Facilities Report 03

Inclusive Design and Access Statements





Foreword

The National Audit of Scotland's Sports Facilities 2006 found that a large number of facilities will require considerable refurbishment before reaching the end of their useful life. It also found that many of them fail to meet acceptable standards of access for disabled people.

It follows that many of Scotland's facilities will have to be upgraded at some time in the future and that, when this happens, the sponsors and designers behind the refurbishment projects will have to address the issue of disabled access. What's more, standards are changing all the time, for example through legislation such as the Disability Discrimination Act 1995 (as amended 2005) (DDA (2005)).

When tackling these upgrading projects, it is very useful to prepare an 'access statement' which outlines all the issues connected to disabled access. This report tells you how to use an access statement to best effect.

This guidance suggests that there is no "off the peg" solution to designing an accessible facility. However, it aims to set out a framework for designers to follow when faced with challenges such as cost, site constraints, and conflict with governing bodies of sport requirements. Local and regional circumstances may indicate that there is a need for an increase of provision or for an improvement on recognised good practice access standards. Conversely, other circumstances may from time to time suggest that there is actually a justification for less provision than that commonly found in good practice recommendations.

Access statements, if written and prepared correctly, can provide this justification and the guidance looks at the various definitions of an access statement, explains what might be included in the statement (including any deviations from recognised good practice) and suggests a process for involving disability access panels, and representatives from other groups within the community.

Since the introduction of the DDA in 1995, there have been many changes to that legislation. At the same time there has been a surge in interest and some confusion relating to what represents an accessible facility. The phrase "DDA Compliant" has often been misused, and it would be more accurate to say that operators of facilities have an ongoing and evolving duty to ensure that they meet the duties set out in the DDA. This guidance suggests some ways for facility operators to plan ahead by making short- and long-term plans in keeping with the spirit of the DDA.

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01 Introduction

Access statements are important tools for demonstrating the rationale behind design decisions.

If you want to write an access statement, this report is for you. It takes you through the process step by step, to help you accurately reflect the issues in your project. We've also included some imaginary scenarios that may help you to think about your own situation.

Access statements tie in with several **sport**scotland policies. They can help demonstrate a positive approach to equality in sport, which embraces the spirit of The national strategy for sport in Scotland (*Reaching Higher*). Also, they are closely connected with the **sport**scotland *Single Equity Scheme* which promotes a vision for everyone in Scotland to participate in sport, regardless of age, gender, disability, social background, race, sexual orientation, religion or belief.



The main purpose of *Reaching Higher* and the *Single Equity Scheme* is to help develop an inclusive approach. This means that the design approach also should be inclusive, right from the start. An access statement is an important tool to ensure that the project considers the needs of all users. It can then 'evolve' as the design progresses. For example, a good access statement should include details of how inclusive facilities will be managed. Accessible and inclusive sports facilities create an environment where people can realise their basic rights and enhance their wellbeing. If managed and marketed correctly, making a facility inclusive adds value and therefore can make it more profitable.

Athletes with varying abilities and needs can use a facility with great freedom if the physical and operational environment permits it. The benefits of an inclusive environment are not only for disabled people but for the entire community including parents with young children, older people and people from minority ethnic groups. An inaccessible environment that excludes one member of a group (intentionally or otherwise) may exclude a whole family or group. Any design decision affecting an individual can therefore have a significant long-term impact on the group or community as a whole.

To prepare and develop an access statement you need to:

- understand and implement the principles of inclusive design;
- incorporate and respond to the appropriate legislation and guidance;
- consult and involve disabled people;
- amend the access statement throughout the design process;
- understand how a building is managed and know about fire evacuation plans and procedures.

The guidance that follows explains the principles of inclusive design and summarises the key points that are important in the development of an access statement. This report also discusses appropriate involvement and provides a framework for writing the access statement. Legislation and relevant good practice guidance are covered in the Appendix.

Worked scenarios have also been provided throughout to help illustrate instances where a positive and structured approach to access can provide inclusive design solutions.

It should be noted that the legislation and guidance referred to in this document was current at the time of publication. A summary of relevant legislation and guidance has been provided in the Appendix.

02 Inclusive design

Just because a design meets the requirements of some users, it is not necessarily inclusive. Some very accessible yet segregated facilities can have a negative impact by being exclusive and shut off from the company of other facilities.

On the other hand, inclusive design is not solely about disabled people's access requirements; it aims to provide an environment that can be independently used and enjoyed by all people.

Inclusive design (sometimes referred to as universal design) aims to provide people with a choice about how they integrate with others and how they interact with the environment around them. When designers consider inclusive design requirements, it is generally prudent to design for people in most need in our society (outlined in Selwyn Goldsmith's Universal Design Pyramid – see Bibliography). With this approach it often follows that other users of the facility are automatically catered for.



Wheelchairs may only be permitted on some greens, as shown here. However, special buggies are now available to access golf and bowling greens with wide wheels and swivel seats.

Example

A new clubhouse for a small golf club is designed with male and female showers that are not large enough to be used by disabled people. The confined yet open layout of these showers also presents child welfare problems and restricts young people from using them. The club realises that if it provides an accessible "Peninsular" toilet and shower layout, it could be used not only by people with disabilities but also by young golfers requiring discrete space to shower. It is also welcomed by older golfers who have restricted movement. On opening its new facility, the club attracts other activities from the wider community because of the flexible design and in doing so, maximises its bar and catering income. This is an example of inclusive design working to accommodate people with various needs (not necessarily those with a disability).



Inclusive design approach

It is clear that good design is inclusive, and more specifically good design:

- places people at the heart of the design process;
- acknowledges diversity and difference without unreasonable segregation;
- offers choice where a single design solution cannot accommodate all users;
- provides for flexibility in use;
- provides buildings and environments that are convenient and enjoyable to use for everyone.

Choice and flexibility

Inclusive design can assist in breaking down attitudinal barriers that often exist in today's society. Providing choice and a degree of flexibility in a design can significantly enhance a facility in many ways, not only for disabled people but for other users such as school groups, clubs or families.



The designer of this facility has consciously provided a space for accessible bikes to be positioned along a glazed screen for the public to see as a "shop window". This sends out the message of inclusion and creativity.

Whilst not all facilities can provide complete independence, an inclusive approach can help facilitate independent access. A good Access Statement can bridge the gap between the point where independence stops and where support and assistance takes over. It is crucial to the success of a building that design and management should operate in harmony to create an inclusive environment.

In sports facilities, a mixture of both communal and private spaces provides users with choice. This is particularly important when designing changing areas. When separate accessible changing facilities have been provided, the main changing areas should still be accessible as many disabled people may prefer to use the communal changing areas.

Women and also some people from ethnic communities are often discouraged from participating in sport where the facilities fail to provide a choice of both communal and discrete changing. By providing such a choice this again reinforces the positive benefits of accommodating all needs and can often offer the best design solution.



With the exception of one or two minor details this is a good example of an inclusive changing area, with deep padded benches and contrasting grab rails.

The design of these spaces must be carefully considered. Achieving choice does not need to be costly, particularly when it is integrated into the concept design at an early stage.

Managing inclusive facilities

The creation of a truly inclusive environment will involve many people – from building professionals to community groups. Ultimately however, irrespective of the build stages, facility managers must ensure that there are clearly defined structures in place to allow inclusion to happen not by chance but by policy.

To help demonstrate this, section 8 of this guidance includes typical user scenarios. These are intended as a starting point to help develop awareness of an inclusive approach to design and management.

Access and inclusion as sustainable factors

The adaptability of buildings over a long period of time contributes significantly to the sustainability of facilities and supports a society of sustainable communities.

Increasing accessibility will unquestionably bring benefits to the long term viability of a sports facility. Research suggests that there are approximately 11.7 million disabled people in the UK with a combined spending power of approximately £80 billion. According to the Disability Rights Commission in Scotland (now integrated into the Commission for Equality and Human Rights), there are around 1 million disabled adults in Scotland – one in five of the adult population – including people with mobility,

sensory, mental health conditions and learning disabilities. These figures therefore indicate that disabled adults in Scotland have a spending power of approximately £6.8 million.



A well lit pool hall with careful consideration to uniformity of light can enhance definition, tone and chromaticity for people with a visual impairment; it can also add visual interest.

Example

A local sports trust realises that by approaching its marketing policy from a different angle it could encourage use by disabled people and subsequently increase its profits.

The trust also recognises that there is a strong correlation between age and disability.

Therefore, rather than continuing its longstanding policy of depicting images of non-disabled sportsmen and women on its fitness suite walls and in marketing information, it asks its suppliers of fitness equipment to provide inclusive posters and images of a wide variety of users including disabled people showing their prowess in sport.

This move is greeted positively by a large section of the community and encourages more disabled people to use the fitness suite. The result of this is an overall increase in the number of people using the facility who feel comfortable in this environment and subsequently increasing its annual turnover.

Flexibility and adaptability are key to the success of 'future proofing' a building facility.

Planning for future alterations can be integrated successfully in the design of sports facilities if carefully considered at the early stages of a project. This involves taking a strategic approach to design and having a good understanding of sporting trends.

For example, if there is a strong case for doing so, a design team can anticipate the potential for access to be extended to another level of a building by making the space and structure suitable for alteration at a later date. Similarly, measures can also be taken to ensure accessible features can be implemented at a later stage in the life of the building.

Sustainability can only be achieved if management and staff continue to ensure that the needs of users are recognised and understood throughout the life of the facility. It is important that the physical features of a facility continue to be maintained and, if necessary, altered to meet the needs of the community.

The information contained in the access statement should provide the operators of the facility with an audit trail of how decisions have been made in the design process and allow the operator to develop the access statement as a living document.

Example

A small ski club owns facilities constructed in the 1970s which have poor access for disabled people. For example, there is no lift access to the first floor. The club cannot develop unless it widens its teaching programme. It also realises that extending its programme should include adaptive skiing, which is becoming increasingly popular. With careful planning it can provide lessons to meet this demand.

The ski club decides to use its funds to provide an accessible tow travelator, two bi-skis, and an extra store (which could be used for something else in the future). The club calculates that within 5 years it could generate significant funds from this adaptive skiing programme to part-fund an Inclusion Development Officer.

Example 2

Four years on from the example above, the club has thrived with its inclusive programme, The Inclusion Development Officer is working with the club to apply for funds for a new artificial nursery slope and the provision of a lift (formerly occupied by the store). The club also plans to make further adaptations by redirecting money from its inclusive programme back into accessible facilities.

This is a good example of planning ahead, setting targets and being confident enough to alter a facility to meet changing needs.

03 Consultation and involvement

For public bodies, it is now a legal requirement under the DDA (2005) to 'involve' rather than consult end users, including disabled people. Therefore, a much more integrated approach to the design process is required.

The main purpose of involvement is to help the design team or those developing a project to identify the main access issues and the practical impact of the development.

The Disability Equality Duty (DED) requires public bodies to involve disabled people in relevant policies and project development which aims to eradicate disability discrimination. Involvement should be undertaken as early as possible in the design process and be one of active, continuing engagement at all stages of the design.

In the context of this guide, consultation is considered less meaningful because in the past it has not always been a two-way exchange of ideas. Involvement therefore is intended to be more meaningful. It means seeking the views of all building users including disabled people, minority groups, parents of young children and older people, at various stages of the project. This information can then be used to influence the design and can be fed into the access statement. Involving the people who will actually use the facility helps to address issues specific to the local community and the site.

Involvement of end users, including disabled people, is also an important tool for ensuring that an organisation's policies and services are influenced directly by those to whom they are most relevant. It should be regarded as a crucial element in the preparation of the access statement and a necessary and effective way of complementing an access audit or use of guidance.

Keeping 'real' service users and potential users involved enables organisations to:

- target specific groups: for example, the local Access Panel, a local access officer, a group of regular users of a local swimming pool or local occupational therapists;
- know who the non-users are and discover what would encourage them to become users;
- demonstrate lawful practice, particularly with regard to the DDA (2005) and the DED;
- demonstrate commitment to the **sport**scotland Single Equity Scheme;
- establish the main local issues and the practical impact of the development on the local community early on in the project;
- avoid costly alterations at a later stage

It is important that involvement is well planned and that consultees know the level of involvement they will have and what is expected of them. If budget or any other constraints need to be highlighted, then it is important that the design team makes

these clear from the outset. However, this should not be seen as an excuse to lower the level of access. Instead, a more creative and pragmatic approach needs to be adopted.

Involvement is a key part of the design process; however, it should be appropriate to the scale of the project. For example, in a smaller project it may simply be a question of acquiring some informal feedback from existing users, whereas in a larger project, there will be a need for a much wider and more comprehensive level of involvement.

Involvement can be particularly valuable for refurbishment projects, as there may be specific site/building constraints that require a particular design solution to meet the needs of existing users. There are many different degrees of ability and sometimes a compromise may need to be reached which should be justified within the access statement.

We would strongly recommend that disabled people are involved and consulted from concept through to the management of the finished facility. This last stage will be training the staff on disability equality and the BS5588 Part 8.

Scottish Disability Sport (SDS) can assist in the consultation and involvement process. SDS is the governing and co-ordinating body of all sports for people of all ages and all abilities. SDS is a pan-disability organisation that has charitable status and is recognised by **sport**scotland as the lead agency in disability sport in Scotland.

The Scottish Disability Equality Forum (SDEF) is the umbrella body for all access panels and is the first point of contact for all disability access panels in Scotland. SDEF is a voluntary organisation that has charitable status and is generally recognised by most public and voluntary sector agencies as the first port of call to involve disabled people in Inclusive Environments. Under this auspice SDEF has access to a considerable network of disabled people and specialists across the length and breadth of Scotland.

Example

A contractor has been appointed on a Design and Build project for an ice rink. Under the terms of the contract the contractor is provided with an Access Statement which has been prepared up to Stage D. It states that he is required to develop the Access Statement and to involve disabled people in the design and construction of the facility.

A decision is made to construct three full scale mock-ups of the main changing spaces using OSB and other inexpensive materials; some of the mock-ups only require semi-enclosure. Small areas of the wall and floor are fixed with tile samples, grab rails, etc, to create the final impression of the spaces.

The local access panel and the regional wheelchair curling squad are involved. The contractor takes note of their input and makes the necessary changes. The Access Statement is then handed back to the operator of the ice rink to continue developing throughout the life of the facility.

04 Access statements

An access statement provides an opportunity for the project sponsor or client to demonstrate that the project will embrace accessibility and the principles of inclusive design at all stages, including management of the resource when it is completed.

It is **sport**scotland's intention to ensure that all funding applications include an access statement and, wherever possible, influence the use of access statements more widely.

Access statements are sometimes described as 'living documents' which evolve from the concept design stage of a building project through to the completion of the building and beyond into the life and operation of the facility.

At the time of print, access statements are not a statutory requirement in Scotland for planning or building control approval. However, provisions contained within the Planning etc. (Scotland) Act 2006 introduce a requirement for prescribed planning applications to be accompanied by a statement explaining: the design principles and concepts that have been applied to the development; and how issues relating to access for disabled people to the development have been dealt with. Such a statement may relate to either or both design and access. Ministers have powers to set out the form and content of the statement and the range of planning applications where such a statement is required. These requirements will be subject to consultation and are likely to involve disability Access Panels in Scotland.

In any case, access statements help development control and building control with their decision-making, and ensure that the best possible solution for creating an inclusive environment is developed.

An access statement can be used to highlight, for example:

- The desire to innovate, going beyond the minimal regulatory requirements and good practice guidance and demonstrating an understanding of usability and an inclusive approach
- Identifying the benefits of 'future proofing' the building by designing in a degree of flexibility and adaptability such that accessible equipment/facilities can be installed/provided at a later date.

Equally, the access statement may highlight any constraints:

• Trying to apply inclusive design standards to a listed building, where there are structural constraints or where there are genuine health and safety issues.

Understanding local issues and first principles is as important as understanding legislation and good practice guidance. There needs to be a balance between following access standards checklists and understanding how to strategically plan ahead for the future. Preparing an access statement can help to achieve this.

Contrary to some preconceptions, an access statement is not a 'get out' or a means of lowering the level of accessible provisions. Instead, by developing an access statement early in the project, the project sponsor/client and the design team can ensure that good access solutions are implemented early on; and then that costly alterations or additions are not incurred late in the design.

This creates sustainable buildings that benefit not only disabled people, but all users.

What should be included in an access statement

The level of detail included in an access statement will depend on the size, nature and scale of the project. While high levels of detail will not be necessary at the early stages of the design process, the access statement should present a clear methodology of how inclusive design principles will be implemented and maintained throughout the life of the project. The access statement should be considered an integral part of the design process.

A good access statement must:

- be succinct;
- be written specifically for the application and not copied from somewhere else;
- be developed from the beginning of the design scheme to help influence the design;
- explain how the design has come about and what it is trying to achieve;
- include any feedback from involved groups including: local clubs, community; groups, access panels, local authority planners, sports teams, sports governing officials and end users including visitors to the facility;
- include details of any professional advice that has been followed or will be sought;
- use accurate and informative illustrations where necessary;
- describe the project sponsor/client's policy and approach to access with particular reference to the inclusion of disabled people;
- in a refurbishment project, explain what the main barriers to existing access are;
- explain the maintenance and management policies adopted, or to be adopted, relating to accessible features;
- Take into account existing legislation and guidance (refer to section 11 Appendix);
- evolve and develop as the scheme design develops.

Further information that may be included in an access statement as the scheme design develops may include:

- annotated drawings and diagrams where it is felt necessary to illustrate concept designs;
- emergency evacuation plans/strategies any management practice or policies can be picked up in the access statement as it develops. This will include emergency egress strategies for disabled people, preferably developed in conjunction with an Access Consultant and a Fire Engineer or the local Fire Authority;
- an explanation and reasoning for deviation from good practice (if applicable);
- maintenance schedule, for example redecoration, refurbishment considerations and maintenance of accessible equipment relevant to the project at hand such as induction loops, accessible fitness machines and hoists;

- staff training and development linking up with user manuals, attitudinal development, health and safety, and disability equality staff training;
- plans/policies to make continuous improvement;
- provision of adaptable/flexible designs that can be altered in the future if necessary.

What should not be included in an access statement

Below is a list of comments that should not appear in isolation when preparing an access statement.

- "The building will comply fully with the DDA";
- "We have sent out a copy of the plans to some of the religious groups in our area. As we have had no response we have assumed that they are satisfied with our proposals";
- "The building will comply with BS 8300:2001 and amendments";
- "We have consulted with Mums and Toddler groups";
- "The building will exceed the current Building Regulations";
- "We will discuss ideas with access groups only";
- "Whilst we have tried to make the building accessible, compromises have been reached to take account of the site constraints and budget";
- "We have a disabled person on our club committee who is very keen on access issues";
- "As experienced designers of sports facilities, we have a proven track record of access for disabled people and this will be evident in our design proposals".

Although some of these comments are often used with the best of intentions, they do not provide any commitment that the design will develop and that every space and feature will be as accessible as the project allows.

Whilst it is not reasonable to expect a fully detailed statement early in the project, there should be a commitment from client and developer that the statement will develop at all stages of the project.

It is also a common misconception that an access statement is solely for the purposes of identifying "disabled access" rather than providing access for all users. Access statements should reflect that the best possible solutions for creating inclusive environments have been developed.

05 Departing from good practice guidance

The consultation and involvement process may highlight areas where a departure from recognised good practice is necessary. This includes instances where good practice is either exceeded or, especially in a refurbishment project, it is not met. However, this should not be seen as a justification to compromise.

It should be noted that it is necessary for good practice guidance to develop and evolve and this should be supported in the access statement.

The access statement should clearly explain the rationale behind any decision to depart from good practice and provide a clear 'audit trail' for the end user of how the designer has taken consideration of the operational issues.

There are a number of instances when this might occur. Below are a series of scenarios that **sport**scotland has experienced:

Desire to innovate

The architect/designer may wish to apply a degree of architectural license to the design of a space or physical feature. In this case **sport**scotland welcomes innovation but would strongly recommend the involvement of a competent access consultant to ensure that the functionality of the space/feature is not compromised in any way.



Example

An architect decides to collaborate with a product design company when designing a new swimming pool facility.

The team also includes a disability access consultant to develop and provide a bespoke, integrated access system to allow disabled and older people independent access into the swimming pool.

The reason for this is that the existing pool steps are steep and difficult for many people to use. Whilst pool hoists are not required by some disabled people many people prefer not to use them. They regard them as a particularly undignified and often unnerving method of entering and exiting a swimming pool.

A new submersible platform avoids the use of pool hoists and could also be used in other swimming pools.

This is a positive example of the benefits of thinking creatively and innovating to provide a desirable design solution. The result is a system that the local public and pool users are happy to use and that can be used to promote the inclusive facilities available.

Increasing the scale of provision

There are often instances where good practice guidance is exceeded in providing a design solution.

Example

An athletics club which has a well established group of disabled athletes decides that it is necessary to add more accessible toilets, ambulant disabled toilets and changing facilities than required within good practice, because a high number of disabled athletes use the facility.

It also decides to increase the dimensions of door widths well in excess of British Standard guidance all around the facility, and to increase the amount of storage space provided for wheelchairs to take account of racing and sport-adapted wheelchairs.

The increased level of access benefits all the athletes that use the club. Athletes carrying sports equipment find the increased door dimensions particularly beneficial and older visitors are able to take advantage of the additional grabrails provided in ambulant disabled toilets.

Impracticalities of applying good practice guidance

The design may have to deviate from good practice guidance. This is more common in a refurbishment project and should not be seen as an excuse to compromise on access provision. The main reasons for not meeting good practice guidance are due to existing site constraints or when it conflicts with governing bodies of sport requirements.

Example

A school aims to replace its outdoor multi-use games area with a new synthetic grass surface. It also aims to introduce sports activities for disabled pupils and disabled members of the public. However, the pitch is at a much higher level than the changing facilities in the school grounds.

It is impractical to construct a series of ramps with suitable resting places for wheelchair users and therefore, after a period of consultation and involvement from various user groups, the design team makes a rational decision to make best use of the existing vehicular access to the pitch.

The design team enhances this access route by creating safe and level setting down points with hatched areas and signage for groups that may need to access the pitch by minibus. This is clearly explained in the Access Statement and the justification is clearly explained so that management can understand why the design decision has been taken. The Access Statement therefore continues its purpose as a 'Living Document'.

Example

A designer wishes to make a sports hall light and welcoming but also recognises the need for colour and tonal contrast between floors and walls in line with BS 8300:2001.

The BS recommends a 30 point difference of Light Reflectance Values (LRV) between features to help visually impaired people navigate around a space.

A timber floor would have a LRV of around 40 therefore a very light wall colour with LRV of 70 might be needed to achieve a suitable contrast. However this light coloured wall would be unsuitable as it would prevent badminton players from picking out a fast moving shuttlecock.

On careful consideration and advice from a competent Access Consultant, the designer chooses to do a number of things to make the space suitable for playing sports. The reasoning and rationale of the decisions made are clearly explained in the Access Statement:

- reduce the LRV difference to 15 which will allow the wall to be darker and more suitable for badminton players but still providing enough contrast to help visually impaired people to distinguish the floor from the wall;
- choose a wall colour from the opposite end of the colour wheel with different hues as to contrast tonally with the timber floor;
- ensure that light levels in the hall complement the colour scheme and assist both visually impaired people as well as badminton players.

Whatever reason is given to deviate from good practice guidance the following considerations need to be given:

- what is the justification for deviating from the given/recommended standards or good practice?
- what is the reasoning for arriving at the final design decision?
- does the deviation from good practice guidance still ensure that all participants, including disabled people, can participate in the sport?

- can all of the facilities provided still be used in the same way by disabled people as non-disabled people?
- if the design of the facility cannot meet the needs of all users, what management practices will be put in place to ensure that the standard of service is not lowered?
- can features be designed into the fabric of the building to allow future additions/improvements to be accessed when resources become available?

06 The Role of the access consultant

A competent access consultant will have extensive technical knowledge and experience of architectural, design and access related issues connected with disabled people and understand the broader issues of inclusive design.

Unlike the title 'architect', there is no legal restriction on use of the title 'access consultant'. Nevertheless, there are many competent consultants practising in this area. Contact details for access consultants are provided in Appendix A. Access consultants should consider access for all including; disabled people, parents with young children and elderly people.

Increasingly, in developing inclusive solutions for their clients, access consultants are also considering the particular needs of faith and ethnicity which may have similar requirements in terms of access and usability.

In addition to commenting on access issues in the built environment, access consultants are also concerned with management and policy issues including recruitment, service provision, marketing and training.

The access consultant will play a vital role in influencing both the design process and management procedures. Main day to day responsibilities will be commenting on drawings, checking on compliance with good practice for access and inclusivity, and working to influence the accessibility of the design as early as possible to help make cost-effective decisions. A good consultant will advise on integrating physical and management procedures in situations where physical access seems impossible to achieve the best possible solution.

By engaging with the design team at the earliest possible stages, the access consultant can help ensure that the design is an accessible and inclusive facility and reduce the need for costly alterations or additions at a later stage.

In some cases, the appointment of a competent access consultant with experience in the planning system can be extremely useful in guiding developers through the planning process. Many access consultants work according to the 'terms and conditions for the engagement of an access consultant or access auditor' set out by their registration body. The following example highlights the importance of having the input of an access consultant at an early stage in the design process.

Example

A local authority has an existing ice facility with its social facilities situated on an upper level. Access is available to the upper level and a number of disabled people currently make use of the facility. In particular, a disabled curling team use the ice rink regularly for practice and for matches.

The ice rink is being refurbished. The design team considers the number of disabled users and how the facilities can be improved to provide a better service.

While the designers recognise some of the main issues that are likely to be important, such as changing facilities and means of escape, they also recognise the need to employ the services of an access consultant as early as possible. They also recognise the need to involve current disabled users of the facility.

The designers approach a registered access consultant with vast experience and knowledge of sports facilities and sports buildings. The result is a well considered design solution that, because it is implemented early in the design stages, has a minimal overall cost implication. It creates an inclusive facility and an inclusive environment that all users can enjoy.

07 Further practical examples

The following examples demonstrate further that designers need to be aware that wheelchair users are not the only disabled people that will use a facility. There is a wide range of people with varying abilities and needs to consider, including people with sensory impairments, ambulant disabilities, learning difficulties or people with a need for privacy. A number of elderly visitors may also use playing fields; although they may not consider themselves disabled, they may require a little more space and support.

If the number of disabled people regularly using natural grass pitches is low, it is due to a mistaken belief that all disabled people are wheelchair users and that there is no point in creating access to these important facilities. In actual fact, there may be a disabled relative, judge, committee member, visitor or simply someone who takes great enjoyment out of supporting their local team that may wish to get close to the playing area. By providing improved access to a community facility, the facility may now be considered for other community uses such as Gala Days or fundraising events, fireworks displays and so on, where disabled people might arrive with or without a carer.

Scenario one

Craig enjoys playing football and can now visit his local playing field with his helper where there are two extra parking spaces dedicated for disabled people, an improved pathway and an upgraded changing pavilion.

When originally designed and built, there had been no consideration of disabled people's needs at the playing field but the new modifications to the pavilion mean that Craig is not the only person making use of the facility. Being a unisex facility it is also used by keen fans of the local team with impaired mobility, parents and volunteers with small children. It is also used during school sports days by school children using walking aids.

The new upgraded facility allows the disability co-ordinator for the area to plan a development programme around the facility, which is an important resource for disability football and other ball games.



Scenario two

A new equestrian centre is planned to meet the needs of regional and local equestrian development. The project team decides to consult and involve a number of disability access groups and organisations as part of its project development.

The raised judge's box has a set of small stairs and there is discussion among the design team about the need for a lift. The Scottish Equestrian Association estimates that there are only a few judges with a mobility impairment. But some of the consulted groups argue that, potentially, a judge could become disabled and require the use of a lift.

Eventually, the project team decides to provide an area that could potentially accommodate a lift. As an extra measure, the small stair up to the judge's box is made wider to allow the future installation of a short-rise platform lift which can be folded down along the stair. The groups consulted give their approval to the project on condition that the operators of the facility put a staff training policy in place.

This is an example of how to reduce costs at a later stage by envisaging possible scenarios. It also emphasises the different ways in which guidance can be applied. It is not always necessary to provide a totally accessible facility from the offset, but it is important that the future provision for an accessible facility is taken into account.

Scenario three

Fiona (aged 72) has been using her local swimming pool for decades. However, as she gets older, the vertical stainless steel steps are becoming increasingly difficult to use because of the poor slip resistance, the shear drop and the open risers.

She does not wish to use the hoist because she, like many others of her age, does not consider herself disabled and considers hoists an undignified and somewhat frightening way of entering the pool. As a result, she decides to stop using the facility altogether.

Shortly after, during a refurbishment of the pool, local users are asked what improvements they would like in the upgrading of the pool. The community is fully supportive of providing more accessible stepped entry into the pool, which would not only help elderly people but would also help people with children and those who are unsteady on their feet.

Soon after the refurbishment, Fiona takes up use of the pool more frequently than before. The local authority recognises the value of this simple feature and ensures that all of its new community pools will have integrated easy steps built in.

This is an example of how inclusive features can be of benefit to all users.

08 Do's and don'ts

Here are some points for designers to consider as the design process develops.

Do:

- ensure that first principles (the root of the problems/issues) are always soundly understood;
- consult and involve end users as early as possible and in a structured way. Agree on a set frequency of meetings with disability access groups on an ongoing basis;
- appoint a registered access consultant at an early stage (the National Register of Access Consultants may be useful);
- respond to local needs;
- plan for possible future works;
- consider how people of all abilities and from a variety of backgrounds use sports facilities;
- rid the design team of any misconceptions about what disability means and dispel the notion that some facilities are off limits to disabled people. There is a longstanding but false and discriminatory view that some disabled people are not likely to use certain sports facilities;
- use relevant guidance to understand the issues and inform design decisions;
- consult governing bodies of sport, in particular SDS and the athletes on its support
 programmes. SDS athletes have work commitments like anyone else, but they may
 be able to take time out to discuss access requirements if they are contacted well in
 advance. Often, a contribution to an athlete's training funds or to the local access
 group may be welcomed;
- refer to any precedent studies or previous similar projects where access has been successful.

Don't:

- consider that a 'one glove will fit all' approach will work for every situation. Simply
 lifting a standard from recognised guidance may be appropriate in some situations,
 but such a design approach is often frowned on by people and their carers as it
 shows a lack of understanding of what the end user really needs;
- follow an approach that allows accessibility to take over at the risk of not being inclusive. For example, a facility that shouts *"here is where the normal people sit and here is our disabled spectators' viewing area"* is not a truly inclusive design;
- use BS 8300 in isolation. The standard does not cover all aspects, particularly sports provision. It is constantly under review and the design should try to cover first principles as indicated above eg. regional facilities may require larger lifts than normal, facilities for assistance, dogs etc.;
- assume that in situations where a physical standard cannot be met (eg. refurbishment) that nothing else can be done to make the space/physical feature function. By closely working with disabled people and management, there is always a way to make a design bespoke and work well alongside good management;

- introduce design changes without keeping the local access group involved. Many problems with access are often as a result of late changes to the design or poor site inspection from the design team and this can lead to increased costs later on;
- assume that management will do everything that a poor design solution fails to do;
- play one piece of legislation/guidance against the other in an attempt to justify a weak design. This often happens when the issues are only half understood. If there is any conflict between a governing body of sport guidance and access guidance then the issues must be fully worked through to arrive at a sound design solution.



09 Conclusion

It has been made clear throughout this guidance document that the development of an inclusive access statement should:

- be sought at the earliest stages of the design;
- include consultation and continued involvement with end users to address first principles and local needs;
- consider relevant legislation and good practice guidance;
- aim to provide an inclusive environment;
- include competent professionals where relevant eg. inclusive access consultants.

It is clear that different design briefs will have different requirements. However, the broad principle of inclusive design is universal and should be applied to every project.

Access statements will help to ensure that inclusive design is considered as early as possible in the design process. An inclusive design solution can help ensure more people can enjoy the facilities provided regardless of their age, gender, disability, ethnicity or religious belief.

It is important that buildings should be designed to be inclusive and sustainable. It has been proven to make financial sense to design an accessible building from the outset, rather than making costly alterations in the future. Where an inclusive facility cannot be achieved and this has been justified in the access statement, then provisions should be put in place to ensure that future alterations can be easily implemented in future.

Within sports facilities there will be a wide range of people using the facility; therefore it is essential to consider all end users. Each facility will be required to perform specific functions and will therefore have specific design criteria. However, inclusive design should be applied to every project to ensure that facilities are available to the widest possible range of users.

Providing truly inclusive facilities can result in an environment that provides a safe and comfortable place to be used together by everyone.

The access statement encourages developers, architects and designers to think about access in this way, as an integral part of design. An effective access statement will help to ensure that you find the most inclusive and effective solution.

10 Bibliography

Relevant publications

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Colour and Contrast – a design guide for the use of colour and contrast to improve the built environment for visual impaired people JMU Access Partnership, The University of Reading and ICI Paints (2001)

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Sign Design Guide Barker, P., and Fraser, J. (2000))

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BS EN 12193: 2007, Light and Lighting – Sports Lighting British Standards Institution (BSI)

The Good Loo Design Guide CAE/RIBA Enterprises (2006)

Sport England guidance:

- Access for Disabled People, Sport England, 2008
- Changing Rooms and Lockers
- Swimming Pools

The DPTAC Access Directory: The DPTAC Access Directory is a web-based facility, for use by anyone searching for access design guidance. www.dptac.gov.uk

11 Appendix A

Other sources of information Websites:

Architecture and Design Scotland (A&DS) www.ads.org.uk

Building Cost Information Service Ltd www.bcis.co.uk

Building Standards Institution www.bsi-global.com

Capability Scotland www.capability-scotland.org.uk

Centre for Accessible Environments www.cae.org.uk

Centre for the Built Environment www.cbe.org.uk

Changing Places Campaign www.changing-places.org

Chartered Institute of Building Services Engineers www.cibse.org

Commission for Architecture and the Built Environment (CABE) www.cabe.org.uk

Commission for Equality and Human Rights (CEHR) www.cehr.org.uk

Department for Transport, Mobility and Inclusion Unit www.mobility-unit.dft.gov.uk

Disability Rights Commission (DRC) www.drc-gb.uk (now integrated with the Commission for Equality and Human Rights)

Disability Unit at the Department of Works and Pensions www.disability.gov.uk

Fieldfare Trust www.fieldfare.org.uk

Historic Scotland www.historic-scotland.gov.uk

Inclusive Fitness Initiative (IFI) www.inclusivefitness.org

Inclusion Scotland www.inclusionscotland.org

Is there an accessible loo? (ITAAL) www.cae.org.uk/itaalmain.html

National Register of Access Consultants (NRAC) www.nrac.org.uk

Royal Association of Disability and Rehabilitation www.radar.org.uk

Royal Incorporation of Architects in Scotland (RIAS) www.rias.org.uk

Royal Institute of British Architects (RIBA) www.architecture.co.uk

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Royal National Institute of Blind People www.rnib.org.uk

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Royal Town Planning Institute www.rtpi.org.uk/rtpi_in_scotland

Scottish Government www.scotland.gov.uk/topics/people/equality

Scottish Disability Equality Forum www.sdef.org.uk

Scottish Disability Sport (SDS) www.scottishdisabilitysport.com

Sign Design Society www.signdesignsociety.co.uk

Sport England www.sportengland.org

Legislation and guidance

There are a number of key pieces of legislation and guidance that have a major role in the design of inclusive environments and their management. The key ones are:

- Disability Discrimination Act 1995 (as amended 2005)
- Special Educational Needs and Disability Act 2001 (SENDA)
- Disability Equality Duty (DED)
- Planning etc (Scotland) Bill 2005
- Building (Scotland) Regulations 2004 and associated Technical Handbooks 2007
- The Human Rights Act 1998
- Age Discrimination Act 2006
- Race Relations (Amendment) Act 2000
- Planning Access Note 78, the Scottish Executive
- BS 8300: 2001 (including amendment 1) 'Design of Buildings and their approaches to meet the needs of disabled people Code of Practice'
- BS 5588: 1999 'Fire Precautions in the Design, Construction and use of buildings' Part 8 – Code of practice for means of escape for disabled people.
- BS 5588: 2004 'Fire Precautions in the Design and Construction and use of Buildings': Part 12 – Managing fire safety
- Guide to Safety at Sports Grounds ('The Green Guide')
- Single Equity Scheme: Promoting equality of opportunity in sport, 2006
- Reaching Higher Building on the Success of Sport 21 (The National Strategy for Sport)
- The Inclusive Fitness Initiative (IFI)

The Disability Discrimination Acts

The Disability Discrimination Act 1995 (amended 2005) brought in measures to prevent discrimination against disabled people. The DDA (2005) is vested in the individual disabled person who may claim discrimination by an employer or by a service provider and take a case to court.

The Act defines disability as 'a physical or mental impairment that has a substantial or long-term adverse affect on their ability to carry out normal day to day activities', while it also protects those who have had such a disability in the past and may experience discrimination as a result. It also specifically covers anyone who has cancer, HIV or multiple sclerosis.

Physical or mental impairment includes sensory impairments. Hidden impairments are also covered (for example, mental illness or mental health problems, learning disabilities, and conditions such as diabetes or epilepsy).

The Act requires that employers, service providers, educational bodies, public authorities and transport providers in carrying out their functions do not discriminate against disabled people.

Under the DDA (2005), discrimination occurs where:

- a disabled person is treated less favourably than someone else;
- the treatment is for a reason relating to the person's disability;
- the treatment cannot be justified.

In some situations, less favourable treatment may amount to 'direct discrimination' and this cannot be justified.

Discrimination may also occur where:

• there is a failure to make a reasonable adjustment for a disabled person.

The duty to make reasonable adjustments is a cornerstone of the Act and requires service providers to take positive steps to ensure that disabled people can access services. This goes beyond simply avoiding treating disabled people less favourably for a disability-related reason.

The Act is not about ensuring that minimal access is available to disabled people; it is, so far as is reasonably practicable, to approximate the access enjoyed by disabled people to that enjoyed by the rest of the public at large.

The Act does not contain minimal standards to be met. It is important to be aware that there are no established 'compliance standards' associated with the Act and therefore, compliance cannot be guaranteed.

The Disability Equality Duty (DED)

The DDA (2005) introduced the DED to ensure that public authorities are proactive in respect of disability equality issues. The intent is that public authorities build-in equality between disabled and non-disabled people from the outset.

This is not just about physical/sensory barriers but it requires that public authorities give due weight to the need to promote disability equality in relation to all policy and practice including planning, policy making, service delivery, regulation, inspection, enforcement and employment.

The general duty of the DED is that every public authority shall, in carrying out its functions, have due regard to the need to:

- eliminate discrimination and harassment that is unlawful under the Act;
- promote equality of opportunity between disabled people and non-disabled people;
- take steps to take account of disabled person's disabilities, even where that involves treating disabled people more favourably than other people.

It should be noted that the DDA (2005) do not prevail over the legal obligations of listed building consent, building regulations or health and safety, but these obligations cannot be used as a justification for not exploring reasonable adjustments.

The Human Rights Act 1998

The Human Rights Act 1998 came into force in October 2000, incorporating into law the European Convention on human rights. The Human Rights Act needs to be considered to ensure all staff and guests are treated with dignity and respect and they all receive the same level of service.

Building (Scotland) Regulations 2004 and associated Technical Handbooks 2007

The Technical Handbooks provide guidance on achieving the standards set in the Building (Scotland) Regulations 2004 and are available in two volumes, for Domestic buildings and for Non-domestic buildings. 'Section 4 – Safety' recommends minimum levels of accessibility to facilitate the health, safety and convenience of disabled people.

The Disability Discrimination Act (DDA) 1995 and 2005 has a much wider remit than the building regulations, and therefore meeting the regulations does not ensure that duties owed to all disabled people will be met.

BS 8300: 2001 (incorporating amendment 1) is a revision and amalgamation of good practice documents. The design recommendations in this Standard are based on user trials and validated desk studies, which formed part of the research project commissioned in 1997 and 2001 by the Department of the Environment, Transport and the Regions. BS8300: 2001

BS 5588: 1999 Part 8 – Code of Practice for means of escape for disabled people

Management systems can be an essential part of means of escape for disabled people. Part 8 of BS 5588 aims to ensure measures are available that enable disabled people to be assisted to safety in the event of a fire.

BS 5588: 2004 Part 12 – Managing fire safely, provides guidance for building designers and fire safety managers. This part of BS 5588 gives recommendations for the management of fire safety over the lifetime of a building, including guidance for designers to ensure that the overall design of a building assists and enhances the management of fire safety. It also provides guidance on fire equipment and fire safety manuals.

Guide to safety at sports grounds 'The Green Guide' (DCMS 2008)

The fourth edition of the 'Guide to Safety at Sports Grounds' is an advisory document for the safety of spectators at sports grounds. The guide has no statutory force but is the distillation of many years of research and experience of the safety, management and design of sports grounds.

Planning advice note 78 (Scottish Government 2006)

The design based Planning Advice Note (PAN) series, which has followed on and complemented Designing Places, has built up a range of advice on good practice. PAN 78 is concerned with inclusive design and looks at how to improve the design of places so that they can be used by everyone. PAN 78 is targeted at a wide range of people who are involved in the development process and who have the opportunity to create

and maintain inclusive environments. This includes building owners, developers, design professionals, local authority officers, access panels and, importantly, building occupiers.

Single Equity Scheme – Promoting equality of opportunity in sport

(sportscotland, 2006)

The Single Equity Scheme sets out in detail how **sport**scotland will embed equity into our functions, and how we will comply with the Statutory Disability, Gender and Race Equality Duties and help to fulfil the vision for equitable sport.

Reaching Higher – Building on the Success of Sport 21 (Scottish Government, 2007)

Reaching Higher upholds the vision and values of Sport 21: 2003-2007 (the previous National Strategy for Sport) and sets out the long term aims and objectives for sport until 2020.

The Inclusive Fitness Initiative (IFI)

The IFI has been in operation since 2001. The IFI operates around 5 key principles:

- accessible facilities;
- inclusive fitness equipment;
- staff with appropriate training and skills;
- appropriate inclusive marketing strategies;
- the development of alternative inclusive sporting opportunities.

The IFI aims to create not only accessible fitness facilities but inclusive environments that can be used by all participants.

The IFI 'Mark' was introduced in 2006. The mark is designed to benefit both leisure facilities and their customers. There are three levels of IFI Mark accreditation that a facility may aspire to:

Level One (Provisional) – for those facilities that have begun working towards meeting the needs of disabled people

Level Two (Registered) – for those facilities that can demonstrate a good commitment to inclusive fitness provision

Level Three (Excellent) – for those facilities achieving an excellent level of inclusive fitness provision

When facilities have been awarded a level of accreditation a period of six months will be given to work towards the next level if desired.

12 Appendix B

Setting an Access Statement Framework

Setting an Access Statement Framework against the architect's plan of work as developed by the Royal Institution of British Architects (RIBA) and the Institute of Civil Engineers (ICE)

Many of the practices noted below have now been put in place by the Olympic Delivery Authority (ODA) for the London 2012 Olympic and Paralympic Games. (See www.london2012.com and refer to the Inclusive Design Strategy.)

RIBA plan of work stages	Client	Design team	Contractor Also applicable to Design & Build /Management Type Contracts)
A to B – Planning and feasibility	State the underlying philosophy of the organisation – Recognise the impact of legislation eg. 'evolving duty' under the DDA.		Provide Statement of commitment to client demonstrating commitment to accessibility and inclusion for disabled people.
Stage A – Appraisal	Public Bodies should begin to involve disabled people under the DED. Client should have a clear statement of how		
	accessible the facility will be – at this point the statement will be aspirational but clear.		
	Appoint design team members, preferably those who have a record/experience sympathetic to accessibility & inclusion – appoint through access, building journals, interview.	Demonstrate good practice to client and ascertain the degree to which inclusive design can be applied in the project and develop initial accessibility strategic plan.	D&B – Assume client responsibilities where relevant. Contractor's Quality Standards to follow the inclusive process.

	Appoint Access Consultant. Agree frequency of meetings and process for monitoring the design. Establish Client Review process or similar for sign- off of design as it develops – use of 'traffic light' system when any design decision conflicts or falls short of recognised standards.	Access Consultant to work closely with other design team members.	Appoint Access Consultant where necessary.
Stage B – Strategic briefing	Ensure appropriate clauses inserted into appointment documentation – if Design and Build or other procurement routes identify inclusion opportunities as early as possible. Consider partnerships with inclusion groups. Prepare 1st draft of access statement to outline aspirations of project.	Explore initial opportunities for innovation or potential to exceed British Standards eg. movable pool floor. Visit selection of sports facilities that demonstrate good practice.	D&B/Turnkey or management contracts to have inclusive briefing process as part of the design development.
	Develop programming of sport facility to ensure that periods of usage are fully understood. Identify times where participation groups require privacy, full or partial access to the facility.	Design team to translate programming of facility into space and circulation requirements – separate discrete spaces or shared open spaces.	
	Work with design team to agree sport-specific requirements.	Public bodies to meet their duties under the Disability Equality Duty (DED). Begin collecting information.	

C to E – Proposals			
Stage C – Outline proposals	Brief design team to ensure that local access panel has been involved. Consult agencies with technical expertise eg. sport scotland	Organise forum meetings between Access Consultant, occupational therapists and/or local access groups to identify local issues, flexibility.	Understand the main principles of access and inclusion in the project.
		Establish involvement of access groups during specific stages of project.	
	Client to be provided with draft Stage C reports including 'traffic light' reports.	Design team to provide Access Consultant with outline specification and drawings showing disposition of spaces, key dimensions, eg. adult changing facilities.	
Stage D – Detailed proposals	Client to be provided with draft Stage D reports.	Understand competition/training requirements for specific sports, eg. floor markings for adaptive sports.	
		Liaise with planning and respective statutory consultees on specific issues, for example access roads, car parking, setting-down points, external lighting etc.	

Stage E – Final proposals	Client Approval should have disabled stakeholders fully involved in the 'sign- off' stage.	Provide computer- aided design 'walkthrough' of spaces to illustrate the 3-dimensional modelling. Access Statement should now be a fully descriptive document which outlines the main issues of access. Finalise Compliance Reports and agree 'sign-off' with client and stakeholders.	
F - Detailed design and production information	Brief design team on the detailed requirements for each space. Sign-off of room data sheets, etc.	Co-ordinate project information to ensure that all physical features designed with access in mind eg. M&E connections for hoists, wheelchair anchor points for throwing events. Involve occupational therapists, specialists in hearing technology, coaches to gather information on sports equipment, assistive technology, etc. Provide client and relevant stakeholders with	(Relevance to contractor-led projects.) Attend pre-site meetings with design team and client (particularly if design team is novated during later stages). Advise design team on construction issues relating to project. Understand critical and recommended dimensions required which are crucial to the success of the project.

		product information for comment.	
G to L – Contract			
Stage G – Tender documentation	Insist on integrated drawings, specifications and operational procedures for equipment.	Ensure that contractors invited to tender are made fully aware of the commitment to accessibility through the detailed access plan and briefed accordingly to allow for this in the tender.	Identify implications of varying the specification late on in the project. Performance Specifications to be cross checked against good practice.
Stage H – Tender action		Ensure that accessibility requirements are explicit in tender documents.	
	Final approval of schedule of cost savings.	Design Team to ensure that cost savings exercise does not compromise critical access considerations. Re-appraise design, if necessary.	
Stage J – Mobilisation	Agree with design team and contractor the process for providing colour samples, fixture samples etc.	Allow for key stages in contract to re- appraise accessibility.	Quality Standards on site to include Access Statement/access documentation, key contacts for access-related issues.

	Agree with contractor on frequency of occasional site visits from stakeholders/disability groups/representatives.		Sub-contractors to be aware of Access Statement and input required.
Stage K – Construction to practical completion	Where building works take place on existing premises that are still in operation, disabled access to 'working' areas should be maintained during course of the building contract. Handover of building to include key stakeholders' input.	Full scale (1:1) mock ups of key spaces on or off site if appropriate, so that athletes and key stakeholders can experience key spaces at early stages of build.	Health and Safety File, Quality Standards File to be cross- referenced to Access Statement. Full scale mock ups of key spaces where necessary (eg. changing cubicles) using inexpensive materials. Sub-contractors to be aware of Access Statement and input required. Advise local access groups of any changes in the specification or layout. Eg. D&B projects.

Stage L – After practical completion	Post-occupancy evaluation of project (contingency fund recommended to ensure that unforeseen needs can be met). Operator to become familiar with the 'As built' drawings. Commissioning of equipment/controls/systems to be noted in Access Statement.	Access Consultant best placed to conduct the Post- Occupancy Audit to work with the management team of the facility.	CDM including 'As built' drawings, Health and Safety File etc to be passed to client with clear maintenance programme, procedures, contact details, warranties etc.
	Staff training to include any aspects of the Access Statement that relate to operational procedures.		
M – Maintenance	Ensure that ALL maintenance staff and maintenance contractors are provided with the Access Statement as a living document. Planned Maintenance Programme to be linked with Access Statement.	Monitor performance of project over time (where possible) and build the evaluation into future Access Statements.	
	Consider any feedback on building performance and use in preparation for periodic refurbishment.		





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The **sport**scotland group is made up of **sport**scotland and the **sport**scotland Trust Company (National Centres). **sport**scotland incorporates the Scottish Institute of Sport, the high-performance arm of **sport**scotland.



www.nationalcentrecumbrae.org.uk



www.nationalcentreinverclyde.org.uk



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