Commission for
Communications Regulation

Report

Postcodes

Document No:	**05/07**
Date:	**26 Janaury 2005**

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Contents

1 Foreword

This document sets out ComReg's summary of the main points in the debate we initiated about the benefits that might accrue from the introduction of a system of Postcodes in Ireland, and our suggestions about how these might be realised.

It draws on the responses to our consultation on the Universal Service Obligation[1], the discussion at ComReg's *Postcode Symposium* held on 24 November 2003, subsequent submissions requested by document 03/138 and research undertaken by ComReg.

Postal companies originally introduced Postcodes simply to facilitate the automation of mail sortation. Postcode systems were, however, beneficially exploited in many other ways, both by the postal companies themselves, other stakeholders in the postal sector, and by industry, commerce and public services in general.

An Post was a relatively late entrant into the field of automated mails processing, and so moved directly to an OCR (Optical Character Recognition) based system which they were advised obviated the need for a public postcode.

Unfortunately this could not overcome the fundamental problem that at least 40% of the Irish population lives in rural areas where many households can share the same address[2] and it is only the local knowledge of the delivery post person that ensures the postal item gets to its intended recipient.

ComReg recognises that place names are part of the nation's cultural heritage and, particularly outside of Dublin, there is great local attachment to such names. Postcodes can be designed to be straightforward while ensuring the traditional townland name, regardless of language, is retained. The need to give names to roads and to number houses in rural area / villages can also be avoided.

Isolde Goggin
Chairperson

[1] See ComReg Documents 02/95 and 03/50

[2] In some townlands over 100 households can share the same address.

2 Introduction & Summary

This document summarises the main points in the debate ComReg initiated about the benefits that might accrue from the introduction of a system of Postcodes in Ireland, and recommends that a more detailed feasibility study be undertaken on the introduction of Postcodes.

ComReg first raised the issue of Postcodes in the context of its consultation (02/95) about An Post's delivery obligations. A Postcode Symposium was subsequently held on 24 November 2003 at which all the issues were discussed and further submissions were sought (document 03/138).

The main advocates for Postcodes are the holders of Postal Service Authorisations and other postal operators, major utilities such as *eircom* and ESB Networks, banks and the Direct Marketing Industry and a wide range of Governmental Organisations and Academics.

The Small Area Spatial Code being developed by Government may meet the needs of the last two groups. However, a Postcode used by the general population on a day to day basis will be of greater utility than one used only within government / industry databases, and would therefore complement these initiatives.

Postcodes were introduced in the 1970s/1980s originally to facilitate the automated sorting of mail. At present, 117 UPU member countries use postcodes as part of their addressing systems.

An Post was a relatively late entrant into the field of automated mails processing, and was therefore able to skip earlier generations of sorting technology and introduce a system based on OCR (Optical Character Recognition) technology which they were advised obviated the need for a public postcode. Because 40% of Irish addresses are not "unique" the OCR technology cannot match the address written on the envelope with the list of delivery points.

In all ComReg has received around 50 submissions from interested parties. The major postal operators other than An Post, have indicated their full support for the introduction of a public postcode. In addition there were many more comments received on specific aspects of postcodes.[3] This report does not attempt to summarise each of those submissions and to respond to every point made but rather analyses the benefits that could accrue to the Irish economy and what needs to be done to realise those benefits.

[3] A full list of contributors is at Appendix 1

Having considered all the submissions and arguments for and against, ComReg believes that the introduction of a public postcode can make a positive contribution to the development of the postal sector in Ireland. The main benefits of introducing a public postcode system in Ireland, in ComReg's view, include:

- giving rural householders a 'unique address' without the loss of townland names
- bringing Ireland into line with best international practice
  - boosting National Competitiveness
  - improving the efficiency of Irish business i.e. companies and public bodies, such as health boards, who provide services and sell goods to customers throughout the state
  - improving the efficiency of the postal sector, and
  - stimulating growth of the postal sector
- making it easier to realise the Government's plans to develop a Small Area Spatial Code.

Each of these benefits is considered in turn in the next three chapters of this report.

ComReg proposes that a representative working group be established which would be charged with the development of a business case and implementation plan for the introduction of a public postcode. The working group would seek input from all major stakeholders.

3 Unique Addresses

3.1 Local Authorities responsible for Names of Towns, Roads etc.

There is considerable interest in place names, where they come from and what their meaning is, and there is a great local attachment and loyalty to many names. Place names are an important part of Irish life and date back to Celtic Ireland.

Local authorities have the formal legal responsibility[4] for the names given to towns, parishes, townlands and roads. Outside the main urban areas roads are rarely named and buildings are not numbered. In rural areas of Ireland there are over 62,000 townlands, served by 87,000km of non-national roads.[5]

The townland is normally the only "address" currently available in rural areas but this is not unique to individual households. For example, in the townland of Killasser, near Swinford, Co Mayo there are over 100 households and in this townland up to 8 households that share the same surname. A similar position exists in villages and small towns where often the street or road is named, e.g. "Main St" or "Dublin Road", but there are no numbers for the individual houses.

Any scheme to replace this address structure in rural areas with one similar to that which exists in the main urban areas, i.e. every road named and every building numbered, would be both expensive[6] and in some areas may prove unpopular.[7]

3.2 Unique addresses needed by postal operators and others.

The lack of unique addresses in rural areas and small towns is a major issue for postal operators and many other organisations. The following contribution to our debate sums up the issue:

> *"Over 40% of buildings in the State have a non-unique address (both urban and rural). The consequent inability to clearly identify residential and business addresses imposes a significant cost burden on the economy in terms of the inefficiency and cost associated with the delivery of services (Government and private sector services)."*
>
> ***eircom***

[4] The Local Government Act, (LGA) 1946 (No. 24 of 1946) sections 76-79 as amended by section 53 of the LGA 1955 (No. 9 of 1955) Part 18 (s 188-197) of the LGA 2001 (No. 37 of 2001) amends these requirements but has not yet been commenced.

[5] Department of Environment, Heritage and Local Government estimate.

[6] An Post's Response to ComReg 03/138 Response to Q1 "the high cost – estimated at approximately €50m by the Department of the Environment in 2003"

[7] ComReg received a significant number of responses to consultation 02/95 which objected to the introduction of a public postcode system, having been led to believe that it would involve the use of road names rather than townland names in rural areas.

An Post have traditionally relied on the local knowledge of the postman and his/her familiarity with the addresses served, in order to effect correct delivery. The centralisation of mail deliveries onto the larger centres together with societal changes will limit the future effectiveness of this solution.

There are now a number of companies delivering in rural areas and small towns who encounter problems arising from the lack of unique addresses. As postal markets are being opened to competition so developments such as e-commerce and teleworking will increase the demand for such delivery services in rural areas.

Postcodes offer a viable solution to this problem. It has been argued by An Post that the introduction of postcodes will necessitate giving every road a name and every building a number, at a significant cost. ComReg believe that such an approach is not necessary.

It is possible to allocate a code to every delivery point (i.e. house or business premises) in a townland in a methodical way so that every person who is aware of the coding convention can identify where a specific delivery point is situated in relation to another delivery point or to a reference point. This enables the retention of the current address both in English and Irish irrespective of spelling. A postcode also overcomes the data protection / privacy issues that arise when a person's name and address is stored on a database in order to identify a specific delivery point.

3.3 Unofficial names required by An Post in some cases.

The official names given to towns or other areas are not always suitable for An Post's operational purposes and there are many instances where An Post require postal users to include *"the name of a town ... with which the addressee has little or no connection"* and in some case "*the name of the neighbouring county"*.[8]

In some instances postal users object to using these "postal addresses". In extreme cases An Post have been forced to change their policy[9], while in others the issues remain a subject of contention between individuals and An Post. Where customers use the correct "official" address rather than the "postal address" required by An Post this can cause delay to letters and extra work for An Post.

On the other hand use of An Post's "postal addresses" can cause confusion for other postal service providers who structure their operations in a different way.

There are also implications for public bodies, e.g. An Garda Síochána, other emergency services, ESB and other utilities when it is necessary to decide which organisation or branch needs to identify an exact location to deal with an emergency.

[8] Example include parts of East Clare (required to use Limerick), West Waterford (required to use Youghal, Co Cork or Clonmel Co. Tipperary) and North East Galway (required to use Castlerea, Co Roscommon)

[9] The most obvious example is the substitution of "Dublin 6w" for "Dublin 26" for addresses served by An Post's (new) delivery office at Fortfield Road.

4 International Best Practice

The UPU[10] describes the Postcode as the fundamental, essential element of an address, and a unique, universal identifier, which unambiguously identifies the addressee's locality and assists in the transmission and sorting of mail items. At present, 117 UPU member countries use Postcodes as part of their addressing systems. Ireland is the only country in the European Union[11] without a system of postcodes and indeed one of the few in the developed world.

The benefits of postcodes in relation to international best practice are considered in the following sections.

4.1 Boosts National Competitiveness

As one contributor to the debate argued

> *"... the introduction of a comprehensive unique addressing geographic postcode will provide significant benefits to the competitiveness of the national economy and the efficiency of Irish business, and will generally promote a more open competitive environment."*

National competitiveness is key for Ireland as it is one of the most open economies with imports & exports accounting for approx 84% of trade[12].

The Annual Competitiveness Report 2004[13] emphasises that *"adequate transport and communications links to support efficient movement of goods, people and information are vital for international competitiveness"*

Access to the global networks of International Express Industry is clearly important in this regard. but the lack of a Postcode system restricts the ability of the industry to provide the same standard of service as in other countries.

4.2 Improves efficiency of Irish business

The largest users of the post are those companies and public bodies who provide services and sell goods to customers throughout the State.

These stakeholders report that it would be much easier for them to obtain correct address details from their customers if there was a public postcode. In particular they could use rapid addressing systems that suggest an address when the postcode is

[10] Universal Postal Union, an inter-governmental organisation responsible for the postal sector.

[11] See list at Appendix 2

[12] Source: Statistical Year Book

[13] National Competitiveness Council Annual Competitiveness Report 2004 Sec 2.2.2 Transport http://www.forfas.ie/ncc/reports

entered. This address can be confirmed with the customer rather than having to enter all or part of the address with all the opportunities for mis-spelling etc.

Utility companies, who are major users of the post for billing, sales, and customer service, all report that a public postcode would facilitate more accurate identification of the location at which they need to provide / restore the service. BreastCheck[14] said they rely heavily on the use of postal services and postcodes would help to ensure that appropriate information is sent to each individual.

These Stakeholders[15] argue that the availability of a public postcode is a vital aspect of the national economic infrastructure.

4.3 Efficiency of Postal Sector

Generally postal service providers favour the introduction of Postcodes and claim that the lack of a public Postcode system imposes unfair, unnecessary and unjustified costs on every operator and user of transport and delivery services to, from and within Ireland. This creates a barrier to competition in the provision of postal services in Ireland.

The sorting processes of these large global operators are normally driven by the public Postcode. The lack of such a Postcode in Ireland leads both to extra costs in adapting machinery and more reliance on manual intervention. This impacts on the accuracy of sorting / delivery, reduces quality and leads to operational inflexibilities.

Delivery too is affected. The deficiencies in the official address structure and the different "postal address" required by An Post lead to increased costs in identifying where an item should be delivered. The case for having postcodes found strong support across the sector.

4.4 Growth of Postal Sector

The postal sector in Ireland has never developed to the same extent as in other developed countries. Mail volumes per capita are still around half of those in most of the EU-15 countries. In 2002 196 items of mail were posted per head of population, compared to 354 in Britain, and 372 in Finland.[16] Can a public postcode help reverse this trend?

In this regard it is of value to make a comparison between the composition of the number of mail items per delivery point each day in Ireland and the Netherlands:

[14] BreastCheck, the National Breast Screening Programme,

[15] Appendix 3 Major business comments on the advantages of postcodes

[16] Source UPU Statistics. In 1996, the last year for which data from a wider range of countries is available the Irish figure of 145 items per head compares with 309 in Britain, 379 in Finland, 329 in Belgium, 416 in France, 246 in Germany and 503 in Sweden.

Comparison with Dutch & Irish items per delivery point per day

	IRELAND		NETHERLANDS	
	2002	%	2002	%
Mail posted in bulk (by business customers)	0.76	45%	2.79	78%
Single-piece mail (ie ordinary correspondence posted by individuals and businesses)	0.63	38%	0.63	18%
International Mail received for delivery (from individuals and businesses)	0.28	17%	0.16	4%
Total Items Delivered	1.68	100%	3.58	100%

Source: ComReg analysis of data published by An Post and TPG

This analysis demonstrates that the variation in mail levels by delivery point is due to different approaches in the use of mail by business (it will be noted that the use of single piece mail by individuals is exactly the same for both Netherlands and Ireland) in addition to differences in international mail volumes. In many European Countries, including the Netherlands, Direct Mail is the key driver of mail volumes.

At the Postcode symposium on 24 November 2003 Mr. Alistair Tempest of FEDMA[17] presented an analysis that correlated a number of factors with mail volumes arguing that better postcode systems could help build mail volumes.

According to the FEDMA analysis, the most important factor to influence mail volumes is the availability of mailing lists. An Post owns a subsidiary that specialises in developing this market – Precision Marketing Information Ltd. (PMI). In its contribution to the debate on a public postcode the company states:

> *"....we believe that through the introduction of a postcode system we could offer a wider and more cost effective range of products and services to our customers. Additionally, through the improvement in the data quality and with the ability to target more efficiently (i.e. to a smaller catchment of dwellings) this would assist in reducing the amount of unaddressed, and possibly mis-sorted mail, in circulation and as such help in growing the direct marketing (mail) industry."*

Address structures and the design of the postcode system also impact on mail volumes, according to this analysis, and as already noted postcodes will tackle the deficiencies in address structure.

> *" ..one explanation for the relatively slow rate of mail growth in Ireland may be that it is the only member state without a postal code system. A well constructed postal code system facilitates development of high-level direct mail services, and so the lack of such a system may restrict mail growth."*

Report by WIK for EU Commission[18]

[17] Federation of European Direct Marketing Associations

5 Small Area Spatial Code

The debate on Postcodes has included many useful contributions from academics, who generally favour public postcodes because of their research value in areas such as economics, health, planning and survey sampling.

The term 'Spatial data' is data that in some way relates to a position in space, or more specifically, on the earth. Analysis of spatial data is an important tool in academic research. For the population census the basic unit is the District Electoral Division (DED). There are about 3000 DEDs that were set up in Victorian times. This has some disadvantages

- Its relatively large scale
- The difficulty of coding addresses as commonly used into DED
- The lack of familiarity by the public of DED boundaries.

A widely implemented Postcode system could get over these problems and lead to better and more refined analysis. Desirable features of such a system could include

- Ease of recollection by the public
- A clear integration with a genuine grid-based geographical code.

A contribution to the debate by a representative of the CSO (Central Statistics Office) is worth noting.

> *"A coded address would provide more information about where a person lives. To achieve greater usability need to make the post code as familiar to the person as their telephone number. The frequency of use will increase familiarity"*

The Irish Government is committed to developing a Small Area Spatial Code and has established the Irish Spatial Data Infrastructure (ISDI) Project. This project will lead to the definition of small areas for the analysis of spatial data throughout the public sector.

Strategy for Statistics, 2003-2008, which has been prepared by the National Statistics Board for the Government, sets out a vision for the future development of the Irish Statistical System covering economic, social and environmental statistics. In relation to the need for a small area spatial code it comments:

> *"Outside of the Census, it is difficult at present to gather or compare data at any geographical level lower than a county. In general it is also not possible to link data based on administrative records with the small area*

[18] Main Developments in the European Postal Sector wik-Consult Study for the European Commission, DG Internal Market July 2004 Section 6.1

Electoral Divisions used in the Census. The absence of a good post code system throughout the country hampers our ability to use statistics to understand what is happening at the level of localities. The widespread use of a good post-code system would facilitate the linking and integration of spatial information. It would be of particular value in informing and further refining the National Spatial Strategy. Post-coded information would also facilitate the linking of statistics from different data sets, e.g. on health status and educational participation in particular communities.

Strictly speaking, these two developments lie outside the arena of the statistical system but are crucial to realising its full potential. …"

The Cabinet decision on the report of the Steering Group on Social and Equality Statistics (see Appendix 5) also recognises the role that Postcodes can play in the analysis of spatial data.

In other countries the "postcode" developed by the postal operator met the needs of Governments and Commercial Interests and it has not been necessary to "reinvent the wheel." In the absence of a Postcode in Ireland much work has been done by Government to develop a Small Area Spatial Code, and if a decision is taken to develop a Postcode to meet the needs of the postal industry it must be on the basis that the work undertaken by one project complements the other, and that the basic rules to define areas in both codes will enable direct comparisons.[19]

The great advantage to all parties is that the Postcode is used by the general population on a day to day basis, and because of this it is of greater utility than one used only within government / industry databases. In 2000/1 96.3% of letters posted in Britain had a postcode on them and knowledge of the Postcode was essential to access services such as Bank Loans, Air Travel and even Pizza Delivery.

[19] It is likely that the Small Area Spatial Codes will cover a larger area than an individual postcode, in order to protect data about individuals. It is important that any postcode system will enable the aggregation of postcode areas to form one Small Area Spatial Code.

6 ComReg's recommendations

6.1 Postcodes are needed

Having considered all the submissions and arguments for and against, ComReg believes that the introduction of a public postcode can make a positive contribution to the development of the postal sector in Ireland.

Postcodes can be designed to identify a group of buildings in urban areas with road names and house numbers, and individual buildings in townlands, villages and small towns where there is no "unique" address. A postcode system can be designed to

- Ensure the traditional "townland" name is retained whilst simplifying addresses written in Irish for International companies to identify.
- Avoid the need to name roads and number houses in rural areas / villages.
- Avoid data protection / privacy issues related to An Post's geo-directory, which requires an occupier's name to be recorded on the database.

6.2 Role of An Post

In the response to the debate with regard to the introduction of a public postcode An Post point out that given the deployment of an advanced technical (hidden) postcode using automated sorting machinery and the comprehensive GeoDirectory database of addresses, a public postcode is not necessary for An Post's business of sorting and delivering mail to a high-quality specification.

An Post state they have no objection to the introduction of a public postcode but further point out that they have neither the responsibility nor the financial resources to develop a public postcode independently. However once these principles have been established, An Post are more than happy to engage in this debate and to consider involvement in any ensuing process.

In these circumstances a postcode system in Ireland should therefore be developed by all postal service providers for the benefit of that sector as a whole.

6.3 Proposals for taking the issue forward

ComReg proposes that

- A Working Group of all holders of Postal Service Authorisations and An Post should be established.
- ComReg to act as a facilitator.
- The Working Group employ consultants with expert knowledge of developing Postcode systems to develop a business case and

implementation plan for the introduction of a public postcode – cost estimated at about €200,000. This phase should be completed within 4 to 6 months.

- Input must be obtained from all the major stakeholders – National Statistics Board, Government Departments, etc.

6.4 Principles to be taken into account

The benefits of a public postcode will only be fully realised if it used by everyone once it is implemented. While An Post claims that it can take a long time to achieve high levels of usage the Dutch Post Office achieved 90% usage rates[20] within three years at a time when other usages of postcodes were not as common as they are today. However, in order to achieve a high usage rate ComReg considers it VITAL that all postal operators should accept the official[21] names of townlands, roads, Towns, Counties, etc and not require the use of different names (including road names in rural areas) for their own operational convenience.

There are a number of complex technical issues that need to be taken into account in designing postcodes and these are set out at Appendix 4. However, it is desirable to set out some general principles that underline the work being undertaken moving forward .

- It is a public postcode that is proposed, not a "hidden" or technical code.
- It should be structured, at least to the level of specific areas within each county.
- It must be easily memorised so that it will gain maximum usage.
- It must solve the issue of non unique addresses without asking people to change the name of their townland, parish or county.
- It must be neutral as between operators. In particular it must enable the postcodes to be aggregated for operational purposes in whatever way each operator desires. Just because An Post has decided to deliver mail for East Clare from Limerick doesn't mean that another operator cannot decide to use Ennis as its base for the whole of Clare – and the postcode shouldn't ask the addressee whose affinity is with Clare to use a different county name in the address.
- The approach to funding should ideally be self financing /minimal cost to operators and government.

[20] 1976: PTT introduces the postcode for bulk mail (its use is initially optional, but is made obligatory in 1980). Private individuals start using the postcode in 1978. One year later, half of all postal items bear the postcode, three years later more than 90% [source: Royal TPG (Netherlands Post Office) Press Pack 2002]

[21] see Section 4.1

- The working group will also have to agree "ownership" issues.

6.5 Action Points for consideration by the proposed Working Group

(i) Agree the Terms of Reference.

(ii) Investigate options for building, promoting and maintaining the postcode

- existing databases (ESB, Local Authorities, OSI, An Post, etc)
- advertising/promotion
- Influencing Irish businesses and government departments to use it
- commercial exploitation of value added opportunities

(iii) Consider the approach to funding

- Ideally self financing /minimal cost to operators and government

(iv) Agree "ownership" issues

Other issues to be taken into account include

- Need for National Statistics Board oversight
- Must complement work being done on
    - ISDI - Irish Spatial Data Infrastructure
    - Small Area Spatial Codes
- While the efficiency benefits from the introduction of postcodes should accrue later, once off costs will be incurred upfront to update all databases with the postcode. i.e. budgets of major government departments that hold databases will incur costs upfront.
- Need to assess impact on provision of government services, e.g. Emergency Services, Health and Social Welfare, Vehicle Registration, PPS number, Electoral Register, Civil Registration, Census

7 Conclusions

(i) Postcodes can benefit the postal sector, the efficiency of Irish business, the provision of government services and national competitiveness.

(ii) Potential Benefits warrant a more detailed investigation of what needs to be done to successfully introduce postcodes.

(iii) ComReg recommends that the proposed Working Group be established to investigate in more detail the feasibility of introducing postcodes in Ireland.

(iv) The Working Group to report within 6/8 months on their recommendations for further action.

ComReg would like to thanks all contributors for their input to the debate.

Appendix 1 List of contributors to the debate

NB This list contains the names of all those organisations and individuals who responded to document ODTR 02/95, ComReg 03/138 or who attended the *Postcode Symposium* organised by ComReg on 24 November 2003

AddressIreland
AIB
ALLWRITE
An Post
Anglo Irish Bank
Bank of Ireland
Canada Post
Central Statistics Office
Chambers of Commerce of Ireland
Coiste Logainmeacha/The Placenames Committee, Galway
Commision for Electricity Regulation
Communications Workers' Union (CWU)
Consumer Choice Magazine
DAFIL
D'Arcy Smyth & Associates
Department of Communications, Marine and Natural Resources
Department of Environment & Local Government
Department of Geography
DHL
Direct Communications
DKM Consultants
Dublin Transportation Office
Duigital Messenger Ltd
Eircom
ESB- Networks
ESB-Customer Supply
ESRI
European Express Association
Everson Typography
Experian Ireland Ltd.
FedEx
Federation of European Direct Marketing Associations -FEDMA
Fingal County Council
General Council of County Councils
GeoDirectory
GLS Holding B.V.
Hays DX Ireland
Irish Association of International Express Carriers (IAIEC)
IBEC
ICMSA
IDS Media Group
Institute of Public Health
International Post Corporation
Irish Direct Marketing Association Ltd (IDMA)
Irish Missionary Union
ISME
Kompass Ireland
Mailroom Equipment Ltd.
Mapflow
Mediaforce Ireland
MSC Promotion Office
NAC Geographic Products Inc
National Cancer Registry
National Statistics Board
Nightline
NIRSA
NTL
NUI, Maynooth
Office of Data Protection Commissioner
Office of the Director of Consumer Affairs
Ordance Survey of Ireland
PA Consulting
Pitney Bowes
Precision Marketing Information Ltd.
Public Health Department
Pulse Solutions
Purchasing Solutions
Railway Procurement Agency
Reach
Royal Mail Group
Securior Omega Express Ireland Ltd

Small Firms Association
Social Inclusion Unit South Dublin County Council
Society of Chartered Surveyors
South West Regional Authority
Target Marketing
The Bill Moss Partnership
TICo Group Ltd
TNS MRBI
Vodafone

Breast Check, National Breast Screening Programme, Dublin
Eastern Regional Health Authority
Everson Typography
IEA
Institute of Public Health
Irish Cervical Screening Programme, St. Josephs Hosp Limerick
Mid Western Health Board
National Cancer Registry
National Disease Surveillance Centre
National Statistics Board
NIRSA, NUI Maynooth
Open University, Milton Keynes, UK
Prof of Public Health, UCC
Reach
South Eastern Health Board

Aclare Community Alert, Co Sligo
Ballinamore Area Community Council
Ballinamore Area Community Council Ltd
Ballyforan/Dysart Community Alert, Ballinasloe, Co Galway
Connaught Gold co-op petition - 16 names
Curry GAA Club
Curry Moylough Community Development Association
Irish Country Womens Association, Cavan Federation
Louisburgh Community Project, Co Mayo
Monaghan Town Guild ICA
Roscommon County Development Board
Sligo VEC petition - 10 signatures
Tarmonbarry Community Alert Committee
The West Cavan Community Centre, Blacklion Co Cavan
Tumna Shannon Development Co Ltd
Westmeath Community & Voluntary County Forum

Aidan Flynn, Co Roscommon
Alice Mulligan, Co Roscommon
Ann O'Leary, Co Kerry
Anne & Eamon Coyle, Roscommon
Anne Clogher, Co Roscommon
Anne Spillane, Co Kerry
Barra O' Muirthile, Dublin 6W
Brendan Kivlehan
Brian J Goggin Co Limerick
Bridie Clifford, Co Kerry
Bridie Moran, Co Leitrim
Caitlin Ban Ui Bhaoill, Co Dun na nGall
Catherine Hannan, Co Roscommon
Catherine McMullen
Catherine Smith, Co Roscommon
CM O'Neill, Co Cavan
Daniel Rochford
David Havelin, Dublin 6W
David Kelly
David Lyons, Dublin 8
Des Fitzpatrick, Co Kerry
Diarmuid Collins, Carlow
Donal O'Brien, Co Cork
Dr S Ua Concubair, Gallimh
Eamon O'Connor, PP, Co Roscommon
Edward Hudson, Co Meath
Eithne Fitzgerald, Dublin 16
Francis M Beirne, Co Roscommon
Gen Pub, Co. Kerry
I O'Carthy, Co Kerry
Jack Terry
Joe Rafferty, Connemara
John Brennan, Co Sligo
John Colgan, Co Kildare

John Cosgrave
John Duggan, Co Cork
John Higgins, Co Westmeath
John O'Sullivan, Co Kerry
Ken Westmoreland
Kerry Ann O'Farrell, Co Kerry
Kevin Clogher, Co Roscommon
Kevin Ward, Co Donegal
Kitty Gately, Roscommon
Liam Lyons, Co Mayo
Luke Sexton, Cavan
M Fleming & Family
Maire Nhic Laifeartaigh, I dTir Chonaill
Margaret Donohue, Co Meath
Mark Shiel, Dublin
Mary Dowd, Co Kerry
Mary Murphy, Co Kerry
Mary Naughton, Co Galway
Maurice Barrett, Dublin 16
Michael Rochford
Michael Smith, Co Cavan
Nora O'Sullivan, Co Kerry
Paddy Mulhern
Pat Mattimoe, Galway
Patrick Crossan
Peadar Kivlehan, Ballymote
Raymond Cunningham
Rev James Casey, Roscommon
Richard Barry, Dublin 4
Sabha Mhic Oireachtaight, Co Dhun na nGall
Sarah E Clarke
Sean Beirne, PP, Co Galway
Stephen Connolly
T O'Ciarnain, Co Westmeath
Thomas & Phyllis Fahey & Family, Co Roscommon
Thomas Mannion, Co Galway
Tom Hayes, Cork

Standard Letters

Alphonsus Marray, Co Roscommon
Anne Crossan, Co Roscommon
Anthony Geraghty, MCC, Athlone
Benny & Dorothy Mulrenna, Co Roscommon
Bernard Higgons, Co Roscommon
Breege Murray on behalf of family, Co Roscommon
Brendan Connor, Co Roscommon
Brendan DeNash, Co Roscommon
Brian & Kathleen Battles, Co Roscommon
Brian & Mary Fallon, Co Roscommon
Brigid Beirne, Co Roscommon
Casey Family, Co Roscommon
Catriona Gately, Co Roscommon
Charles Beirne, Co Roscommon
Charlie & Bridie Finneran, Athlone
Christina Egan, Co Roscommon
Christina Kelly & Family, Co. Roscommon
Coyle Family, Athlone
Darragh Kelly, Co Roscommon
Denise Mc Donnell, Athlone
Denise & Mary Cunniffe, Roscommon
Edel Beirne, Co Roscommon
Edel Stevens, Roscommon
Eileen Flannery, Co Roscommon
Eileen Kelly, Co Roscommon
Eileen Mahony, Co Roscommon
Elizabeth Dwyer, Co Roscommon
Elizabeth Gaffney, Co Roscommon
Evelyn & Seamus Keane, Co Roscommon
Fergus Moffett, Co Roscommon
Fr Francis Beirne, PP
Frank & Josephine Carney, Co Roscommon
Gerard Feeney, Co Roscommon
Healy Family, Co Galway
Ita Moffett, Co Roscommon
James Deleish, Co Roscommon
James Kelly, Co Roscommon
James Kihline, Co Galway
James Rattigan, Co Roscommon
Joan Higgins, Co Roscommon
John & Mary Garvey, Co Galway
John & Una Byrne, Co Roscommon
John DeNash, Co Roscommon
John Dillon, Co Roscommon
John Dixon, Co Roscommon

John Flynn, Roscommon
John Kelly, Co Roscommon
John Murphy, Co Roscommon
Joseph Beirne, Co Roscommon
Karina Jones, Co Roscommon
Kathleen Dixon, Co Roscommon
Kathleen Kelly, Co Roscommon
Kathleen Quinn, Co Galway
Kittly Conroy, Co Roscommon
Laura Lennon, Co Roscommon
Lena Doyle, Athlone
Liz Fallon, Athlone
M McCormack, Co Roscommon
Margaret Kelly, Co Roscommon
Margaret Muly, Roscommon
Martin & RoseMary Keane, Co Roscommon
Martina Feeney, Roscommon
Marty Flanagan, Co Roscommon
Mary Keaveney, Co Roscommon
Mary Kehline, Co Galway
Mary McDonnell, Athlone
Mary McGreevy, Co Roscommon
Mary Murphy, Co Roscommon
Mary O'Brien, Athlone
Mary Shanagher, Co Roscommon
Mattie Conroy, Co Roscommon
Maura Murray, Athlone
Maureen & George Galvin, Co Roscommon
Michael & Freda Jones, Co Roscommon
Michael Conroy, Co Roscommon
Michael Cunningham, Co Roscommon
Michael McGreevy, Co Roscommon
Michael Mulvey, Roscommon
Michael Sweeney, Co Roscommon
Michelle Kelly, Co Roscommon
Nancy Cirby, Co Roscommon
Nancy Kelly, Co Roscommon
Noel & Carmel Feeney, Co Roscommon
Nora Feely, Roscommon
Nora McLaughlin, Roscommon
Noreen & Breege Duffy, Co Roscommon
Noreen Kelly, Co Roscommon
Nuala & Joe Cunnane, Co Roscommon
Oliver Stroker, Co Roscommon
Paddy Harrington, Roscommon
Pat & Peg Clogher, Co Roscommon
Pat Hynes, Mayor of Loughrea
Patricia O'Benash, Co Roscommon
Patrick & Kathleen Hunt, Roscommon
Patrick McDermott, Co Roscommon
Paul Kelly, Co Roscommon
Peggy Dempsey, Co Roscommon
Rev Seamus Cox, PP, Co Roscommon
Seamus Walsh, MCC, Co Galway
Sean & Peggy McDonnell, Co Roscommon
Sheila Kelly, Co Roscommon
Stella & Eamon Clogher, Co Roscommon
SW Kelly, Co Roscommon
Teresa Clogher, Co Roscommon
Thomas & Ellie McDonnell, Co Roscommon
Thomas & Kathleen Dowd, Co Roscommon
Tina Stevens, Roscommon
Tom Crosby, MCC, Co Roscommon
Tommy & Maura Murphy, Co Roscommon
Tony Ward, Athlone,
Una Treacy, Roscommon

Appendix 2 - Structure of Postcodes in EU and other selected countries

Member State / Candidate Country	Format	Depth of Coding
Australia	2060	Delivery area
Austria	1010	Delivery Office
Belgium	4000	Delivery Office
Bulgaria (Rep)	1000	Locality
Canada	H3Z 2Y7	Local delivery unit
Cyprus	2008	Delivery area and method
Czech Rep	100 00	Delivery Office
Denmark	8660	Routeing zone
Estonia	69501	delivery office, delivery round or major customer
Finland	00550	Delivery point
France	33380	Delivery Office
Germany	22767	Town, commune or group of delivery districts
Great Britain	EC1Y 8SY	Delivery point
Greece	151 24	Destination post office; only applies to cities with more than 50,000 population
Hungary (Rep)	1037	Destination
Ireland	NONE	
Italy	00144	Delivery area
Latvia	1073	Post Office
Lithuania	2600	Delivery Office
Luxembourg	4750	Locality
Malta	GPO 01	Postman's round
New Zealand	6001	Area of delivery route
Netherlands	1231 AB	Subdvision of delivery area
Norway	0025	Delivery Office
Poland	81-116	Delivery Office
Portugal	2725-079	Streets, districts, small localities
Slovakia	010 01	Delivery Office
Slovenia	4000	Post Office
Spain	28039	Delivery area, delivery route or link with rural areas
Sweden	114 55	Delivery route
Switzerland	2544	Place of destination
Turkey	01960	Locality
United States of America	22162-1010	Delivery segment

Appendix 3 Submissions about the advantages of postcodes in relation to efficiency

Major businesses have told ComReg about the advantages of postcodes in relation to the efficiency of Irish business:

> *"... allows commercial organisations better organise and manage its customer database. It further allows for better customer profiling and marketing."* ***Bank of Ireland***

> *".. avoid the inefficiencies, in providing the customer services, where the location of a customer was incorrectly interpreted by all involved. This has a cost saving to [ESB] Networks for the 2,200 Network Technicians (NT), in the field. "* ***ESB Networks***

> *" ... will enable businesses to become more efficient in the management and maintenance of their marketing and customer databases."*
>
> ***Irish Direct Marketing Association***

> *"... it will significantly enhance the efficiency and competitiveness of Ireland's delivery service infrastructure."*
>
> ***Irish Association of International Express Carriers***

Major businesses have told ComReg about the advantages of postcodes in relation to the efficiency of postal sector:

> *"... a postal code is imperative to guaranteeing quality and efficiency in sorting and delivery services. As such a postal code system is ... [essential] to provide our customers with the best service possible ."*
>
> ***European Express Association***

> *"Increased productivity and efficiency within [our] express operation"*
>
> ***FedEx***

> *"failure to introduce postcode ... has also imposed additional and unnecessary costs ... need to devote significant manpower and capital resources to the task of routing significant volume of freight within our nationwide network"*
>
> ***Securicor Omega Express (now part of DHL / Deutsche Post)***

> *"Private logistics and delivery firms could significantly streamline operations and maximise efficiencies from ground transportation networks."*
>
> ***Nightline***

> *"... committed to fully supporting the speedy development, adoption and launch of an effective, universally accessible and low cost postcode".*
>
> ***Irish Association of International Express Carriers***

In the public sector BreastCheck, The National Screening Programme, has told ComReg about the advantages of postcodes in relation to the efficiency of postal sector:

> *"BreastCheck,The National Breast Screening Programme, firmly believes that the introduction of postcodes would enable us to deliver a much improved service to our clients. . . The Programme relies heavily upon use of the postal services as all women receive numerous items of correspondence from BreastCheck as they move through the screening process. Given the large volumes that the programme deals with (more than 70,000 women since 2000[to 2003]) there is considerable scope for postal address error.*
>
> *The addition of postcodes would increase accuracy and help to ensure that the right woman receives the full complement of information. This is especially important in the more rural areas where the Programme operates"*

Appendix 4 Design & Structure of Postcodes

Postcodes were originally designed to facilitate the automated sorting of mail. Nowadays they are used much more widely e.g. address management, direct mail, to assist customers to find services such as restaurants, to track the delivery of orders, to manage the supply chain, to locate new stores or branches, to analyse markets on a geographic basis and many other uses inside and outside the postal sector.

ComReg has been fortunate to be able to draw on the experience of international experts who have been involved in the design and development of addressing systems and particularly postcodes. It must be borne in mind that a variety of postcode types exist and this section of the report provides a high level insight into the different types of coding available, discusses the hierarchy of depth of coding, degree of structure, and potential formats available and their relative pros and cons.

7.1.1 Public v hidden (technical)

Throughout the report the postcode that is being proposed is public and not a "hidden" or technical code. Therefore the first distinction that must be drawn is between a public postcode and a hidden postcode.

In the first case the owner/occupier of every premises is advised of the postcode to be used to ensure delivery of postal items to those premises. Businesses and individuals posting mail then have to be told of this code, either by the addressee or by the postal operator who usually publish directories and offer to check address lists.

When postcodes were first introduced usage was low. Today usage rates of around 95% are not uncommon. The key to this is that frequency of use increases familiarity, and as more and more businesses and public bodies use postcodes to provide services to customers the frequency of use increases.

The alternative to the public postcode is the "hidden" or technical postcode. In this case there is a postcode but it is not known to the addressee or, in many cases, to the sender. It will be applied to the postal item by the postal service provider and used to sort postal items automatically. In some cases it will be made available to the largest customers so that the code can be applied to "Bulk Mail" and "reply paid" items by the sender, often in the form of a pre-printed bar code. An Post currently have a "hidden" postcode. The disadvantage of the "hidden" postcode is that it is necessary first of all to obtain a correct address in order to ascertain the postcode and to use it.

In a country such as Ireland where almost half of all addresses are "non-unique, where the structure varies significantly from place to place, and where there are different spellings for many placenames as well two different languages the balance of advantage clearly comes down on the side of the public postcode, where by quoting or "reading" one line of code it is possible to identify the correct address (in whatever language is desired).

7.1.2 Structured / Unstructured

The next distinction that must be considered is between the structured and unstructured postcode, sometimes referred to as the intelligent / non-intelligent code.

With a structured code it is possible to gain valuable geographical information just by looking at it, e.g.

First digit	Province or Region
Second digit	County
Third digit	Town, or Rural Area associated with that town
Fourth digit	Area of town or townland
Fifth digit	Group of houses in urban area or individual house in townland
Sixth digit	Check digit to confirm that code is valid.

Alternative forms of structured code may be based on the national grid or other location references

An unstructured code however is just a series of sequential numbers and it is necessary to have a directory (either printed or electronic) to establish the precise address / location to which the address relates.

In practice there can be hybrid models. In the case of the above example there might be a structured code down to the level of the town and an unstructured code thereafter.

The structured code requires significant planning to ensure that it does not become obsolescent as a result of new developments, but it has the advantage that it can be "de-coded" relatively easily. It therefore has much greater utility. It is also more likely to be used – as the code means something to the addressee it is more likely to be remembered; for example, many people can tell what part of the country a car comes from simply by looking at the number plate. The main advantage of the unstructured code is that it is relatively easy to introduce and keep it up to date, but it loses much of its utility as a result.

7.1.3 Depth of coding

The next issue that needs to be considered is the depth of coding In some countries the postcode only identifies the town in which the address is situated. In others the postcode identifies which postperson will deliver the postal item. In others it will identify an individual building or group of buildings. In large countries, e.g. those with more than 20 million addresses such as Britain or Germany or the USA it is difficult to code down to the level of the individual building without having very long codes.

In an Irish context however there are only around 1.7m addresses to be coded, and for postcodes to contribute meaningfully to the issue of "non-unique" addresses it

would be necessary to code down to the level of individual delivery points in rural areas and small towns.

7.1.4 Level of redundancy

No country is static. New buildings are built, and others demolished all the time. It is difficult to predict precisely where new building will take place. However it is not feasible to be changing codes at regular intervals. So allowance must be made for possible future development. The longer the period before a revision of postcodes can take place the more provision must be made for new development, and potentially the longer the code.

7.1.5 Alpha / Numeric

Whether the postcode should be alpha or numeric or alpha numeric is another issue that needs to be considered.

Alpha codes can be the most efficient. With five numeric digits it is possible to allocate up to 100,000 individual codes. With five alpha characters it is possible to allocate up to 3.2million individual codes, on the basis of using only 20 characters[22] Using a mixture of alpha and numeric it is possible to allocate up to 24.3million individual codes, on the basis of using only 30 characters[23]. It is also possible to make the code more memorable, eg GAL could indicate Galway, but this reduces the number of individual codes significantly.

Alpha numeric codes offer the best of both worlds and are used for example in car number plates. However from the point of view of the computer user they present specific problems. As well as having to use two different key pads there will possibly be greater errors in switching between the two parts.

7.1.6 Elements such as checksum, Ranges reserved and excluded

It is also necessary to consider whether there should be a check digit at the end so that a computer can check using an algorithm whether the code has been keyed in correctly. Particularly in the case of alpha codes it is necessary to consider whether some ranges should be reserved or excluded. For example the numbers 999 are traditionally associated with the emergency services, while political parties might not be too happy if their postcode contained letters associated with another party.

[22] To avoid potential confusion some characters may need to be omitted = U and V or O (alpha) and 0 (number).

[23] One of 20 alpha and 10 numeric characters in each position.

Appendix 5 – Cabinet decision on the report of the Steering Group on Social and Equality Statistics

Appendix D

Appendix D ***Extract from the Government Decision arising from the report of the SGSES***

Decision sought:

1. The Taoiseach requests the Government to agree to the following:

(a) The publication of the attached Report of the Steering Group on Social and Equality Statistics *Developing Irish Social and Equality Statistics to Meet Policy Needs* and accompanying Press Release.

(b) The development of a Framework for Social and Equality Statistics to capture a comprehensive set of indicators of trends across the main dimensions of life, which will capture social progress or setback. The Framework to be developed by the CSO, under the guidance of the National Statistics Board (NSB) and Senior Officials Group on Social Inclusion (SOGSI) and to focus on the measurement of key outcomes relating to quality of life and on developing the capacity to identify the factors influencing outcomes.

(c) The development of a formal Data/Statistics Strategy within each Department as an integral part of its information strategy. This should be included in its *Statement of Strategy* and be reported on in the annual report. In this context the NSB, supported by the CSO, to develop best practice guidelines within *six months* for Departments for the preparation and implementation of a formal data/statistics strategy.

(d) The CSO to take a lead role in the development of the potential of administrative data across Government Departments and Agencies in conjunction with SOGSI.

(e) To ensure that statistical confidentiality and data protection concerns are met:

(i) the CSO will set out formally how its process of data integration and the subsequent treatment of statistics generated by data integration can be safely employed without data protection problems.

(ii) the NSB and the SOGSI will set out formally how Departments would use and protect individual data available to it for statistical purposes.

(iii) each of these documents will be referred to the Data Protection Commissioner for confirmation that these processes do not undermine the data protection rights of individuals.

(f) To take full advantage of the improved social statistics system, the National Economic and Social Council (NESC) to take the lead role in the preparation and dissemination of a periodic overall Social Report. The first publication of this Report to be completed in advance of the next cycle of Strategy Statements under the PSMA so as to assist Departments in formulating their Statements.

(g) Progress on the development and implementation of the Framework for Social and Equality Statistics to be reported on annually to Government in the annual report of the NSB.

Appendix D

Background

2. At a national level, the system of social partnership and legislation in the Freedom of Information and Equality areas has increased pressure for measurement of the success of national programmes. At an international level, membership of the EU has made particular demands on domestic policy in terms of measuring progress and of meeting new targets and obligations particularly in the social and equality spheres. These developments have substantially increased the demand for statistics and indicators relating to social and equality issues at all levels. Responding to this demand is now a major challenge to public administrations as a whole and to National Statistical Offices in particular.

3. In this context the National Statistics Board (NSB) became increasingly concerned at the implications for the statistical system of the escalating and largely uncoordinated demand for social statistics. In response, in consultation with the Senior Officials Group on Social Inclusion (SOGSI), a Steering Group on Social and Equality Statistics (SGSES) was established to undertake a study to determine the scope of requirements for social and equality statistics and the extent to which these are being, or could be met, by existing data holdings in administrative records.

4. Over a six-month period the Steering Group identified and analysed existing social and equality data sources and data needs through a process of consultation with data producers and data users by undertaking an extensive audit. Following on from this process the group has produced a Scoping Report setting out their conclusions and recommendations.

The need for a vision for Social and Equality Statistics

5. The Report highlights the need for developing an integrated approach to social and equality statistics in the pursuance of a vision which includes:

- A collectively agreed conceptual framework for social and equality statistics, which delivers a comprehensive picture of Irish society and its diversity.
- Systematic identification of data required by the public sector and by citizens both to monitor developments in the essential aspects of life quality and in this context to support policy formulation and evaluation.
- Methods, which deliver the required statistics at high quality, least cost and with due regard for data protection.
- Effective use of social statistics to inform policy and assist planning.

The main conclusions reached by the Report

6. The main conclusions reached by the Report are as follows:

- The process of bringing together data users and data producers across Departments to determine data needs and the potential of existing data was a productive exercise and should be continued within Departments.
- In addition, Departments should also consult with outside stakeholders, including their own agencies, independent commentators and representatives of the Department's customers about the collection and development of key indicators.

- In the context of the public service, effective information sharing involves:
  - Moving from Departmentally-centred thinking to whole-system thinking in regard to information.
  - Providing comprehensive information to meet public accountability needs.
  - The development of the type of framework for social and equality statistics as envisaged in the report to provide the guide for the above processes.
- In order to aid evidence-based policy making, each Department needs to put in place an information/data strategy, which addresses the current and anticipated data needs of policymakers.

Next Steps

Appendix D

7. The Report proposes that the CSO under the guidance of the NSB and SOGSI, should set out a Framework for Social and Equality Statistics and indicators in each domain, and the key disaggregations required of these statistics/indicators. The proposed main domain areas will include indicators such as health and access to healthcare, labour market and working conditions, income, wealth and poverty, education and training and households and families. Progress on the implementation of this framework will be supported by the Senior Officials Group on Social Inclusion (SOGSI) in conjunction with the NSB and will be reported on annually to Government in the annual reports of the NSB. The framework will be of benefit to users, particularly those in policy areas, in allowing them to identify and articulate their needs in a more integrated and comprehensive manner than heretofore. The framework also has the merit of ensuring that the development of social and equality statistics is undertaken in a balanced way across all the domains of interest.

8. Accordingly, as a first step in the process of getting consensus on which indicators really determine whether target national economic and social outcomes are being achieved, the NSB has asked the CSO to prepare a preliminary National Progress Indicators report by Summer 2003. This initial Report will serve as a reference point for discussions between the main users and producers of key economic and social statistics. In this context the following key actions will be required:

   - Each Department should establish appropriate committee(s) bringing together data users and data producers to design and deliver its statistics strategy. The Departmental committees should:
     - Determine how and to what extent the Department's data needs can be met within the Department.
     - Establish what information not internally available is required.
     - Identify the data needs in respect of complex and cross-cutting issues with which the Department is concerned.
     - Identify how the skills of its staff in using data as a tool for policy evaluation and development can be enhanced.
   - A formal Data/Statistics strategy should be devised within each Department as an integral part of its information strategy and this should be included within its formal Statement of Strategy and reported on in its annual report. To the extent that the achievement of this requires the deployment of skilled statistical resources, the Departments involved should actively pursue this in conjunction with the CSO.

- The CSO will take a lead role in the development of the potential of administrative data across Government Departments and Agencies in conjunction with the SOGSI. In particular two actions are essential to tap into the potential data resources at both departmental and agency level:
  - Increased standardisation, coordination and classification of data collection and maintenance to be agreed inter-departmentally.
  - Investigation of the expanded use of common identifiers, such as the Personal Public Service Number (PPS Number) or Postal Codes, if developed.

9. Under national and EU data protection legislation, personal data collected for administrative purposes may be used for statistical purposes provided adequate safeguards are in place to protect the privacy of the individual. Under the provisions of the Statistics Act (1993), the CSO has a general right of access for statistical purposes to administrative data held by Public Authorities and procedures are in place to ensure that statistics published by the Office do not involve any risk of disclosure of individual information.

10. The Group believes that the full potential for administrative records cannot be realised without a link between data sets generated from administrative records and data sets generated by CSO surveys. This potential can more readily be realised through the expanded use of the PPSN. However, in order to ensure that this does not give rise to individual data protection problems it is recommended that:

- The CSO be asked to set out formally how its process of data integration and the subsequent treatment of statistics generated by data integration can be safely employed without data protection problems.
- The NSB and the SOGSI should be asked to set out formally how departments would use and protect individual data available to it for statistical purposes.
- Both of these documents should be referred to the Data Protection Commissioner for confirmation that this process does not undermine the data protection rights of individuals.

Recent developments in relation to the computerisation of the Civil Registration Service (GRO) and the linked issue of the proposal to allocate a Personal Public Service Number (PPS No.) to a child at birth registration will be considered in the context of the development of the Framework.

Dissemination of information on social and equality data

11. It is essential that Social and Equality Statistics and indicators be widely disseminated. The Steering Group Report recommends that, in line with best practice in other countries, consideration should be given to the periodic publication of a social report. In such a report progress, as measured by key social indicators, would be related to the objectives of social and equality policy, on outcomes relating to life quality aspects and would provide important benchmarks of progress over time.

12. Accordingly, it is proposed that the National Economic and Social Council (NESC) should be asked to undertake this work and to ensure that it is completed in advance of the next cycle of Strategy Statements so as to assist Departments in formulating their Statements.