential way of engaging with the public and stakeholders. A key strategy to increase engagement and make our social media posts more appealing has been to bring the creation of social media graphics in-house and re-design a suite of graphics using photographs of our staff. Social media videos will continue to

be used to highlight significant milestones or important pieces of work, with recent examples being the publication of the Consumer Duty guidance and the Chief Executive's 2024 annual update. Our social media audiences have built gradually since our launch and we currently have 385 followers on Twitter (X) and 571 followers on LinkedIn. Engagement has significantly increased over time with a total of more than 21,000 views across LinkedIn and X between January and May this year compared to 15,000 for the same period in 2023.

**Website:** The Consumer Scotland website is one of our primary methods of communication. In recent months the website has been redesigned to give more prominence to the Information for Consumers section and to create a new section for the consumer duty guidance. We have also introduced a new "Our Work" section to ensure users can easily access the areas of work they are most interested with clear links to all the relevant blogs, news items, reports and consultation responses. Future development work includes a new section provisionally entitled "Our Partnerships" to showcase our collaborative work across the consumer landscape in Scotland. Everything we publish on the website must be accessible to ensure we are not disadvantaging people with disabilities and this will continue to be an absolute priority. While we have not set specific targets for our website we have seen steady and significant growth. Between January and May in 2024 we recorded a total of 27,000 website page views compared to 18,000 for the same period the previous year.

**Mainstream Media:** A significant area of expansion since our launch has been growing coverage in the mainstream media. Our initial strategy was to raise our profile gradually to ensure we did not create artificial expectations of what we could deliver. The increase in published reports on key issues across the markets we work in has allowed us to approach the mainstream media with greater frequency to set out our key findings and recommendations. We have used different techniques to secure coverage including the use of exclusives to maximise coverage. Examples of this approach include a front page article in The Herald on digital landlines, coverage in the Sun on the implications of the collapse of McClure's legal firm and a full page article in The Scotsman on research on water resources and climate change. At other times we have issued news releases to all media. An important example of this more general approach includes regular statements from the Chief Executive on the price cap to create an expectation that there are key topics where Consumer Scotland is the expert voice and will always provide comment. A notable indication of growing awareness of our capacity to provide expert comment on specific issues included a full day of BBC Scotland television and radio coverage on the impact of the price cap with the Head of Energy. We will further grow and develop this work.

**Reactive lines:** With a growing media profile we have seen a corresponding increase in the number of journalists approaching us for information or comment on key issues. This includes some queries related directly to our publications or core areas of work, but also more general consumer issues. We keep the need for reactive lines on key issues under constant review with policy teams, but have also developed a strategy and sign-off process to assess requests for information from media which are not obviously related to our core work to establish whether or not we should respond. While we want to encourage more media attention on our work it is still important for us to be very clear what issues we feel are appropriate for us to comment on and when.

**Blog posts:** We continue to use blog posts as an important way to reach key audiences. Our blog posts are sometimes used to provide insight into in-depth topics such as inflation at key

moments in the year, but also provide a way of reaching new audiences for important issues such as access to cash for rural communities in a way that is readily understandable to the general public.

**Partnership working:** Collaboration is at the core of our communications work. We have developed strong links with teams from a range of key stakeholders including Trading Standards Scotland, Citizens Advice Scotland, Advice Direct Scotland and Ofgem. This has allowed us to work collaboratively both on formal national campaigns such as Worried This Winter and Shut Out Scammers and joint projects involving the Advisory Committee on Consumers in Vulnerable Circumstances, the SEIC report and the Consumer Network for Scotland. These relationships also allow us to cross promote social media posts where mutually advantageous.

## Next steps

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Consumer Scotland has made considerable progress since its launch in 2022 with colleagues across the organisation working collectively to develop a consistency of tone, an authority of voice and a clarity of purpose for the new organisation.

There is much still to deliver in Consumer Scotland's remit including work on the recall of goods, the launch of our first investigation, the development and roll-out of the Consumer Duty guidance and the development of our role as the statutory advocate for heat network consumers. As we continue to expand our influence Consumer Scotland must continually demonstrate how we are improving the lives of consumers in the face of key challenges facing our society including climate change, affordability and consumers in vulnerable circumstances.

However, the most significant difference between now and when we launched is the increasingly strong evidence base and clear published recommendations we now have across the breadth of markets in which we work. That growing body of work from policy and research and analysis colleagues enables Consumer Scotland, through its communications, to speak with increasing confidence on the issues that matter to consumers and demonstrate the impact we are having in contributing to positive change for consumers in Scotland.