



**CPFC
ACCESS
STRATEGY**

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This Statement has been produced in accordance with clear print guidelines, but is available in alternative formats, including large print and Braille.

EXECUTIVE SUMMARY

At Crystal Palace Football Club (CPFC) we recognise that the built environment has a fundamental affect upon people's lives and that access to public places and the environment begins from the moment you leave your front door. We strive to ensure that all supporters, staff and visitors feel confident working and visiting our Selhurst Park.

CPFC recognise that inclusion is an evolving and an integral part of the whole process of the design, construction, management and maintenance of buildings and public space environments. We are committed to continue to monitor revisions to legislation, design guidance and developments in expectations providing accessibility for all people, including those with mobility, sensory and cognitive impairments to meet our obligations and user expectations, wherever reasonably possible.

CPFC have a number of initiatives to promote inclusion in its broadest sense and will endeavor to progress.

Ideally everyone, regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion, belief, sex or sexual orientation should be able to use a building and environment. Groups of people traditionally excluded from many activities and opportunities can readily be included with consideration and awareness. This strategy is the first step in that process, the decision-making process providing an audit trail for the process and the means to ensure that inclusive access is maintained wherever reasonably possible.

This strategy will identify the philosophy and approach to inclusive design adopted, the legislative background and the key issues in the use, management and maintenance of the stadium. The physical limitations, age, shape and size of the site, including the internal and external levels, may impose challenges in terms of accessibility, however, there is a commitment to make the premises as accessible as reasonably possible, within the current guidelines.

As a Club, we will cater for a wide variety of user needs and will aim to maximise inclusive use. The obligations of reasonableness introduced by the Equality Act 2010 (The Act) and subsequent legislation and guidance have been and will continue to be addressed throughout the building changes.

The strategy will address any anticipated departure from inclusive design guidance in terms of the constraints of the site, set out the reasons for departing from guidance and the rationale for the design approach adopted. Any alternative management solution proposed will achieve at least an equal and more convenient outcome than existing, in accordance with the Building Regulations Part M (ADM).

This document will be continuously reviewed and updated.

LEGISLATIVE BACKGROUND

Three primary pieces of legislation have the most influence, namely, the Equality Act (EA), the Regulatory Reform (Fire Safety) Order 2005 (RRO) and the Special Educational Needs and Disability Act (SENDA) and to a limited degree, the Human Rights Act (HR) 1988. The Equality Act 2010 replaced a number of Acts including the Disability Discrimination Act 1995.

Government figures in 2014/5 indicate that there were 12 million disabled adults in the UK and over 900,000 disabled children. Under the Act we have a duty at large to reasonably predict and cater for the needs of disabled people.

It is essential that CPFC adopt a strategy to implement suitable measures proportionate to the nature of services, business plan and available budgets, within reasonable timescales.

Anti-discrimination legislation

Equality Act 2010

The Equality Act 2010 (EA) brought together separate pieces of legislation into one act including the Disability Discrimination Act which had been in existence since 1995. The EA requires reasonable measures and has an anticipatory duty. It must be borne in mind that the EA is a civil rather than building led legislation; it is the activity that falls under the EA, not the building. Furthermore, there are no technical standards that apply; nevertheless, adherence with the legislation is obligatory. A building or environment either enables or disables a person from accessing services, education or employment. The club has responsibilities as a service provider, educator and employer.

The reasonable adjustments under the Disability Discrimination Act will be familiar; the Equality Act has the same objective but deals with it in a slightly different manner.

CPFC are required to take reasonable steps to:

- Where a provision, criterion or practice puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
- Where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
- Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

However, failure to make a reasonable adjustment cannot be justified; the issue is whether or not, the adjustment is reasonable and this ultimately will be decided by the courts. It is therefore important to review policies, practices & procedures and premises.

A service provider must take reasonable steps to provide auxiliary aids or services to remove the disadvantage experienced by disabled people and to have in place contingency arrangements in case of an unexpected failure of an auxiliary aid.

Examples include:

- A special piece of equipment;
- Extra staff assistance to disabled people;
- An electronic or manual note-taking service;

- Induction loop or infrared broadcast system;
- Assistance with guiding; and
- Telephone services to supplement other information.
- When considering making reasonable adjustments the following steps should be taken:
 - Premises
 - Planning in advance for the requirements of disabled people and reviewing the reasonable adjustments in place;
 - Conducting access audits on premises;
 - Consultation
 - Asking disabled customers for their views on reasonable adjustments;
 - Consulting local and national disability groups;
 - Drawing disabled people’s attention to relevant reasonable adjustments so they know they can use the service;
 - Management and operations
 - Properly maintaining auxiliary aids and having contingency plans in place in case of the failure of the auxiliary aid;
 - Training employees to appreciate how to respond to requests for reasonable adjustments;
 - Encouraging employees to develop additional serving skills for disabled

people (for example, communicating with hearing impaired people); and ensuring that employees are aware of the duty to make reasonable adjustments and understand how to communicate with disabled customers so that reasonable adjustments can be identified and made.

Employment

Duties under the EA refer to individuals and any reasonable adjustments will relate to their personal circumstances. Actions required under the EA will be met by measures through the CPFC Human Resources Department.

Service delivery

Any service provided at a cost or free of charge is included. The service provider has a duty at large, in that, there is a responsibility to anticipate the needs of service users and to modify any elements that might create discrimination. Liabilities are also vicarious, in that, the club would be held responsible for any breaches of the Act brought about by any member of their staff.

The legislation does not override any statutes or consents in respect of Planning, Construction, Conservation or Health and Safety. There are no performance standards under the EA and it cannot in effect be complied with, rather, it is essential to address one’s duties in respect of its obligations.

Protected characteristics

The act makes it unlawful to discriminate against a person with one of the nine protected characteristics;

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;

- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex;
- Sexual orientation

Disability and discrimination definitions

The EA states that a person is disabled if they have a physical or mental impairment and it has a substantial and long-term adverse effect on their ability to perform normal day to day activities.

One in four families includes a person with a disability. People with disabilities include those who use a wheelchair, ambulant disabled people with mobility impairments, those with sensory impairments including visual and hearing, and people with learning difficulties and cognitive disabilities.

The number of people who regularly use a wheelchair is proportionally quite low and represents 6-8% of disabled people. A larger proportion will have mobility impairments relating not just to limb damage but also to other physical or medical conditions. Travel distance from points of arrival, choice of terrain and the strategic distribution and appropriate design of amenities will be crucial to the safety and convenience of many.

Visually impaired people are a proportionally large component of those with disabilities; there will be wide-ranging symptoms and degrees of loss associated with the restriction to their sight. Many can make out shapes and contrasts in colour or tone supplemented by other clues within the environment. Most will rely heavily on their other senses, especially hearing and touch. However, only four per cent of registered blind people have no sight at all. Wayfinding and protection from hazards are necessary considerations and the availability of communication and information in appropriate media is essential.

Many deaf or hard of hearing people have difficulty hearing sounds clearly or screening out background noise; however, most are not registered deaf or hard of hearing. Like visual impairment, the incidence of hearing impairment within any given population will increase with age. There is a requirement to provide sound reinforcement facilities for the hearing impaired, interpretation services for the profoundly deaf and communication in appropriate media.

How people with learning difficulties understand information and find their way varies widely. If communication and wayfinding systems are consistent, use simple terms or pictograms, have prominent landmarks and easy-to-follow directions, everyone will find it easy to get around.

People with cognitive impairments may feel intimidated by other people or the environment adding to their level of anxiety. In addition to clinically recognised conditions, a very large number of people suffer from panic attacks and compulsive behaviour disorders.

The Act states that a person is disabled if they have a 'physical or mental impairment and it has a substantial and long-term adverse effect on their ability to perform normal day to day activities.'

A person discriminates against another if a provision, criterion or practice affects any of the protected characteristics, including disability, age and race. It is unlawful to treat a disabled person less favorably than others are, or would be treated for a reason connected to their disability. It is not discrimination against a non-disabled person if a disabled person is treated more favorably. There is a new concept of discrimination arising from disability. The Act makes it unlawful to treat disabled people less favorably in employment opportunities, education, transport, and in the provision of services, goods and facilities without lawful justification. The duty applies to the provision of services, including the management of buildings.

Charges

Organisations and people subject to the reasonable adjustment duty are not entitled to require a disabled person to pay for any costs connected with the duty.

Enforcement

The EA duties and guidance had staggered enforcement dates from October 2010. Legislation is evolving and is updated regularly, particularly by test cases in the courts. The legislation will be monitored and updated in this strategy as required.

This strategy will clearly demonstrate how the building occupiers are considering legislative obligations in terms of service provision and employment. It offers an opportunity to achieve the highest quality outcome for everyone. It should not be considered a static document. It is intended to be a living document which will ensure the reasonable provision of access to and use of the building, facilities and surroundings to as many members of the population as can reasonably be achieved.

Special Educational Needs and Disability Act 2001 (SENDA)

Education providers since the introduction of the Act in 2002 have been required to ensure equality in all of their activities to safeguard disabled students against discrimination.

Human Rights Act

The Human Rights Act consolidates and provides a philosophical context within which the Equality Act may be interpreted. For instance, Article 3 introduces Freedom from degrading treatment; Article 8 the Right to respect for private and family life; Protocol 1, Article 2 provides a Right to education; and Article 14 Freedom from discrimination.

Regulatory Reform (Fire Safety) Order 2005

This applies to England and Wales and covers general fire precautions and other fire safety duties needed to protect relevant persons in case of fire in and around most premises.

There is guidance available on the required risk assessments for large places of assembly and disabled people. Within the RRO; section 46 is concerned with the evacuation of disabled people and provides advice as to the areas of consideration.

PHILOSOPHY

Crystal Palace Football Club are committed to ensuring a policy of equality, inclusivity and accessibility for all, recognising the diverse nature of our supporters, staff and visitors. We accept the social model of disability and that people are not a homogenous group; we are all individuals with needs and aspirations.

The Club endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in the club will have a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities and can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular, are able to enjoy their engagement at the club without the threat of intimidation, victimisation, harassment, bullying and abuse.

As well as complying with legislation, we promote equality by taking positive steps to counteract the effects of physical or cultural barriers, whether real or perceived, that restrict the opportunity for all sections of the community to participate equally and fully. CPFC will therefore seek to institute, support or contribute to appropriate measures or initiatives that enable access to our club, as well as require participation in associated activities by people from any group that is under-represented in the club or has difficulty accessing it.

Accessibility is both the physical and attitudinal, we aim to provide a safe and welcoming environment that all people are confident using and do so intuitively.

Employers, volunteers and service providers

As service providers and employers CPFC aim to assess the manner in which services will be provided in accordance with the requirements of the EA and other criteria set out in the document list detailed later in this statement.

This statement will be linked with recruitment, employment and volunteering policies and procedures.

BUILDING USERS

At CPFC we recognise that this legislation is applicable to all our users whether they are players, match-day fans, staff, board members, participants in foundation programmes and other people engaged with the club's activities.

REPRESENTATION & CONSULTATION

The Crystal Palace Football Disabled Supporters Association (CPFC DSA) works with the Club management to address issues and concerns raised by members. The association is open to disabled supporters, their family, friends and personal assistants.

We have a dedicated Disabled Liaison Officer, Pam Groves, who assists with information relating to travel, entry and exiting the stadium and on match days she is supported by safeguarding stewards. For more information on disabled access or questions concerning ticketing please contact Pam on 020 8768 6080 or email pam.groves@cpfc.co.uk.

Consultation will form an important part of the information gathering process at all stages of the development of the strategy and future improvement works. An experienced and qualified Access Consultancy, Architectural Practice and Building Control Consultancy has been appointed to consider the access issues.

CPFC is committed to a policy of obtaining information and first hand experiences from users and potential users, and organisations representing them. It is important that as wide a section of the local population and visitors as possible can utilise the facilities; consultation with potential users is essential.

Users should always be involved in determining access, as individual requirements are paramount. Guidelines are useful in determining average and minimum requirements but as we are all unique an attempt to gauge actual local and anticipated usage is preferred.

Access groups are particularly important in the consultation process as the experts in listening to user needs. There are a number of local organisations who will be consulted as part of this strategy, examples include:

- Croydon Mencap
- Croydon Voluntary Action
- Royal Society for Blind Children
- Special Olympics Great Britain
- Mind in Croydon
- Disability Supporters Association (DSA)

- CPFC Supporters Trust
- Rego (Assisted Housing)
- CPFCCSC
- CPFC Power Chair Football Team
- RNIB
- Priory School
- Disability Croydon
- Embrace the Positive
- Red Gates School
- Freddie Framer Foundation
- Independence Homes
- The Garwood Foundation
- Leonard Cheshire – Bromley
- Lewisham disability Coalition
- Kids
- St Giles School
- National Autistic Society

Regular feedback will be encouraged from all visitors and building users. CPFC will continue to monitor, complaints and compliments and encourage membership of the DSA.

REFERENCE DOCUMENTS

A great deal of literature is available on the subject of inclusion, with guidance changing frequently to reflect rapidly changing demographics and case law. Some publications which have influenced this living statement are detailed in Appendix 1. It should be noted that these documents are cyclic and continue to be updated or amended. For any documents noted, the latest version will be applicable.

These documents should be referenced for all buildings and projects which the Stadium undertakes and any works on premise under their control. To ensure that the standards have the optimum effect they should be incorporated at the earliest stage possible to ensure the most cost effective solutions.

They should be used to;

- Audit existing premises
- Benchmark existing premises against operational policies
- Advise where works are required
- Advise briefing documents, designs and construction
- Advise refurbishment projects
- Assist in the monitoring of projects and completion inspections
- Review any premises prior to purchase or leasing

BUILDING HISTORY AND ACCESSIBILITY CHALLENGES.

The main stand was built in 1924 and the stadium has been the home of Crystal Palace Football Club since then, further development has been carried out in 1969, Whitehorse Lane and Arthur Wait, and the Holmesdale Rd in the early 1990's.

The main stand is currently the oldest in the Premier League, all of the stands are of different construction and each was built under various different regulations.

The Arthur Wait was built for standing and later adapted, this creates a unique problem with a shallow rake and challenging site lines. The stadium is constructed on a steeply sloping site with a 13m drop from the north east (Park Road/Holmesdale Road) side to the South West (Whitehorse Lane/Main Stand)

The stadium is hemmed in by roads on three sides and a supermarket and carpark on the fourth, the club does not own the carpark and has an arrangement with the supermarket. The stadium is also located in a residential area with residents on 4 sides, this ensures a considered planning approach.

The pitch itself is only accessed from one small entrance between the stands, which is the shared fire/ambulance and facilities access point, the edge of the pitch is extremely tight with a limited space between the touch line and stands.

Design Standards

There are a number of key areas that CPFC understand are important to equality in use and ensuring that all can use easily, safely, and with dignity, regardless of age, disability or gender. Appendix 2 outlines the standards to be achieved, any deviations from these will need to be agreed with CPFC.

SUMMARY

CPFC aims to provide a stadium to suit the needs of its diverse visitors, fans and staff. As the improvement project progresses this access strategy will be reviewed, monitored and evaluated, becoming more detailed as the design and management evolves.

The strategy will be reviewed by CPFC annually, or more frequently if; changes in legislation, case law, the building or users take place.

Signed

Position at CPFC

Date

Date of review

Prepared in association with:

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