



Access Audit Report

Location: Courtney Centre, Newton Abbott
TQ12 2QA

Date : 2nd December 2021

Auditor: Nevil Salisbury ~ Rood

Living Options Devon
Ground Floor Unit 3 – 4
Cranmere Court
Lustleigh Close
Matford Business Park
Exeter EX2 8PW

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The Equalities Act 2010

Service providers should treat everyone accessing their goods, facilities or services fairly, regardless of their age, gender, race, sexual orientation, disability, gender reassignment, religion or belief, and guard against making assumptions about the characteristics of individuals.

Service providers also have obligations under The Equality Act, which replaced the Disability Discrimination Acts 1995 and 2005 (DDA) on October 1st 2010.

The following summary information concerns obligations with regard to **disability only**; for full information on the Equality Act visit: <https://www.gov.uk/equality-act-2010-guidance>

The Equality Act 2010 - Disability

The law protects anyone who has, or has had, a disability; people who are mistakenly thought to be disabled; people who are linked or associated with a disabled person. Under the Equality Act 2010 there are a number of forms of disability discrimination:

- **Direct discrimination** - direct discrimination is where a person is treated less favourably than someone else because they have a disability.
- **Indirect discrimination** - this could be when a business applies a policy, criterion or practice in the same way to all individuals, but that policy has an effect that particularly disadvantages disabled people.
- **Discrimination arising from disability** - this means treating a disabled person unfavourably because of something connected with their disability when this cannot be objectively justified.
- **Direct discrimination by perception** - this means a person is treated less favourably than someone else, because someone incorrectly thinks they have a disability.
- **Direct discrimination by association** - this means treating someone less favourably than another person because they are associated with a person who has a disability.

Discrimination arising from disability will not be unlawful if the service provider can show that it did not know, or could not be reasonably expected to know, that the person was disabled. This means that **Service providers should take reasonable**

steps to find out whether someone is disabled e.g., enquire as to whether visitors have any access needs.

Reasonable adjustments

Service providers are also under an obligation to make reasonable adjustments where, if the adjustment were not made, a disabled person would be at a substantial disadvantage compared to people who are not disabled.

What is 'reasonable' will depend on a number of circumstances, including the cost of an adjustment. The Equality Act 2010 requires that service providers must think ahead and take steps to address barriers that impede disabled people. Providers should not wait until a disabled person experiences difficulties using a service, as this may make it too late to make the necessary adjustment.

Requirements for making reasonable adjustments:

- 1. Make 'reasonable' changes to the way things are done** – such as changing practices, policies or procedures where disabled people would be at a 'substantial disadvantage' when accessing goods, facilities and services (e.g., amend a 'no dogs' policy to allow assistance dogs).
- 2. Adjustments involving the provision of auxiliary aids and services** – anticipate what reasonable adjustments you need to make such as providing information in an accessible format (e.g., audio on website or on CD or installing an induction loop for customers with hearing aids).
- 3. Adjustments to physical features** - Consider making reasonable adjustments to the physical features of premises, to better enable disabled people to access goods, facilities and services (e.g., handrails on stairways and steps or ramps for wheelchairs).

A service provider cannot legally justify failing to provide a reasonable adjustment. The only question is whether the adjustment is a 'reasonable' one to make.

Introduction

This Access Audit has been produced by Living Options Devon considering 'Public' accessibility to the Courtney Centre, Newton Abbott.

An Access audit of any buildings can only ever hope to give a 'snapshot' of how a disabled visitor may find their way around the building or surroundings.

Throughout the report, guidance and recommendations have been made using 'Approved Document M, (Access to and use of buildings) [2004 edition, incorporating 2010 and 2013 amendments] unless otherwise stated, all dimensions are in millimetres.

This report has been written following the route taken on the day.

Discussions were had with staff members at the Courtney Centre on the day and any issues they highlighted have been incorporated in the report findings.





Summary of Main Recommendations






- Provide additional accessible parking bays and read mark existing ones.
- Replace existing handrails around site with rails that are easy to grab and of more suitable material.
- A lot of the windows have un-controlled natural lighting flooding in. Blinds need to be employed.
- The platform lift needs to be serviced; it currently operates well but needs good lubrication of moving parts, it is also important that a member of staff is on hand when someone needs to use the lift.
- The accessible toilet needs to be remodelled to ensure it is fully accessible, making sure the alarm cord is in the correct position - with staff trained on what to do in an emergency.
- Improved lighting in lower lobby area.
- Always keep all access routes free of obstruction.





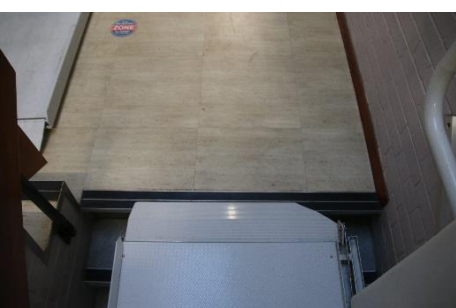
Audit findings and recommendation





Feature or location	Observations	Recommendations
<p>1. Car Parking</p>	<p>There are two accessible parking bays within the car park, one at the top of the car park, adjacent to the ramp leading to the main entrance, the other at the bottom of the car park. Both bays are incorrectly marked</p>	
<p>1.1 Bay at top of Park</p> 	<p>As can be seen in the photo, the bay is incorrectly marked is not level across its length, this will be very difficult for a wheelchair user to use the bay, especially if having to remove a wheelchair from the rear of the vehicle</p>	<p>Re-mark the bay in accordance with the design shown in the appendices. Also consider creating additional bays trying to avoid the slope/gradient</p>
<p>1.2 Bay at bottom of Park</p> 	<p>This bay is also incorrectly marked and has a cross gradient. There are no identifiable routes from the bay to the main entrance, as there is a slope up the car park, wheelchair users and those with limited mobility will have difficulty.</p>	<p>Re-mark the bay in accordance with the design shown in the appendices. Also consider directing disabled visitors to the lower entrance as this is easier to access and safer route from the parking area.</p>
<p>1.3 Additional parking note.</p> 	<p>It is noted that the Kingsteigton Road, running along the top of the centre has double yellow lines.</p>	<p>Although not ideal, disabled passengers could be dropped off here and use the suitable ramped pathway down to the centre, a note could be made of this on any promotional material, it may be worth checking with Devon Highways to see if they can mark out a drop off bay?</p>



Feature or location	Observations	Recommendations
<p>2. Approach</p> 	<p>From the accessible bay at the top of the car park there is a ramped route leading to the main entrance. This has a steel banister, 900mm high, to one side only.</p>	<p>Where a ramped access is provided, handrails should be provided on either side. Ideally these should be nylon coated as steel can get extremely cold throughout winter, making them often painful to use.</p>
<p>2.1 Approach from upper pavement</p> 	<p>The approach from the upper pavement is via ramped access. The gradient is good and should not prove difficult to navigate in a wheelchair. The handrail, for those who need it, is not continuous and its uncoated steel.</p>	<p>It is advised to replace the handrail/s with a continuous rail, having either a wooden or coated steel surface. Handrails should be easy to grip and provide good forearm support for people who are unable to grip. They should be configured with a positive end to reduce the risk of clothing being caught on the ends of rails. (See Appendices)</p>
<p>2.2 Approach via steps from Car Park</p> 	<p>The steps do not have contrasting strips on the front and top faces. The handrails are of the correct height however they are of uncoated steel and have an upright at either end which could cause clothing etc to be caught.</p>	<p>Nosing of contrasting material should be used on the front face as well as on the top of each step so that they are visible when ascending and descending, this should be 55mm wide. Ends of handrail to be designed to reduce the risk of clothing being caught</p>
<p>2.3 Approach via steps from upper pavement</p> 	<p>Same as observations/ recommendations in 2.2</p>	<p>As per 2.2 in this report</p>

Feature or location	Observations	Recommendations
<p>3. Main Entrance</p> 	<p>The main entrance has a good open space before approaching the doors, with a good canopy over the doors. The entrance pad is positioned well, however, on the day of audit it was not working</p>	<p>It is important that the door pad works so that visitors in wheelchairs can access the building, it is also important to keep the entrance free of obstruction.</p>
<p>3.1 Foyer</p> 	<ul style="list-style-type: none"> • On entering the building there is a good level of transitional lighting, however, the windows have no blinds, so light streams through. • There is a good flow through the doors with easy access. 	<ul style="list-style-type: none"> • It may be advisable to restrict natural lighting in the Foyer on sunny days using slated blinds to the windows, which can control the amount of light. • No other specific recommendations other than to stress the importance of always keeping the access route free of obstruction.
<p>4. Room -1</p> 	<p>This room is easily accessed through the door, the layout of the room can easily be adapted to suit the need. The roof light provides good natural lighting but is not controllable.</p>	<p>Good lighting is essential for everyone for visibility and safety. Lighting systems can be used to accentuate interior colour, tone, and texture scheme. Use slated blinds to control natural lighting</p>
<p>5. Room -2</p> 	<p>This room is easily accessed through the door, the layout of the room can easily be adapted to suit the need. The large window lets in lots of uncontrollable light.</p>	<p>Good lighting is essential for everyone for visibility and safety. Lighting systems can be used to accentuate interior colour, tone, and texture scheme. Use slated blinds to control natural lighting</p>

Feature or location	Observations	Recommendations
<p>6. Room 3</p> 	<p>This is a large room, and the layout can be adapted to suit the occupants. There is a large expanse of window to one side which currently has curtains.</p>	<p>The room layout can be adapted from one day to another, it is important to keep plenty of access around the room. Consider replacing curtains with vertical blinds which can control natural light levels.</p>
<p>6.1 Fire Exit from room</p>  	<ul style="list-style-type: none"> • The fire exit door has a double opening, the maximum opening being 1000 mm. There is a small lip across the threshold, but this is well chamfered. • The exit door opens onto a landing 1200 mm² with steps leading to the ground floor, there are no nosing. 	<ul style="list-style-type: none"> • This exit is suitable for ambient people but not suitable for wheelchair users, signage needs to be employed to guide wheelchair users to the most suitable, safe exit. • It is recommended that a high visibility strip [55mm] be used on the edge of each step and around the landing.
<p>7. Room 4 (lower floor)</p> 	<p>This room is easily accessible, with a very adaptable layout offered. As can be seen in the photo the light from the window can cause significant shadows in the room, especially with the mirrored wall.</p>	<p>It is recommended that blinds be used at the window to control natural light. Good use of artificial lighting can help to eliminate shadow areas.</p>
<p>8. Room 5</p> 	<p>This room is easily accessible, with a very adaptable layout offered. The rooflights offer uncontrolled natural lighting. All of the chairs in the room are open and have no armrests.</p>	<p>All-natural lighting needs to be controllable, consider using a combination of blinds and artificial lighting. Provision of seating with armrests will help less mobile visitors lower and raise from seats more easily.</p>

Feature or location	Observations	Recommendations
<p>9. Hall</p> 	<p>The hall is large and can be used for multiple functions.</p> <p>The parquet flooring is in very good condition and provides lots of tonal contrast. There was no evidence of a hearing loop.</p>	<p>It is important to maintain the quality of the flooring tiles which can often become loose.</p> <p>A hearing loop should be installed, or even a portable loop system that can be used/shared throughout the building.</p>
<p>10. Platform Lift</p>    	<ul style="list-style-type: none"> • The platform on the lift conforms to the correct dimensions with the joystick being accessible and easily operated. • Whilst operating up and down the platform made a lot of squeaks and groans. • The lift descends from good levels of light into a darker surround. • The landing strip/edge of the lift can be difficult to spot, especially in low light conditions. 	<ul style="list-style-type: none"> • Although designed to be operated independently, it should only be used when users can be instructed in their safe use and under management supervision. • This can be overcome with some good maintenance i.e., lubrication of the rails and joints. • Good lighting is essential, and it is advised that lighting is used to illuminate the area when the lift is in use. • Consider employing some high-viz strips around all of the lift, this will help people navigate the platform safely.

Feature or location	Observations	Recommendations
<p>11. Lobby, lower floor</p> 	<p>As seen in the photo, the lower lobby is quite dark, with the natural lighting from the door flooding in, creating lots of shadows and dark areas. This can be very confusing for people with limited vision.</p>	<p>All lighting, including natural light, should be controllable and adjustable where possible to suit the needs of the individual. Passive infrared sensors could be used to detect dim light and activate booster lighting.</p>
<p>12. Accessible Toilet, upper floor</p>   	<ul style="list-style-type: none"> • The current layout of this toilet is not suitable as the wash basin is too far away from the WC. • The emergency alarm cord is in the wrong place. • There should be two grab rails at the wash basin, the baby change platform currently prevents this. 	<ul style="list-style-type: none"> • Please consider re-designing the whole layout of toilet, See appendices for further guidance. Further information on request. • The alarm cord needs to be in very close proximity to the WC, with the bottom of the cord 100mm from the ground. • Look into re-siting the baby changing platform and providing an additional grab rail.

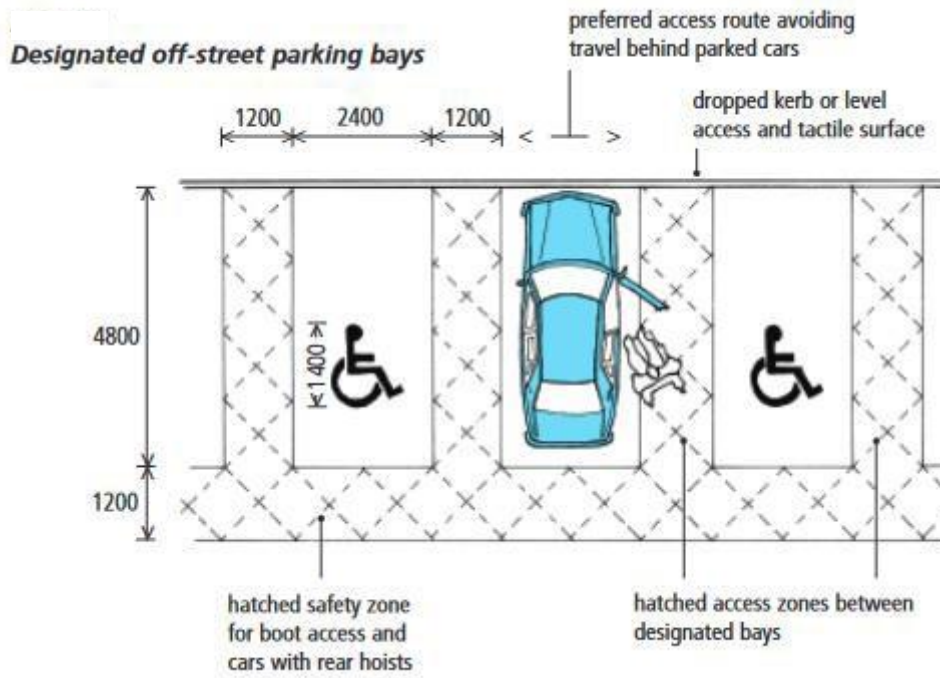
Feature or location	Observations	Recommendations
<p>13. Accessible Toilet, lower floor</p> 	<ul style="list-style-type: none"> The toilet is well laid out, although the size is small. There is not enough clear space on the transfer side to make it fully accessible. This type of door lock is not suitable for use. It is very difficult to operate and will be very challenging for people with limited dexterity. 	<ul style="list-style-type: none"> This should not be recommended as a fully accessible toilet, but rather, a toilet for ambient disabled people, as there are sufficient handrails to use. Please see appendices for details of more appropriate ironmongery to use.
<p>14. Access to rear of lower floor.</p> 	<p>This path leads to the rear of the lower floor, to the side of the fitness studio. The turn at the top of the ramp – as indicated – is not suitable for a wheelchair as the turn is too great.</p>	<p>This could provide an additional entrance / exit for ambient visitors. If it is, signage should be employed to indicate not accessible for wheelchair users, with directions to suitable access point. If it is to be used, consider replacing handrail with more suitable material.</p>
<p>15. General use WCs</p>	<p>Although not specifically checked as part of this audit, the gents and ladies are all well laid out and provide suitable use. There is a lack of handrails in the cubicles.</p>	<p>Although not specifically required, the addition of well-placed handrails will be of benefit to users who have difficulty lowering and raising from WC.</p>

Floor Plans



Appendices

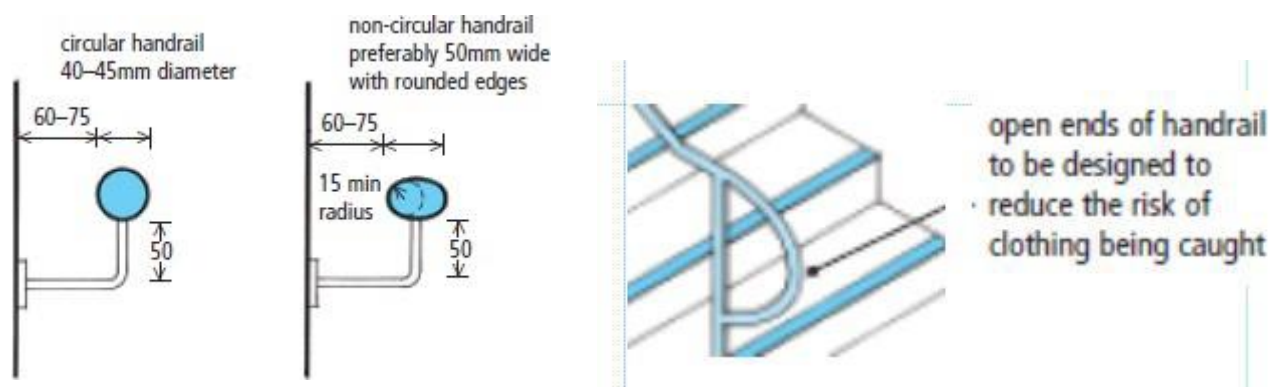
Car Parking



Example of on-street parking bay

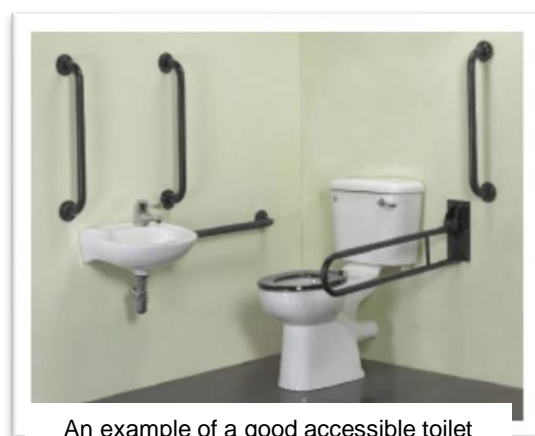


Handrail profiles



Accessible Toilets

Accessible toilets are useful for a broad range of people who are either permanently or temporarily disabled. All accessible toilets should be designed in accordance with BS8300 and Part M of the Building Regulations. The following information explains why it is important that the regulations are followed - what may appear to be a small and insignificant detail to some may pose a real element of difficulty or even danger to a disabled person (not only wheelchair users).



An example of a good accessible toilet

of

be

Standard height toilet pans are unsuitable: The seat of a standard wheelchair is approximately 480mm above floor level. Standard toilet pans are around 430mm to the top of the seat. It may be possible to slide off of the wheelchair and drop onto the toilet seat. Getting back onto the wheelchair is much more difficult.

The basin needs to be close to the WC: Some disabled people need to wash their hands first before rearranging their clothing and transferring back to their wheelchair so the basin should be easy to reach and use from the toilet.

The flush handle should be on the side nearest the transfer space: The flush lever should be on the open side of the cistern (not on the wall side). You should be able to

flush it using a hand, an elbow, or any other part of the body. Some people do it with their chin. If it is not on the open side, it will be impossible to reach from a wheelchair.

Toilet tissues is preferable to toilet paper: Some people can only use one hand, which can make the job of tearing sheets of paper off of a traditional toilet roll quite difficult. A toilet tissue dispenser, fitted in the correct position can make life much easier for everybody.

The type of rail is important: The fold down rail should be easy to pull down and push up from a seated position. Some rails lock into the upright position and have to be physically lifted before they can be lowered which is not easy, for even the most muscular and agile of us, especially whilst sitting on the toilet with our back to it. Drop-down rails are available with a friction hinge, so that they can be adjusted to fold down effortlessly, without them falling down uncontrollably.

Access to the cubicle: One of the most important points often forgotten is that none of the facilities described above are of much use unless physical access to the compartment is good. All of the following points are vital:

- Sufficient manoeuvring space outside the door to the WC – 1.5m x 1.5m should be regarded as the minimum.
- The door should preferably open outwards, but it should be positioned carefully so that it does not obstruct a circulation route or inconvenience other users of the building.
- Door furniture needs to be able to be used by people with limited dexterity or strength. It may be useful to ask whether it can be operated with a closed fist.
- The door furniture must also contrast with the door for easy recognition



An easy-to-use combined door latch and lock

Additional Facilities needed in the cubicle

- A mirror located either above the wash basin or on the opposite wall to enable people to see themselves in the standing or seated position.
- A shelf located between the basin and WC to hold a colostomy bag.
- A disposal bins

Easy to Read and Accessible Information

Use plain bold fonts without serifs such as Arial Bold, Tahoma Bold, Helvetica Bold and Comic Sans. Keep all text the same style and size.

- Produce information in 14 points as a normal standard and 16 points for large print versions. If space allows, many more people will find 18 point easier to read.
- When producing written material for an individual with visual impairment you should ask them what size text they prefer.
- Keep information concise and to the minimum – less writing means less effort for the reader and more likely that it will be read at all.
- Use plain English avoiding long words and jargon. When using acronyms give full version in the first instance – plain English will be understood by many more people.
- Always write in short paragraphs with a double line spacing between each line and paragraph – small ‘bites’ of writing are easier to follow.
- When creating an index put the page number before the item which is much easier to follow and avoids the use of dotted lines which are not helpful. Remember page numbers need to be big and bold too.
- Using bullet points and isolating text in a box are effective ways of highlighting main points and important information. Bullet points should be solid and box lines bold.
- Forms and questionnaires should allow extra space for written responses. People who read large print often write with felt pen and even bigger than the printed large text. Tick boxes are best placed before the question and also should match size of text.
- Black print on pale yellow, cream or buff paper creates more comfortable reading - white paper reflects the light back at the reader. Give consideration to good contrast when using coloured paper. White or pale-yellow text on dark paper also works well.
- Reflective material can create confusion - avoid glossy finishes - use matt pouches when laminating and a satin finish where stronger material is needed.

Signs are a ‘physical feature’ of a building and covered by the Equalities Act

Heights of signs

- Room identification signs should be placed on the wall immediately next to latch side of door (too little wall space, on door itself).
- **Room identification** signs placed at same height throughout site = between **1400** and **1700** mm
- Overhead signs hung at **2300mm** (lowest edge) from floor.
- **Wall mounted** signs should protrude no more than **100mm**.
- Tactile signs **1400 --1700mm** from floor.
- **Tactile** control panels **900 -- 1200mm** from the floor.

Tactile Signs

- Should be embossed and not engraved.
- Should be raised from surrounding surface by **1 – 1.5mm**
- Stroke width **1.5 – 2mm** for a **15mm** letter height, (both sides of letter can be felt in one pass of the finger).
- Should not have sharp edges.
- Must be sans serif font (plain style).
- Should be inclined at **45 – 60 degrees** from the horizontal (tactile reading at a more natural/comfortable position).

Lettering Size Relating to Distance Recommendations

- **Long Distance** such as building entrances **150mm** minimum.
- **Medium Range** such as direction signs in corridors **50 – 100mm**.
- **Close Range** such as wall mounted information signs **16-25mm**.
- **Symbols** should be at least **100mm** in height overall.
- **Embossed** (tactile) letter/numbers **15mm** minimum height

Contrast

- The colours of signs should contrast well with:
- Signboard and background (bricks, stone, vegetation).
- Signboard and text/symbol placed upon it.
- Ideally the contrast between signboard and environment should be **70%**.
- The sign finish should have a gloss factor of no more than **50%** or be matt.

TIP: The contrast between colours can be effectively checked by reproducing in black and white (take a black and white photocopy of a colour photograph).

Borders

- The **thickness** of a border – **10%** of the **lower-case letter height**.
- Adding contrasting borders is an economical way of enabling the same colour scheme of signs to be bulk purchased/produced, which will ensure all signs contrast with all environments.

Minimising Glare

- Use materials with a matt finish.
- Do not suspend signs near a light source (windows, ceiling lights).
- Do not place signs on external glazing.
- Do not use illuminated signs.
- Do not use signs with white backgrounds.

Language

- Should be consistent throughout site (always 'Toilets' and not 'Toilets' on one floor and 'WCs' on another).
- Avoid abbreviations as they can be easily misinterpreted and should be used as little as possible.
- Omit full stops between titles and initials
- Information should be concise and minimal.
- Avoid long lists on one sign.
- A mixture of capitals and lower case is much easier to read.
- Start each key word with a capital letter and following words all lower case.

Symbols

- Added to signage provide quick and easy recognition.
- Helpful to visually impaired, and people with learning difficulties,
- Helpful to visitors from other countries and ethnic language communities.
- Must be simplistic, immediately recognisable.
- **Must be large, bold** and in good, contrasting colours



The recognised symbols relating to disabilities

Arrows should be:

- Bold and the same thickness throughout the symbol.
- The main stem should be longer than ends of point.
- The ends of the point should be parallel and not cut off at 90 degrees.



Correct



Incorrect

- Arrow location should correspond with direction.
- Arrow should be ranged to location side of and be close to text.
- Use only one arrow for several areas in same direction on same sign.

Braille

In the UK about 19,000 people use Braille regularly. It is a system made up of patterns of 6 dots allowing 63 possible combinations which correspond to individual letters, numbers, punctuation marks, letter groups and full words. It does not differentiate between capital and lower case and is read with the pads of the fingers, and not the fingertips.

Grade 1 Braille

- Transcription, which is the first learning to reading Braille. (Because it is bulky it is replaced by a contracted form).
- It should only be used for single word signs or short information e.g.:

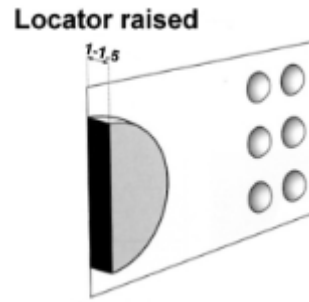
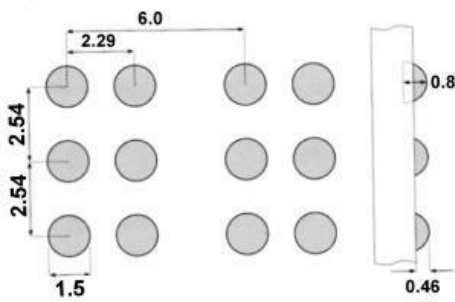
‘Reception’ and ‘Push Up Bar To Open’

Grade 2 Braille

- Consists of contractions added to the dot combinations to represent common letter groups and words e.g., ‘the’ and ‘for’.
- Although contracted, it is still bulky – **1 A4 printed page** will take approximately **two and a half pages** when reproduced in grade 2.

Grade 2 Braille should:

- Be used for longer information signs.
- Instruction signs.
- Books, magazines and leaflets.
- Have rounded dots
- Be located below text and arrow
- Be ranged to the left of signs
- Have no raised edges or frames on signs to obstruct hand movement.
- Have a locator on left hand edge.
- Locators should be 6mm tall and 3mm wide.
- Locators should be raised or recessed by 1-1.5mm.



Useful Contacts

<p>Equality and Human Rights Commission: Equality Advisory Support Service 0808 800 0082 www.equalityhumanrights.com</p>	<p>Provides advice and guidance on rights, responsibilities and good practice, based on equality law and human rights including disability discrimination.</p>
<p>Royal National Institute for Blind People (RNIB) 0303 123 9999 www.rnib.org.uk</p>	<p>The leading charity offering information, support and advice to almost two million people with sight loss. Offer information about designing accessible environments, such as signs, maps, buildings, streets, websites and packaging and products.</p>
<p>Action on Hearing Loss Telephone: 0808 808 0123 Textphone: 0808 808 9000 www.actiononhearingloss.org.uk</p>	<p>Action on Hearing Loss is the new name for RNID. The experts in providing support for people with hearing loss and tinnitus.</p>

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Barker & June Fraser**

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publishing@rnib.org.uk

Disclaimer

Living Options Devon's Access Auditors have been trained by accredited Access Consultants and carry professional indemnity insurance (details available on request).
They are not qualified surveyors.

The advice they give is based on their experience of living with a disability in an inaccessible environment and is given in good faith.

Specific recommendations follow the guidelines laid down in Part M of the building regulations and comply with the Equalities Act.

This information is correct at time of printing.