

Future management of the PAF

Response to Postcomm Consultation document – February 2006

Local Authority Local Land and Property Gazetteer Custodians and Street Naming and Numbering Officers in England and Wales response – compiled on their behalf by the Local Government Information House

The Local Government Information House (LGIH) is working with local authorities to modernise their services. As a wholly-owned subsidiary of the Improvement and Development Agency (IDeA), it works in partnership with the local authority community, developing national infrastructure projects that enable Local Authorities (LAs) to deliver local services more effectively. These include:

- [National Land and Property Gazetteer \(NLPG\)](#)
- [National Street Gazetteer \(NSG\)](#)
- [Mapping Services Agreement](#)

Creating the appropriate networks for people is an important aspect of joining up local government. As an intermediary between the public and the private sector, the LGIH is in a position to negotiate with private companies on behalf of local authorities. Against this background and having consulted with all Authorities' Local Land and Property Gazetteer (LLPG) Custodians and Street Naming and Numbering Officers (SNN) in England and Wales, the LGIH has compiled, on behalf of the LLPG Custodians, the following response to Postcomm's proposals for the future management of the PAF, a consultation document (NB IDeA intends to respond to the consultation separately)::

1. Executive summary

S.5 We agree with Postcomm's proposals and would like to add:

- Our support for the creation of a separate, clearly ring-fenced business unit that will be solely responsible for all aspects associated with the management, development, maintenance and distribution of PAF and related products on the same commercial terms to both Royal Mail's (RM's) internal and external customers.
- Our support for the appropriate licensing framework that will recognise local authorities (LAs) contribution in any onward licensing arrangements to third parties.
- Our endorsement of the proposal that Royal Mail should introduce objective and fair contractual arrangements with LAs to secure key information sources. We believe that around 98% of LAs provide key information for PAF updates and this needs to be regularised by formal contractual arrangements with all LAs.
- We support the need to design a flexible and responsive licensing framework to assist LAs to promote the use of PAF and encourage good addressing.
- We request that LAs through LGIH have representation on any Advisory Board to 'inject' market requirements into Royal Mail through direct access to the Royal Mail business unit decision maker and also to Postcomm.

- S.6** We agree and encourage the timescales for the execution of the proposals. LGIH on the behalf of LAs has started dialogue with Royal Mail on a number of items proposed within the consultation document and would support their implementation within the timescales indicated in the consultation document. The commercial arrangements surrounding some of these issues are extremely complex. Full implementation within the timescales indicated will need a cooperative approach from RM, and from other interested parties. LGIH would welcome the opportunity to keep Postcomm apprised of the progress of these developments and the context in which they are being negotiated.
- S.10** We support the concept that should Royal Mail not adhere to the approach outlined in this consultation then Postcomm will seek alternative options to provide a comparable service.

2. The importance of PAF

Conclusion

- 2.18 – 2.20** We agree with Postcomm's proposals and confirm that PAF is vital to the following key areas of LAs activities:
- Bulk mail distribution (council tax bills, electoral registration and postal voting, statutory planning consultations, etc).
 - Electronic consultation and service delivery to citizens.
 - Demographic profiling and analysis.

3. The legal framework

Condition 20: Access to the Postcode Address File

- 3.8** We support greater emphasis being given to PAF being used in such a way as to encourage good addressing within LAs activities and that Royal Mail impose no terms or conditions other than reasonable restrictions to ensure such good addressing practices.

4. Observations on Royal Mail's performance

Maintenance

See comments in Chapter 9, Maintenance, quality and development

5. Financing

See comments in Chapter 8, Licensing

6. Competition Issues

Proposals

- 6.33** We agree with Postcomm's proposals

7. Transparency and accountability

Proposals

- 7.24** We agree with Postcomm's proposals and would like to add:
- We request that LAs through LGIH have membership on the proposed PAF Advisory Board in addition to Government (Annex D of the consultation)

8. Licensing

Proposals

- 8.23** We agree with Postcomm's proposals and would like to add:

- Any licensing regime should be non-discriminatory and that it may be appropriate in some circumstances to distinguish between PAF users. Under the Government's modernisation agenda LAs promote and encourage good addressing to provide non-commercial service delivery to its citizens. This includes innovative new uses in web-based services which reduce the overall cost of administration. The terms of any licensing arrangements to LAs for PAF should not seek to generate additional income from such improvements in service delivery but be designed to maximise PAF usage and encourage good addressing.

9.0 Maintenance, quality and development

PAF accuracy and updates

9.5- 9.11 The importance of LAs contribution to the maintenance, quality and development of PAF cannot be overstated. LAs are the statutory street naming and numbering authority for the UK and are, therefore, an irreplaceable source of new address data for PAF provided in advance of the new addresses being inhabited. A recent survey undertaken by LGIH indicated that around 98% of LAs send address change information to Royal Mail's Address Management Unit. However, the lack of formal arrangements or standardised procedures for information supply represents a quality and continuity risk to PAF that is unacceptable. Accuracy/update issues identified in this section of the consultation such as business addresses, multi-residency addresses and not yet built properties can be improved with closer cooperation with LAs. We wish to work with RM to resolve these issues, but, as we have pointed out earlier are aware of the complex dependencies which may make such resolution difficult to achieve. We agree with Postcomm's recognition of importance of the interface with key contributors to the update of PAF in sections **9.12 - 9.22**.

PAF development

9.25, 9.27, 9.28 We agree with Postcomm's proposals and would like to add:

- Whether through an Advisory Board or other process Royal Mail should implement an agreed process for LAs to make valid contributions to decisions on development and innovation of PAF. LAs address knowledge through their SNN functions and understanding of their citizens' address needs should not be underestimated and should be reinforced through a closer working arrangement between Royal Mail and LAs.

9.26 We agree with Postcomm's proposals and support the linkage of PAF to local authority unique property reference numbers (UPRN).

9.29 We agree with Postcomm's proposals and would like to reiterate that LAs have representation on any Advisory Board to 'inject' market requirements into Royal Mail through direct access to the Royal Mail business unit decision maker and also to Postcomm.

9.30 We agree with Postcomm's proposals and would like to add:

- The introduction of formal supply conditions through contractual arrangements with LAs should be implemented as a matter of priority. LGIH on the behalf of all LAs has started dialogue with Royal Mail with a view to standardising information supply to include performance measures and incentives/penalties. To date these discussions have proven productive with respect to the technical matters, unfortunately licensing issues are

impeding progress. We would like Postcomm to monitor and encourage Royal Mail to conclude such an agreement within the timescale identified in the Executive Summary (S.6) of the consultation document.

10. Ownership

We agree with Postcomm's conclusion to this section and would like to add:

10.18 Should any future change in ownership be considered then LAs through LGIH would be keen to represent the interests of local authorities as key stakeholders in addressing.

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