



3rd April 2024

Dear Ofcom

The Future of the Universal postal service

The Institute of Biomedical Science (IBMS) submits this formal response to the consultation on the future of the universal postal service.

The IBMS represents the interests of biomedical science professionals in the UK and internationally. IBMS Company Members include multi-national diagnostics companies and national institutions.

The majority of IBMS members work in healthcare laboratories. They also work in government agencies, the commercial and industrial biomedical science sectors, research and development, and academia. Biomedical scientists contribute extensively to health and care in the UK, working to identify, research, monitor and treat diseases across the broadest areas of modern science, focusing on the complexity of the human body.

Our 20,000 IBMS members, employed mainly in NHS pathology laboratories, play a fundamental role in the diagnosis and treatment of disease across the UK.

There are a number of critical healthcare activities that rely upon a rapid, daily collection and delivery system to ensure patients receive the diagnosis and treatment they require. An example of this is the NHS newborn bloodspot programme, that collects a blood spot card from every baby born in the UK (700,000 per year) and allows for the diagnosis of rare but treatable disorders, any changes to a USO could lead to delays in reaching a diagnosis and could have direct harm on babies if diagnosis is delayed. Samples are collected in the home and posted to regional laboratories and timeliness is critical.

Another area is sexual health testing. Home sampling has been shown to increase uptake of sexual health testing leading to more people being aware of their sexual health status reducing transmission of sexually transmitted diseases. Most sexual health testing services provide for a postal return service using the Royal Mail network of post boxes throughout the country. Any delays in processing of samples can reduce the quality of the testing result and also lead to a longer time to diagnosis which can impact upon treatment, and transmission rates.

Innovation in NHS healthcare delivery will see more testing take place in the community, community diagnostic centres, virtual wards and at home. This will increase reliance on the USO for transporting diagnostic samples from patient's homes to networked laboratories. The current postal system is well placed to make this an effective strategy.

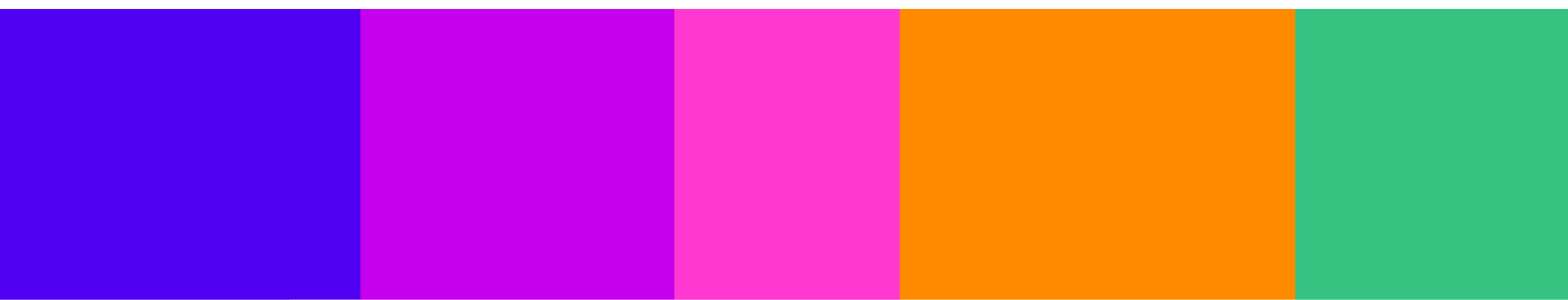
It is our position that any reduction in the collection and delivery schedules must be thoroughly assessed to ensure that public health is not impacted and that the National Health Services of the UK can continue to provide effective strategies to maintain the health of that nation.

Yours sincerely

David Wells MSc FIBMS CSci Hon DSc FRCPath (Hon) FAHCS (Hon)
Chief Executive

Your response

Question	Your response
<p>Question 1: Do you agree that we have identified the correct aims, supporting principles and features of the USO? Do you consider that these should continue to be respected as far as possible when assessing potential changes to the USO?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 2: Do you agree with our assessment of the direction of change in postal needs of residential (including vulnerable) users and SMEs? Are there other factors relevant to their future demand which we have not considered?</p>	<p>Confidential? – N</p> <p>Changes in the way the public access healthcare and use of the postal system to return diagnostic samples to a testing laboratory when the test is taken in the home. For example for sexual health testing and newborn screening, but other conditions that vulnerable members of the public would be disadvantaged by.</p> <p>Technological innovation will see more testing conducted in the home to support NHS patient care.</p>
<p>Question 3: Do you agree with our assessment of the bulk mail market? Are there other factors relevant to its future evolution which we have not considered?</p>	<p>Confidential? – N</p>
<p>Question 4: Are there specific events/changes that could trigger a significant change in demand for large mail users, including public services?</p>	<p>Confidential? – N</p>
<p>Question 5: Do you agree with our proposed approach to estimating the financial burden of the USO?</p>	<p>Confidential? – N</p>



Question	Your response
<p>Question 6: Do you agree with our considerations regarding the unfairness of the financial burden of the USO?</p>	<p>Confidential? – N</p>
<p>Question 7: Do you agree with our considerations regarding the impact of the financial burden of the USO?</p>	<p>Confidential? – N</p>
<p>Question 8: Do you agree with our analysis of the different options available to change the USO and the impact of those changes on residential (including vulnerable) users, SMEs and bulk mail users? If not, please explain why and set out any option(s) which we have not considered.</p>	<p>Confidential? – N</p>
<p>Question 9: Which option(s) do you consider would be most appropriate to address the challenges we have identified, while also ensuring that users' needs are adequately met?</p>	<p>Confidential? – N</p>
<p>Question 10: Do you have any other views about how the USO should evolve to meet users' needs?</p>	<p>Confidential? – N</p> <p>Yes, see attached letter.</p>