

No. 003/2024

4 January 2024

Our Ref: C32/24

To: All Branches

Dear Colleagues,

Scottish Government - Enhancing The Accessibility, Adaptability And Usability Of Scotland's Homes Public Consultation – CWU Low Level Letterbox Campaign:

Further to LTBs 138/23, 58/23 and 423/22, as detailed in those previous reports, the Health, Safety and Environment Department continues to press forward the Union's Low Level Letterbox Campaign, making representations to central government and the devolved administrations, calling for low level letterboxes to be banned for safety and ergonomic reasons in respect of the negative occupational impact on CWU delivery workers.

Meetings have been taking place, correspondence and lobbying politicians continues and finally a number of public consultations have been responded to covering building regulations, planning policies and home building design standards and guides as governments prepare new legislation to speed up the government's delivery of its commitment to building 300,000 homes a year by the mid-2020s.

Most recently, meetings and correspondence have taken place with Scottish Ministers, MSPs and the Scottish Government's Housing Directorate Building Standards and Technical Policy Lead in relation to progressing the longstanding 'CWU Low Level Letter Box Campaign' aimed at banning low level letterboxes. The all-round response has been positive and supportive.

The Scottish Government last year launched a Public Consultation 'Enhancing The Accessibility, Adaptability And Usability Of Scotland's Homes' which included clauses and questions covering letter box apertures and placement.

The consultation aims to improve housing accessibility through the review of Part 1 of the Housing for Varying Needs design guide and by introducing a Scottish Accessible Homes Standard through updates to building standards and guidance.

A Communication Workers Union (CWU) response has been submitted to the consultation as part of the 'CWU Low Level Letterbox Campaign' in order to place the matter on the record, reiterating our representations, specifically our letter dated 12 July 2022 and Minister Patrick Harvie's reply dated 14 June 2023.

The CWU response to the public consultation centres on the one specific aspect of the consultation in respect of letter box heights and the need for a 'mandatory' standard to be introduced which bans low level letterboxes.

The Communications Workers Union has been campaigning to outlaw low level letterboxes for many years. This issue was first raised by the Union as far back as 1958 when the British Standards Agency deemed it appropriate that letter boxes be at a proper height. Unfortunately, it was not and still has not been enshrined into building standards law anywhere in the UK (Scotland, Northern Ireland, Wales or England).

The CWU has continued campaigning relentlessly for government to implement the specifications now set out in the current European Standard (EN 13724) covering private letter boxes and outlawing low level letter boxes by enshrining the EU Standard into UK Law.

The EU Standard requires letterboxes to be at a height accessible to postal workers, significantly reducing possible injuries such as, dog bites, fingers being trapped or back strain caused when bending excessively to reach ground level boxes.

The European Standard EN 13724 was introduced in 2002 and this states that for 'ergonomic and safety reasons' the centreline of the letter box aperture should be at a height between 700 mm (2 ft. 3.5 inches) 1700mm (5ft 7inches). Unfortunately, it was not enshrined into UK building standards law for some unknown reason.

Low level letter boxes have been outlawed in many European countries. For example, the Republic of Ireland banned all low level letterboxes as far back as 2001.

Scottish Government Ministers, MSPs and officials have continually indicated their support for the regulatory change on letter box minimum height, in line with the CWU Campaign and it's now well overdue that the change is brought into force once and for all.

On the basis of the Minister's assurance and the assurance of the Scottish Government's Building Standards Division Policy Lead, the CWU submission requests that without further delay, the Scottish Government by order, directs that dwellings may not include a letterbox which is less than 70cm/700mm from the ground.

With around 200,000 houses a year, on average, being built across the UK currently, and no regulation on letter box height in place, the problem and negative impact on the occupational health of postal workers caused by low level letterboxes continues to be exacerbated and grows by the day.

The Union has called on the Scottish Government to see merit in minimalizing the risk of injury to CWU members by passing legislation to cover the manufacture of all new and replacement doors fitted to new houses and developments as well as replacements and refurbishments etc.

CWU members in Royal Mail deliver to each of the 31,000,000 UK addresses daily, and the CWU feel the time has come to standardise letter box height and safe design well above ground level.

The problems with low level letter boxes is that back injuries to postmen and women occur each year in Royal Mail and delivering to low level letter boxes at the base of a house front door forces postal staff to stoop to ground level whilst carrying mail items and this can cause back strain. Low Level Letter boxes also present an increased risk of dog bites when the mail is pushed through the aperture at ground level.

Royal Mail postal workers had 18,000 back-related injuries and absence spells in 2021/2022, sustaining back problems connected wholly or in part because of the act of bending and stooping to deliver mail into low level letterboxes. Fingers are also more easily trapped and injured in low level letterboxes, as well as significantly increasing the risk of being bitten by dogs. 2,000 – 3,000 dog attacks on postmen and women occur across the UK annually and

1000 postman and women have had a finger bitten off or partly bitten off in the last 5 years through the letterbox.

The Union has the full support of Royal Mail Group as well as winning the support of many influential bodies and organisations during our campaigning including the HSE, National House-Building Council, the Glass and Glazing Federation (GGF), Local Authorities etc.

With the EU Standard still not enshrined in Building Regulations, CWU has had to campaign 'piecemeal' across the UK, approaching Local Authorities, for support and we have had to lobby House Builders, 'appealing to their better nature' for compliance with the EU Standard, taking account of the negative impact of the installation of low level letter boxes on postal workers.

Our campaigning hasn't been without success and some of the largest of the UK's House Builders have listened to our campaign message and acceded to our request not to fit front doors on homes with low level letter boxes. These include Bovis and Linden Homes, Keepmoat Homes and Coedlas Developments.

A number of Local Authorities have also taken positive steps to support the Campaign, adopting the policy of raising the issue with house builders and developers when applications are made.

The National House Builders Council (NHBC) has been supporting CWU's campaign since 2005.

Turning to the Consultation Clauses and Questions with specific relevance to the matter of low-level letterboxes:

Clause 9.6.9 of Annex I – Section 9 of Part 1 of the current Housing for Varying Needs design guide 'Entrance doors to individual houses or flats.' and in respect of Questions 15 (P39), 40 (P70), 42 (P74) and 44 (P90): The CWU agrees with this proposal but as outlined above, the CWU believes that the proposed updates to the Housing for Varying Needs design guide should go further by firstly (a) Specifically 'prohibit low level letterboxes' and (b) Should specify a mandatory requirement requiring that for 'ergonomic and safety reasons' the centreline of the letter box aperture should be at a height between 700 mm (2 ft. 3.5 inches) 1700mm (5ft 7inches).

See attached copy of the CWU submission to the public consultation.

Yours sincerely



Dave Joyce
National Health, Safety & Environment Officer



Communication Workers Union

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21 December 2023

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Dear Sirs,

Scottish Government - Enhancing the accessibility, adaptability and usability of Scotland's homes
Public Consultation - CWU Low Level Letterbox Campaign:

Further to our earlier correspondence on this matter in relation to the longstanding 'CWU Low Level Letter Box Campaign, this letter is being sent as the Communication Workers Union (CWU) response to the consultation in order to place the matter on the record but repeats our previous representations, specifically my letter dated 12 July 2022 and Minister Patrick Harvie's reply dated 14 June 2023.

My subsequent meeting with Michael Barton-Maynard Scottish Government Policy Lead and Technical Author Building Standards Division, Local Government and Housing Directorate and his response dated 6 December 2023 also refers.

The consultation aims to improve housing accessibility through the review of Part 1 of the Housing for Varying Needs design guide and by introducing a Scottish Accessible Homes Standard through updates to building standards and guidance.

Therefore, our response to the consultation centres on the one specific aspect of the consultation in respect of letter box heights and the need for a 'mandatory' standard to be introduced which bans low level letterboxes.

The Communications Workers Union has been campaigning to outlaw low level letterboxes for many years. This issue was first raised by the Union as far back as 1958 when the British Standards Agency deemed it appropriate that letter boxes be at a proper height. Unfortunately, it was not and still has not been enshrined into building standards Law anywhere in the UK (Scotland, Northern Ireland, Wales or England).

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Best Regards

Yours sincerely



From **Dave Joyce** | National Health, Safety & Environment Officer
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