Item: 5

Development and Infrastructure Committee: 9 September 2025. URKNEY

Strategic Priorities for Telecommunications, Spectrum and Postal

Services - Consultation.

Report by Director of Enterprise and Resources.

1. Overview

- 1.1. The UK Government is consulting on its draft Statement of Strategic Priorities for Telecommunications, Spectrum and Postal Services, with responses due by 18 September 2025. The consultation document can be found here.
- 1.2. The consultation sets out strategic priorities across five key areas:
 - Fixed and mobile digital infrastructure.
 - Management of radio spectrum.
 - Telecoms consumers.
 - Telecoms security and resilience.
 - Postal services.
- 1.3. Appendix 1 details the consultation questions and the officer responses to these from a Council viewpoint.

2. Recommendations

- 2.1. It is recommended that members of the Committee:
 - Approve the draft response to consultation on Strategic Priorities for Telecommunications, Spectrum and Postal Services, attached as Appendix 1 to this report.
 - ii. Authorise the Director of Enterprise and Resources to submit the response in relation to the consultation on Strategic Priorities for Telecommunications, Spectrum and Postal Services to the Department of Science, Innovation and Technology at the UK Government by the deadline of 18 September 2025.
 - iii. Note that, due to the timescale constraints involved, the Chief Executive will be requested to exercise emergency powers to authorise submission of the response, referred to above, prior to approval by the Council.

3. Broadband Connectivity (Question 1)

- 3.1. Broadband connectivity in Orkney is increasingly essential—not only for economic development but for public safety and wellbeing. As the national migration away from the Public Switched Telephone Network (PSTN) progresses toward its completion in January 2027, reliable broadband will become critical for accessing emergency services, telecare, and other support systems.
- 3.2. The recent damage to the Shefa-2 subsea cable, which disrupted services for 14 days, exposed the fragility of Orkney's digital infrastructure. Hundreds of homes and businesses, including NHS Orkney, were affected. This incident highlights the urgent need for resilient and redundant connectivity, especially in geographically isolated communities.
- 3.3. The Council's draft response to the consultation supports the UK Government's strategic priorities but calls for:
 - Rural-first investment models to address commercial rollout challenges.
 - Modernisation of the Broadband Universal Service Obligation (USO) to reflect current technological and geographic realities.
 - Regulatory safeguards to prevent anti-competitive practices.
 - Transparency in infrastructure sharing, particularly access to Openreach's ducts and poles.
 - Coordination with energy sector transitions, such as RTS meter replacement.
- 3.4. These recommendations reflect the reality that Orkney's full-fibre availability stands at just 29%, with 21% of rural premises falling below the USO threshold. Without robust connectivity, Orkney risks being excluded from the very benefits it is expected to help deliver as part of the UK's renewable energy transition.

4. Mobile Phone Coverage (Question 2)

- 4.1. Mobile coverage in Orkney is essential for public safety, energy infrastructure, and economic participation. While Ofcom's Spring 2025 Connected Nations report indicates 99% 4G geographic coverage, this figure is far from the lived experience of residents and businesses. Significant areas still suffer from poor or no signal, particularly in rural and ferry-linked locations.
- 4.2. A study commissioned by Orkney Islands Council with Farrpoint revealed:
 - Signal variation across Kirkwall and Stromness
 - Discrepancies between operator maps and real-world coverage
 - Persistent gaps in service from some providers

- These gaps are not merely inconvenient—they exacerbate digital exclusion and create barriers to essential services. The withdrawal of the Radio Teleswitch Service (RTS) has made mobile connectivity even more critical. Without reliable signal:
- Residents cannot install smart meters.
- Households lose access to cheaper off-peak tariffs.
- Electric vehicle charging and energy management are compromised.
- 4.3. This situation illustrates a stark contradiction: Orkney is positioned as a launchpad for Net Zero, yet lacks the digital infrastructure to support that ambition. Improved mobile coverage is urgently needed to enable a just and inclusive energy transition.

5. Postal Services (Question 6)

- 5.1. Postal services remain a vital lifeline for communities across Orkney. In remote and island areas, they ensure access to essential services including banking, government correspondence, prescription delivery, and parcel logistics. For residents without reliable digital connectivity or transport, the local post office often serves as a primary point of contact with wider public and commercial services.
- 5.2. The retention of the Kirkwall Post Office at its current location provides welcome stability, but concerns remain about future accessibility under a franchised model. Vulnerable residents—particularly older people and those without private transport—could be disproportionately affected by any relocation.
- 5.3. Operational challenges include:
 - Delivery disruptions in Harray, Evie, and Finstown
 - NHS Orkney concerns about delayed medical communications
 - Calls for formal safeguards to protect island communities
- 5.4. The Council's consultation response calls for:
 - Monitoring and enforcing service reliability standards
 - Addressing affordability and surcharges
 - Ensuring contingency planning and resilience
 - Including bulk and access mail standards within regulatory oversight
 - Enhanced collaboration between Ofcom, Royal Mail, and local authorities

Radio Teleswitching Service (RTS) withdrawal (Questions 1, 2 and 3)

- 6.1. The withdrawal of RTS is not merely a technical transition—it has far-reaching social and environmental consequences. Orkney has one of the highest proportions of RTS meters per capita, and many households now face the risk of losing heating and hot water or being moved to more expensive tariffs due to delays in meter replacement.
- 6.2. Fuel poverty in Orkney remains significantly higher than both the Scottish and UK averages:
 - 31% of households affected
 - 22% considered to be in extreme fuel poverty
- 6.3. The transition has been poorly co-ordinated, with limited engineering capacity and low smart meter rollout in rural areas. In areas with poor mobile signal, suppliers have refused installations or fitted meters remain non-operational. Without reliable connectivity, residents may lose access to cheaper tariffs and face limitations in managing energy use.
- 6.4. The Council's consultation response calls for:
 - Impact assessments for legacy service retirements
 - Support for transitional technologies
 - Place-based spectrum access to support rural innovation
 - Spectrum planning that includes emergency and public services
- 6.5. Without urgent action, vulnerable households may be left behind in the energy transition, undermining climate goals and deepening the cost-of-living crisis.

For Further Information please contact:

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Implications of Report

- **1. Financial -** There are no immediate financial implications arising directly from the recommendations to this report.
- **2. Legal -** There are no immediate legal implications arising directly from the recommendations to this report.
- 3. Corporate Governance Not applicable.
- **4. Human Resources -** Not applicable.

- **5. Equalities -** Not applicable.
- **6. Island Communities Impact -** Not applicable.
- 7. Links to Council Plan: The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:
 Growing our economy.
 Strengthening our Communities.
 Developing our Infrastructure.
 - ☐ Transforming our Council.
- **8. Links to Local Outcomes Improvement Plan:** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Local Outcomes Improvement Plan priorities:

□Cost of Living.
\square Sustainable Development.
⊠Local Equality.
☐ Improving Population Health.

- 9. Environmental and Climate Risk Not applicable.
- **10. Risk -** Not applicable.
- **11. Procurement -** Not applicable.
- 12. Health and Safety Not applicable.
- 13. Property and Assets Not applicable.
- **14. Information Technology** Not applicable.
- **15. Cost of Living -** Not applicable.

List of Background Papers

<u>Proposed Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services</u>

<u>Orkney Islands Council, Policy, and Resources Committee: 19 September 2023 – Digital Strategy Delivery Plan</u>

Policy and Resources Committee: 30 November: 2023 – Project Gigabit Procurement

<u>Orkney Islands Council Asset Management Sub-committee: 28 January 2025 - Information Technology and Cyber Security Strategy</u>

Appendix

Appendix 1 – Council's draft response to consultation on "Strategic Priorities for Telecommunications, Spectrum and Postal Services".

Appendix 1.

Proposed Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services consultation – closes 18 September 2025.

This appendix sets out the questions asked through the consultation and draft responses to each. Responses to the questions must be submitted via an online portal.

1. <u>Do you agree with the Government's strategic priorities and desired policy outcomes</u> for fixed digital infrastructure? Are there alternative or additional strategic priorities and desired outcomes you believe are required?

Telecommunications infrastructure in Orkney is not just a matter of convenience — it is a matter of survival and opportunity. For our island communities, reliable digital connectivity underpins access to emergency services, telecare, energy systems, and crisis communications. When these systems fail, the consequences can be life-threatening. At the same time, Orkney is expected to be at the forefront of the UK's renewable energy transition. From pioneering marine energy to supporting smart grid innovation, our islands are a testbed for technologies that will shape the future of net zero. But without robust, resilient, and affordable connectivity, residents and businesses cannot fully participate in — or benefit from — this transformation.

Broadband connectivity in Orkney is increasingly a matter of life and limb. As the national migration away from the Public Switched Telephone Network (PSTN) progresses toward its completion in January 2027, reliable broadband will become essential for accessing emergency services, telecare, and other critical systems. In island communities, where alternative communications are limited, any disruption to digital infrastructure can have serious, even life-threatening consequences. Ensuring robust, resilient, and affordable broadband is therefore not only a technical priority — it is a public safety imperative.

Orkney Islands Council broadly supports the Government's strategic priorities for fixed digital infrastructure, including the ambition to extend gigabit-capable connectivity to 99% of UK premises by 2032 and the emphasis on investment, competition, and infrastructure sharing. These priorities are essential to supporting economic growth, public service transformation, and digital inclusion.

However, the Council believes that additional strategic focus is required to ensure equitable outcomes for rural and island communities, where commercial rollout is often

unviable and infrastructure costs are disproportionately high. In Orkney, full-fibre availability remains significantly below the national average, and many premises still fall below the Universal Service Obligation threshold.

The Reaching 100% (R100) programme, led by the Scottish Government, has made important progress in delivering full fibre to over 2,900 premises across Orkney, including both mainland and ferry-linked isles. However, delivery has not reached all residents, and those missed by R100 remain dependent on the UK Government's Project Gigabit, which is still in procurement. The Council urges Ofcom and the Government to:

- Prioritise rural-first investment models, including targeted funding and delivery mechanisms for non-commercial areas.
- Maintain regulatory safeguards to protect emerging competition and prevent anticompetitive practices, especially in areas served by a single provider.
- Ensure transparency and fairness in infrastructure sharing, including access to Openreach's ducts and poles, and clarity in pricing models so they do not impact on potential solutions for Very Hard to Reach Premises (VHTR).
- Review and modernise the Broadband Universal Service Obligation to reflect current technological standards and geographic realities.
- Support business connectivity in rural areas, recognising its role in sustaining local economies and enabling innovation.
- Coordinate infrastructure upgrades with energy sector transitions (e.g. RTS meter replacement) to ensure no household is left behind due to lack of connectivity.

The Council is also concerned about the implications of the Public Switched Telephone Network (PSTN) switch-off, scheduled for completion by the beginning of 2027. This transition affects thousands of residents and businesses in Orkney, many of whom rely on copper-based services for telephony, alarms, and telecare. The Council urges Ofcom to work closely with providers to ensure that vulnerable consumers are protected, that alternative services are available and reliable, and that the transition does not exacerbate digital exclusion in rural areas.

Finally, Orkney Islands Council supports measures to improve gigabit uptake, including better switching processes, consistent terminology across providers, and proactive engagement with communities. These steps are vital to ensuring that infrastructure investment translates into meaningful improvements in service quality and digital participation.

2. <u>Do you agree with the Government's strategic priorities and desired policy outcomes</u> for wireless (mobile) digital infrastructure? Are there alternative or additional strategic priorities and desired outcomes you believe are required?

Orkney Islands Council broadly agrees with the Government's strategic priorities for wireless digital infrastructure, particularly the ambition to deliver high-quality standalone 5G in all populated areas by 2030 and the emphasis on investment, competition, and regulatory stability. These priorities are essential to enabling innovation, improving public services, and supporting economic growth across the UK.

The Council believes that additional strategic focus is required to ensure that rural and island communities are not left behind in the transition to advanced mobile networks. In Orkney, Ofcom data shows that while 4G coverage (from at least one operator) is strong at 99%, 5G coverage remains minimal, with only 13% of rural areas having geographic 5G and just 8% of premises receiving indoor 5G.

Despite intervention programmes such as the Shared Rural Network (SRN) and the Scottish Government S4GI programme, coverage issues and gaps remain. This is evidenced by a <u>mobile coverage mapping exercise commissioned by Orkney Islands</u>

<u>Council in 2024</u> and conducted by Farrpoint. Commercial investment alone will not deliver equitable outcomes in areas with low population density and challenging geography. The lack of robust and resilient mobile phone coverage in Orkney is creating significant barriers to essential energy infrastructure upgrades.

As the Radio Teleswitch Service (RTS) is phased out, many residents are being told they cannot receive a signal strong enough to support smart meter functionality — a prerequisite for accessing modern tariffs and automated energy management. This issue is particularly acute in areas with poor mobile signal, where suppliers have refused installations or where fitted meters remain non-operational. Without smart meters, households risk losing access to cheaper off-peak tariffs and face limitations in managing energy use, including charging electric vehicles, which increasingly rely on mobile connectivity for activation and payment.

The situation underscores the urgent need for improved mobile coverage to support Orkney's transition to smarter, more sustainable energy systems.

We urge the Government to accelerate rural mobile coverage improvements, support small cell and alternative technologies, and ensure mobile infrastructure planning aligns with cross-sector digital transitions, including energy and public service delivery.

To address this, Orkney Islands Council recommends the following additional priorities:

- Rural-first deployment incentives: Ofcom should work with government to develop targeted incentives for mobile network operators to deploy standalone 5G in remote and island communities, including through neutral host models and infrastructure sharing.
- Improved coverage reporting: Ofcom's mobile coverage data should include ward-level granularity, drive-test results, and real-world performance metrics, particularly for transport corridors and ferry-linked isles.
- Local authority collaboration: Ofcom should actively engage with local authorities to gather accurate data and support planning for mobile infrastructure, including identifying priority areas for investment.
- Spectrum access for community networks: Ofcom should explore flexible licensing models that enable community-led wireless solutions in areas underserved by commercial operators.
- Monitoring affordability and competition: In areas with limited provider choice,
 Ofcom should monitor pricing and service quality to ensure consumers are not disadvantaged by lack of competition.
- The Council also supports continued work on net neutrality, ensuring that innovation is not stifled while maintaining consumer protections. Orkney Islands Council welcomes Ofcom's efforts to support widespread 5G adoption and encourages regular reporting on investment levels, regulatory impacts, and progress toward national coverage goals.
- 3. <u>Do you agree with the Government's strategic priorities and desired policy outcomes</u> for the management of radio spectrum? Are there alternative or additional strategic priorities and desired outcomes you believe are required?

Orkney Islands Council broadly agrees with the Government's strategic priorities and desired policy outcomes for the management of radio spectrum, particularly the emphasis on innovation, efficiency, and resilience. However, the Council believes that additional focus is needed on place-based spectrum access to support rural and island innovation. In areas like Orkney, geographic isolation and limited commercial incentives mean that traditional spectrum allocation models often fall short. The Council supports further development of shared access licensing, including full automation to reduce barriers for community networks and local service providers. It also encourages Ofcom to explore pilot zones for rural spectrum innovation, aligned with Scotland's Digital Strategy.

Fuel poverty in Orkney remains significantly higher than both the Scottish and UK averages, with around 31% of households affected and a further 22% considered to be in

extreme fuel poverty. This is driven by a combination of factors including older, energy-inefficient housing stock, reliance on expensive heating fuels due to limited access to the gas grid, and a harsher climate that increases energy demand. Lower average incomes and higher living costs—estimated to be 20–30% above mainland levels—further exacerbate the issue.

The RTS switch-off, which involves retiring longwave radio signals used for energy meter control, demonstrates the need for strategic oversight of legacy spectrum-dependent services. In rural and island areas, RTS has provided a resilient, low-bandwidth solution that worked independently of mobile or broadband infrastructure. Its withdrawal without adequate replacement planning risks service disruption and consumer exclusion. We recommend that spectrum policy include impact assessments for legacy service retirements, support for transitional technologies, and coordination with infrastructure and consumer protection bodies to ensure spectrum decisions do not inadvertently disadvantage remote communities.

The Council urges Ofcom to ensure that emergency services, transport, and utility sectors in island communities are fully considered in spectrum planning, and that public sector users—particularly in health and local government—have reliable access to spectrum for critical services. Finally, Orkney supports stronger UK representation in international spectrum negotiations to ensure rural and island needs are reflected in global frameworks.

The same mobile networks that support telehealth and emergency alerts are also essential for smart meter data transmission, remote monitoring of renewable assets, and digital participation in energy markets. Gaps in coverage and affordability risk excluding our communities from both basic services and future opportunities. Strategic priorities must reflect this dual reality: that in places like Orkney, telecommunications are both a lifeline and a launchpad. Investment, regulation, and resilience planning must be tailored to the unique risks and opportunities faced by rural and island communities.

4. <u>Do you agree with the Government's strategic priorities and desired policy outcomes</u> for consumers? Are there alternative or additional strategic priorities and desired outcomes you believe are required?

Orkney Islands Council welcomes the Government's strategic priorities for Ofcom and broadly supports the direction outlined. The focus on consumer protection, digital inclusion, affordability, and support for vulnerable groups is commendable. However, we believe that additional strategic priorities and refinements are necessary to ensure these policies are effective and equitable for remote and island communities such as ours.

Orkney Islands Council supports the Government's strategic priorities but urges Ofcom to place greater emphasis on the distinct challenges faced by rural and island communities. Persistent mobile coverage gaps, limited provider choice, and excess construction charges—often exceeding £3,000—create affordability barriers and digital exclusion. We recommend capping these charges, mandating minimum service standards for rural areas, and funding targeted digital inclusion programmes, including device access and digital skills. Ofcom should also adopt a more granular approach to affordability monitoring, ensuring automatic compensation schemes are accessible to island residents during outages and evaluating the impact of market consolidation on rural pricing.

We further encourage Ofcom to support local innovation through regulation that enables trials of emerging technologies such as AI, robotics, and LoRaWAN. Consumer engagement must be strengthened by involving rural councils and communities in shaping feedback mechanisms. Vulnerable consumers in Orkney—particularly older residents affected by PSTN migration and those facing digital poverty—require consistent support across the sector. Ofcom should collaborate with local authorities to share data and best practices, ensuring these groups are accurately identified and supported. A place-based approach is essential to ensure equitable outcomes across the UK's diverse geographies.

Consumers in Orkney are increasingly caught in a stark dichotomy between systemic barriers and strategic opportunity. On one hand, residents face excessive construction charges for broadband installation, inflated delivery costs, and persistent market failure in telecommunications — all of which limit access to essential digital services. On the other hand, Orkney is positioned as a key site for major national investment, including the renewable energy transition and the development of Scapa Deep Water Quay. These initiatives demand a robust and resilient digital connectivity backbone to support innovation, logistics, and community participation. Without urgent action to address infrastructure gaps, Orkney risks being excluded from the very benefits it is expected to help deliver.

5. <u>Do you agree with the Government's strategic priorities and desired policy outcomes</u> for telecoms security and resilience? Are there alternative or additional strategic priorities and desired outcomes you believe are required?

The Strategic Priorities rightly prioritise network resilience and security, including cyber threats, physical infrastructure risks, and emergency preparedness.

For rural and island areas such as Orkney, these issues are amplified by geographic isolation and exposure to extreme weather.

Risks to telecoms security and resilience in Orkney:

- Single points of failure in backhaul infrastructure this was seen in July 2025 after
 the Shefa-2 fibre optic submarine cable that links the Faroe Islands, Shetland and
 Orkney to Scotland (operated by Faroese Telecom) was damaged by a fishing
 vessel. There is also a risk posed to subsea telecoms infrastructure from sabotage
 or disruption from hostile actors, cyberattacks, and natural disasters. The UK's
 reliance on these cables, with 99% of digital communications passing through
 them, makes such infrastructure particularly vulnerable.
- Limited emergency coverage and roaming options.
- Vulnerability to power outages and weather-related disruptions.
- During recent damage to the Shefa-2 subsea cable, residents and businesses in Orkney lost telephone services as a result of switching to digital services. For example, BT's Digital Voice.

Impact of Shefa-2 Subsea Cable Damage – Case Studies from Orkney Islands Council Survey

To strengthen the evidence base for our recommendations on telecoms resilience, Orkney Islands Council is collecting anonymised case studies from residents and businesses affected by the July 2025 Shefa-2 subsea cable damage. Below are extracts from some of the responses left by residents and businesses.

These case studies will illustrate the real-world consequences of prolonged digital outages, including:

- Disruption to business operations and financial losses.
- Inability to access emergency services or health care.
- Isolation of vulnerable individuals reliant on digital telephony.
- Increased costs due to lack of alternative connectivity options.
- Lack of easily accessible contigency plans and communications from telecoms providers.

Household Case Studies (Anonymised):

 "In an area with no mobile signal coverage at all and a member of the family recently out of Aberdeen Royal infirmary after major surgery. The last 12 days with no landline or Internet have been stressful. We have been totally reliant on neighbours to use the phone and Stromness library for access to the Internet".

- "Our mobile signal (with another provider) is poor in our house so if we needed to contact emergency services we would not have been able to during the outage as we are with Vodafone, this is not good enough as it is unsafe, relying on Internet home phone with no landline option available".
- "My elderly mother has been without any form of contact we live out in the country and this has been very isolating for her. When we contacted Vodafone about the outage they didn't seem to have a clue and gave no indication of when it would be fixed. We still have no service."

Business Case Studies (Anonymised):

- "Communication on timing for the fix (from the provider) was very limited. As an
 online business this meant that we had to relocate the office for a number of days
 in order to get a internet connection. This was entirely unsatisfactory and a massive
 impact on normal operations for the business."
- "We operate from four locations and none have a mobile s signal that can be relied upon as a back up for internet access. Many Govt bodies insist on online access with no alternative. Clearly never thought that internet would be so extended in time. Need to rethink what contingency plans are. There should be a legal requirement on the statutory bodies eg HMRC pensions etc to provide alternative access in cases of extended outage".
- "Our business has been seriously impacted, made worse by the fact that 4G is extremely poor on our farm".

As a local authority we would urge the Government to take the following steps to improve our telecoms security and resilience;

- Invest in backup infrastructure, including satellite and mobile redundancy.
- Enable emergency roaming protocols for isolated communities.
- Explore new technologies to monitor subsea infrastructure to enhance resilience, speed of response to damage and detection of vessels etc. that damage infrastructure.
- Stronger enforcement and warning regime to encourage fishing vessels to avoid operating directly over known cable routes and to keep their Automatic

- Identification System (AIS) transponders active at all times. This would allow for better tracking of vessels and warnings if they get too close to critical infrastructure like subsea cables.
- In July 2025, the Shefa 2 subsea cable providing internet services to Orkney and Shetland was damaged by fishing vessel activity. This resulted in households and businesses being disconnected for 14 days. Some ISPs were able to use an alternative infrastructure to ensure their users remained connected, one ISP in particular was unable to use this option. We call for Ofcom and the Government to ensure that ISPs have clear contingency plans in place and easily available for island residents to access.
- We also urge Ofcom to ensure that ISPs take up resilience options for their supplies
 where they are available and there should be a mechanism where available
 resilience options can be utilised without owners of said resilience options charging
 prohibitively high costs to access them during outages by other ISPs.
- 6. <u>Do you agree with the Government's strategic priorities and desired policy outcomes</u> for postal services? Are there alternative or additional strategic priorities and desired <u>outcomes you believe are required?</u>

Orkney Islands Council broadly supports the Government's strategic priorities for postal services, particularly the commitment to maintaining a universal postal service that is affordable, efficient, and sustainable. We welcome the recognition of the importance of postal services to vulnerable users and remote communities, and the emphasis on reliability, quality of service, and resilience. These priorities are especially relevant to Orkney, where postal services remain a lifeline for residents and businesses due to geographic isolation and limited alternatives.

The postal service in Orkney is facing growing vulnerabilities, as recent resourcing issues have disrupted both letter and parcel deliveries earlier in 2025 in the Harray, Evie and Finstown areas. Royal Mail has acknowledged these staffing shortages and even arranged a collection point, Harray Community Centre, to help residents access their parcels while recruitment efforts for both permanent and temporary staff continue.

Service disruption earlier in 2025 highlighted the urgent need for additional safeguards and targeted regulatory attention. Residents in areas such as Harray went without deliveries over an extended period, and had to pick up deliveries themselves, in bulk, from the local community hall.

This strain adds to broader concerns in the region: rerouting mail through Glasgow has exposed systemic weaknesses, while poor communication has left many residents

anxious about missed medical and hospital appointments. Staffing shortages remain a core issue, compounded by slow recruitment and inadequate contingency measures—leaving the service unable to maintain a reliable and equitable delivery standard across the islands.

We urge Ofcom and the Government to adopt a place-based approach that includes:

- Monitoring and enforcing service reliability standards in rural and island areas.
- Addressing affordability, including surcharges and access to fair parcel delivery.
- Ensuring contingency planning and resilience, especially in light of recent cyber threats and adverse weather events such as Storm Floris in August 2025.
- Including bulk and access mail delivery standards within regulatory oversight, given the reliance on such services for critical communications from the NHS, banks, and government.

We also support enhanced collaboration between Ofcom, Royal Mail, and local authorities to ensure that postal services remain equitable and effective for all UK citizens, including those in the most remote parts of the country.

The postal service remains a vital lifeline for communities across Orkney. In remote and island areas, it plays a crucial role in ensuring access to essential services, including banking, government correspondence, prescription delivery, and parcel logistics. For residents without reliable digital connectivity or transport, the local post office often serves as a primary point of contact with wider public and commercial services. Its continued presence and accessibility are therefore fundamental to social inclusion, economic participation, and community resilience.