

Accessible Stadia

Supplementary guidance



Introduction

It is now more than twenty years since the first guidance documents detailing the provision of facilities for spectators with disabilities were published, and twelve years since Accessible Stadia was produced. Much has happened since then in terms of culture change, legislation and demographics, but what remains the same is that sports grounds should be inclusive and accessible to all spectators. Attending sporting activities is an integral and vital part of our culture and tradition, and no one should be excluded on grounds of disability.

With the invaluable support and suggestions of Level Playing Field the SGSA has developed this guide as a benchmark of good practice for new and existing sports grounds, offering practical, clear solutions that will help deliver high-quality grounds with facilities and services that are accessible, inclusive and welcoming for all. The information contained in this publication is intended to provide useful guidance, but is not a definitive statement applicable to all circumstances. Independent professional advice should be obtained before taking any action or from refraining from taking any action on the basis of this information.

Accessible Stadia was first produced in 2003 as a good practice guide to delivering accessible facilities at sports stadiums to meet the needs of disabled football spectators and other users. Alongside a range of International publications (please see appendix – guidance documents and further reading), Accessible Stadia is widely recognised as a minimum standard for designers, access consultants and sports ground management. Since its publication there has been significant progress with changes to equality legislation, the development of inclusive solutions and technologies and raised societal expectations in catering for disabled people. These must all be taken into account in relation to the provision and management of accessible facilities and services at sports grounds.

This supplementary guide does not replace Accessible Stadia, but should be read alongside it. It provides an update in relation to current legislation and good practice, and includes a number of ways in which good design and management of new and existing sports grounds can reduce or remove barriers to access.

Developed with the support of:



The social model of disability

When considering the need to create an accessible and inclusive environment such as a sports ground, it is crucial to consider the social model of disability.

The social model of disability says that disability is created by physical, sensory, intellectual, psychological and attitudinal barriers. The social model identifies solutions to remove these barriers within society, or the reduction of their effects, rather than trying to fix an individual's impairment or health condition.

The social model is the preferred model for disabled people. It empowers disabled people and encourages society to be more inclusive.

In contrast the old medical model provided the notion that disability is caused by an individual's health condition or impairment. This is an outdated model that is disempowering and no longer supported by disabled people or their representative organisations.

It is important to remember that some disabled people face hidden barriers and some may have multiple access requirements but disabled people are limited only by the barriers they face.

It is important to consult with access consultants / experts and both local and national disability organisations and groups when formulating plans for the design and management of sports grounds, and when preparing operations manuals for their use.

Legislation

The Equality Act 2010 (the Act) consolidated and replaced the previous discrimination legislation for England, Scotland and Wales. The Act covers discrimination on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These categories are known in the Act as 'protected characteristics'. As well as consolidating existing law, the Act makes discrimination unlawful in circumstances not covered previously. Different areas of activity are covered under different parts of the Act. Part 3 of the Act deals with discrimination in the provision of services.

The Equality Act says that treatment of a disabled person amounts to discrimination where:

- a service provider treats the disabled person unfavourably;
- this treatment is because of something arising in consequence of the disabled person's disability; and
- the service provider cannot show that this treatment is a proportionate means of achieving a legitimate aim, unless the service provider does not know, and could not reasonably be expected to know, that the person has the disability.

For discrimination arising from disability to occur, a disabled person must have been treated 'unfavourably'. This means that he or she must be put at a disadvantage. Often the disadvantage will be obvious and it will be clear that the treatment has been unfavourable: for example, a person may have been denied a service or given a poorer service. Being denied a choice or excluded from an opportunity is also likely to be unfavourable treatment. Sometimes the unfavourable treatment may be less obvious. Even if a service provider thinks that they are acting in the best interests of a disabled person, they may still treat that person unfavourably.

Service providers can often prevent unfavourable treatment which would amount to discrimination arising from disability by taking prompt action to identify and implement reasonable adjustments. The duty to make reasonable adjustments requires service providers to take positive steps to ensure that disabled people can access services. It requires service providers to anticipate the needs of potential disabled customers for reasonable adjustments.

For service providers, the requirements to make reasonable adjustments comprise:

- where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage;
- where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function; and
- where not providing an auxiliary aid puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.

All sports grounds, new and existing, must comply with this legislation.

The Equality and Human Rights Commission monitors the application of the Act, and legal action can be taken by an individual who may feel that they have been discriminated against. Beyond the world of sport, there are a number of high profile cases that have set a legal precedent for service providers and the need to provide reasonable adjustments to their premises. The Equality Act places an evolving and anticipatory duty on service providers (i.e. sports clubs, stadia management etc.) and sports grounds should ensure that access audits to assess their facilities and services are undertaken by competent parties on a continuing basis in order to ensure current and future compliance with the Act. For all premises, old and new, existing and proposed, management should be developing, or have developed, an "access plan or strategy". This is best done through a thorough access audit by a competent person.

It is important that where football matches and sporting events require segregation of supporters, disabled people should have the choice to be accommodated within their own fan base. Therefore viewing areas should be provided with their fellow fans.

1. Amenity and easy access seating

In addition to the provision of wheelchair user accommodation all stadia should provide an equitable number of amenity and easy access seats for spectators who may require more space. Amenity seats should provide seating with extra leg room and it is helpful to provide some with armrests, although these should be removable. Amenity and easy-access seats should also have backrests.

People with limited mobility may need more room to access their seat using a walking aid or crutches, hence the need for extra leg room. They may be unable to stand easily or for long periods or easily change position. Therefore, amenity seating should provide a reasonable sightline from a seated position that is not obstructed by another spectator standing in front or to the side. A disabled spectator accompanied by an assistance or guide dog may also require extra space for the dog to lie in front of or under their seat. They too should be provided with a choice of amenity and easy access seating.

Amenity and easyaccess seats should be provided in easily accessible areas, such as at the end of rows, where steps are minimised to accommodate spectators with limited mobility. Spectators requiring amenity or easyaccess seats should be able to sit with supporters of their own team in a variety of viewing areas and ticket categories, including hospitality, VIP and directors' boxes. Such seating should also be located close to toilets and other facilities.

The table shows the minimum standards for amenity and easyaccess seating, established by the European Commission and UEFA and Centre for Access to Football in Europe (CAFE) Guide to Creating an Accessible Stadium and Matchday Experience - Access for All. These are minimum numbers only but are based on experience and good practice concerning the number of disabled people likely to want to attend a match or other stadium event. Additional amenity seating should always be provided in hospitality and VIP areas (not included in the quota for general seating areas).

Seated capacity of stand or stadium	Number of amenity and easy access spaces
Under 10,000	Minimum of 6 or 1 in 100 of seated capacity (whichever is greater)
10,000 to 20,000	100 plus 5 per 1,000 above 10,000
20,000 to 40,000	150 plus 3 per 1,000 above 20,000
40,000 or more	210 plus 2 per 1,000 above 40,000

There should be an accessible toilet within 40m of any amenity or easy access seating, with one accessible toilet provided for every 15 disabled spectator seats.

Disabled people should be provided with a choice of accessible viewing areas. In addition, it is important that family members and friends are able to sit alongside disabled spectators who require amenity or easyaccess seating and ticket office staff should be able to provide information about all amenity and easyaccess seating areas within the stadium.

2. Changing Places toilets

Some sports grounds have more recently installed Changing Places or peninsular toilets. A Changing Places toilet offers a larger space with special lifting equipment that can be used by disabled people with complex and multiple needs often requiring the help of up to two assistants.

Installing a Changing Places toilet may enable a disabled person to attend an event who might otherwise be unable to without their assistant having to resort to using the toilet floor for changing purposes.

Changing Places toilets are usually fitted with a fixed, tracked or mobile hoist system so that assistants can fit the user's sling to the hoist and move the person to the various items in the facility. There is also an extended space to accommodate disabled people who may use large, complex wheelchairs such as those with elevated leg rests, a reclining facility or integral oxygen cylinders.

A changing bench should be installed to provide a stable platform that is suitable for changing adults and children. It should ideally be height-adjustable, but can be manually or electrically operated and wall-mounted or free-standing. It should be possible to fix any height-adjustable changing bench at an appropriate, safe working height for assistants, to reduce the strain on their backs.

Such facilities are not designed for independent wheelchair users, and should not replace existing accessible toilets, but enable disabled people with complex needs to attend and enjoy events. As such, clubs should, wherever possible, consider installing a Changing Places or peninsular toilet at their stadium.



3. Accessible services and removing sensory barriers

Accessible services, such as British Sign Language (BSL) interpretation and captioning for hard of hearing and deaf spectators and audio descriptive commentary for partially sighted and blind spectators, are integral to providing fully accessible sporting events.

Partially sighted and blind spectators

Individuals who are blind or partially sighted require clear pathways and signage including tactile surfaces, colour contrasts and non-reflective surfaces, as well as alternative information formats such as Braille, large print, audio recordings and audio-descriptive commentaries. Partially sighted and blind people may be limited by sensory, physical and/or attitudinal barriers.

Hard of hearing and deaf spectators

Individuals who are deaf or hard of hearing may use other forms of communication such as sign language or lip-reading and require services such as interpreters and dedicated text-to-voice telephone relay services. However, many have some hearing and may use assistive hearing devices such as hearing aids and may benefit from induction (hearing) loop and passive infrared systems and visual alarm systems. Hard of hearing and deaf people may be limited by sensory and/or attitudinal barriers.

Learning or intellectually disabled spectators

Learning disabled spectators may require accessible services including information in plain language or easy-to-read documents and websites and clear wayfinding with logical stadium layouts. In addition, stadium staff and stewards need to be sensitive to and aware of their needs, particularly in connection with communication, wayfinding and event day routines. For example, a person with autism may have a preferred event day routine or behaviour that is important to their sense of well-being which can be easily accommodated. Learning disabled people may require a personal assistant or companion and some may request a designated quieter area of the stadium. Learning disabled people may be limited by intellectual and/or attitudinal barriers.

Spectators with mental health conditions

The needs of spectators with mental health conditions on event day should be considered and may include a request for a seat in a designated quiet area of the stadium and /or to be accompanied by a personal assistant. One in four people will experience mental ill health during their lifetime and attitudinal barriers may limit spectators with mental health conditions.

Assistance and guide dogs

An increasing number of disabled people use assistance dogs to assist in their daily living. Partially sighted and blind people may use an assistance or guide dog to help with wayfinding but increasingly assistance dogs are being used to support other disabled people such as dogs that provide early detection of a seizure (for a person with epilepsy) or a hyperglycaemic episode (for a person with diabetes).

Assistance dogs are fully trained to support the disabled person and their life style, which may include attending a live sporting event. As such, disabled spectators with assistance dogs should be welcomed at sporting venues with designated dog relieving stations and easy access seats. Guidance can be found at www.guidedogs.org.uk/media/1488953/Access_sports_08-08-04.pdf

4. VIP and hospitality suites

All areas of the stadium, including the VIP and directors' boxes and corporate and hospitality suites, should be accessible to disabled people, along with any adjoining facilities and amenities. As such, inclusive design principles should be used in these areas and improvements should be made where required to ensure equal access. Wheelchair user spaces and amenity and easy access seating located in hospitality areas should not be included in the quota for general seating areas but should be provided additionally.

5. Access audits and plans

An access audit is the first step to help organisations meet the requirements of the Equality Act. It demonstrates commitment to improving access for disabled people and if used properly can increase custom and turnover and could help clubs to mitigate against claims of disability discrimination.

The National Register of Access Consultants (NRAC) is an independent register of accredited Access Auditors and Access Consultants who meet professional standards and criteria established by a peer review system.

For new developments, an audit should be undertaken during the design and construction stages and should lead to the development of an access statement and development plan. The access audit will assist managers and operators to develop the design brief and, together with their professional design team, make informed decisions from the outset. An access audit can be presented as part of an Access Statement which is part of the necessary documentation and supporting statements at the Town Planning and Building Regulations stages of a development.

Each site or project will be different and may involve an existing stadium that needs to be upgraded or improved (e.g. to remove existing barriers), an existing stadium with proposed extensions or a new stadium. When engaging an access consultant, it is important to have a good understanding of the scope and extent of the services that can be provided, and whether additional services are required such as an access evaluation or appraisal at each design and construction work stage through to completion and handover.

An access audit of existing facilities should include:

- a review of site plans, building plans, sections and elevations of the 'as built' facilities, if available. Off site facilities should be included;
- a review of build dates of facilities, existing access and inclusion management and operational procedures and facility provisions; and
- a review of existing provision and arrangements for public transport, off site car parking and access routes to the stadium.

The auditor should provide a prioritised 'Access Action Plan' or strategy and may include the following areas in the report or plan:

- management responsibilities and actions;
- timescales and possible programme of implementation;
- agreed policies and staff training;
- schedule of identified physical works; and
- list of equipment and product suppliers.

Guidance documents and further reading

There are a range of documents relating to standards and good practice for new and existing stadiums, offering practical, clear solutions that will help to deliver high-quality grounds with facilities and services that are accessible, inclusive and welcoming for all.

British Standards documents

- BS 8300:2009 The Design of Buildings and their Approaches to meet the needs of Disabled People: Code of Practice. ('BS 8300').
- BS 8300: 2009+A1:2010 - Looks at the design of buildings and their ability to meet the requirements of disabled people. Sports buildings are included in this standard and are referenced to the 'Green Guide'. The British Standard recognises one important design principle and that is that any wheelchair user seating area should be designed so that the spectators who use wheelchairs can still see the event where people in front may stand up (BS 8300 Para 11.4.4).
- BS 9999:2008 Fire safety code of practice for the design, management and use of buildings - Provides recommendations and guidance on the design, management and use of buildings to achieve reasonable standards of fire safety for all people in and around buildings. Applicable to new buildings and to alterations, extensions and changes of use of an existing building.

The Building Regulations 2010

- Approved Document M (2004 Edition incorporating 2010 and 2013 amendments) Access to and use of buildings (Part M).
- Approved Document K (2013 edition) Protection from falling, collision and impact.
The guidance draws upon the recommendations of British Standard BS 8300:2009.
- The new edition of Approved Document M has taken the opportunity to broaden the scope of Part M with the aim of fostering a more inclusive approach to design to accommodate the needs of all people. It also makes reference to the 'Green Guide' and to this publication for guidance on integrating the needs of disabled people into the design of spectator facilities. It should be noted that compliance with Part M of the Building Regulations does not necessarily mean compliance with the Equality Act.

The Government's Planning Portal website provides detailed information around the requirements of the planning and building control process and access statements etc. <http://www.planningportal.gov.uk>

UEFA and CAFE Good Practice Guidance to Creating an Accessible Stadium and Matchday Experience – Access for All

A joint publication by UEFA and the Centre for Access to Football in Europe setting out European minimum standards and providing a benchmark of good practice for both new and existing stadiums, with practical solutions that will help football clubs, national associations and stadium managers to deliver high-quality grounds with facilities and services that are accessible, inclusive and welcoming for all. This guide is available in a range of languages.

<http://www.cafefootball.eu/en/access-all>

Sport England Accessible sports facilities "Design Guidance Note" 2010

- This gives advice on the inclusive design, operation and maintenance of sports facilities. It covers specific areas such as entrances, circulation areas, escape routes, changing and toilet facilities, social areas, communication systems and building services.

RIBA Designing for accessibility 2012

- Based on the Approved Document M of the Building Regulations and BS 8300:2009 in the context of the Equality Act 2010. Includes extensive plans and dimensional data illustrating internal and external features that commonly need attention in public buildings.

Technical Report CEN/TR 15913 “Spectator facilities – Layout criteria for spectators with special needs”

- The technical report gives certain design solutions for how a spectator viewing area should be designed for people with disabilities and special needs. It includes specific recommendations for wheelchair users and spectators with ambulant disabilities including visual and hearing impairments. It applies to all spectator facilities including sports grounds, stadia and entertainment venues.

<http://www.cen.eu/pages/default.aspx>

The International Paralympic Committee (IPC) Accessibility Guide - An Inclusive Approach to the Olympic & Paralympic Games

This provides expert guidance and detailed technical information based on tried and tested best practice, to enable the delivery of truly inclusive Games for all stakeholders.

http://www.paralympic.org/sites/default/files/document/130902143349868_IPC+Accessibility+Guide_2nd+EDITION_FINAL.pdf

Olympic Delivery Authority (ODA) Inclusive Design Standards

- This document provided ODA project teams with guidance on the principles of inclusive design they were expected to adopt and the procedures they were expected to follow in delivering them. The document also provides an overview of the current published inclusive design guidance and standards applicable to specific elements of projects and points to ODA standards.

<http://queenelizabetholympicpark.co.uk/~media/QEOP/Files/Public/InclusiveDesignStandardsMarch2013.pdf>

Planning and access for disabled people: a good practice guide

- The primary objective of this guide is to ensure the planning system in England successfully and consistently delivers inclusive environments.
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7776/156681.pdf
- <http://www.visitengland.org/busdev/accreditation/nas/standards.aspx>

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Published by the Sports Grounds Safety Authority

First published 2015