

ACCESS AUDITS FOR PLACES OF WORSHIP DETAILED GUIDANCE

Under the EH/HLF scheme for *Repair Grants for Places of Worship in England 2002-2005*, first stage project development grants are going to be made for the preparation of access audits. We are likely to be asked: why do places of worship need an access audit, indeed what is an access audit, who should carry it out, and how much will it cost?

The concurrent note on Access Audits for Places of Worship has been prepared in a form that can be released to grant applicants and their professional advisers.

This note explains in more detail some of the issues, and is intended primarily for use in the regional teams.

Why do places of worship need an access audit?

English Heritage advises that the access audit/access plan methodology will help places of worship with their duty to comply with the *Disability Discrimination Act, 1995 (DDA)*. This advice is contained in our free leaflet *Easy Access to Historic Properties, 1995* (currently being revised for re-issue early in 2003). It is also confirmed in the Disability Rights Commission *Code of Practice, 2002*. Further references are given in the concurrent note, and in the sections below.

The cost of preparing an access audit will be an eligible cost for first stage project development grants. It is not optional. Only places of worship that already have a current access audit will not be expected to prepare one as part of the project development stage.

The cost of turning an access audit into an access plan is not eligible under the *Repair Grants for Places of Worship* scheme, nor is the cost of making any of the alterations that the audit/plan identifies and prioritises.

What is an access audit?

In the concurrent note we refer to the Council for the Care of Churches booklet: *Widening the eye of the needle: Access to church buildings for people with disabilities*, which gives advice specific to places of worship and which includes photocopyable accessibility audit checklists. This is not the only model for an access audit, but it is one that is readily available.

Widening the eye of the needle

Widening the eye of the needle: Access to church buildings for people with disabilities, is written by John Penton, an architect who is also a member of the National Register of Access Consultants, and is published by the Council for the Care of Churches, 2nd Edition 2001 (Price £10.95, copies available

from Church House Bookshop – phone number 020 7898 1306. There is also a website <http://www.chpublishing.co.uk>).

He refers extensively to the free EH leaflet *Easy Access to Historic Properties, 1995*, although he uses slightly different terminology; e.g. ‘Accessibility Plan’ rather than ‘Access Plan’. *Widening the eye* has the specific advantage of its later publication date in that it can and does make reference to relevant legislative developments since 1995

It should be noted that the DRC *Code of Practice 2002* has not adopted Penton’s terminology, but this can be easily understood, and does not limit the current relevance of *Widening the eye*.

The methodology of an access audit followed by access plan is more clearly set out in *Widening the eye* than in the current *Easy Access*. The texts are complementary rather than contradictory, though neither is particularly explicit on how to move from an access audit to an access plan. Nor is either particularly explicit as to the final form that an access audit might take, although *Widening the eye* has the considerable benefit of a series of accessibility access checklists to help in the production.

There are no other readily accessible sources of guidance that deal more explicitly with access audits for places of worship than *Widening the eye*, and, although *Widening the eye* is published by the publishing arm of the Church of England, its contents are more relevant to all places of worship than any other publication.

If the 2002/2003 round of *Repair Grants for Places of Worship in England* refers to *Widening the eye*, there is no reason why subsequent years cannot expand or alter this reference if one becomes available. The revised *Easy Access* is still going to deal with the wider historic environment rather than solely with places of worship.

Can we recommend access auditors?

It is probably not for us to say who should be carrying out the grant-aided access audits, just as we do not say who should carry out grant-aided conservation plans. It is the process that is important not just the author; it should draw in and include the clients so that, when complete, there is real ownership of the final document.

The *Disability Discrimination Act (DDA)* applies to all service providers. The supporting *Code of Practice, 2002*, now issued by the Disability Rights Commission, endorses the approach of access audits followed by access plans. It does not say who should carry these out.

John Penton, author of *Widening the eye*, is a member of the National Register of Access Consultants (NRAC) and he refers to this in his book.

The NRAC was set up in 1999 by the Centre for Accessible Environments, with initial funding by DETR and DfEE, with the worthy idea of ensuring quality and consistency. On its management committee are representatives of RADAR, RICS, and the RIBA; and there is a web site

www.nrac.org.uk

which is capable of interrogation but which will not give a complete list of consultants.

For whatever reason, prominent consultants known to us to be particularly associated with the historic environment, such as Lisa Foster, John Adams, David Bonnett and Andrew Walker do not appear on the Register. In these circumstances, we do not think we can direct applicants to the NRAC. And, as far as we are aware, there is no other easily accessible list of consultants.

How much should an access audit cost?

Preparing an access audit should not be a difficult or a prolonged process. Using the *Widening the eye* checklists, it should be possible for most places of worship to be visited one day and written up on another, including an overview of priorities and recommendations as seen by the auditor: say two person days, say £700. It will be appropriate for our HB architects and surveyors to test this against the applicants' own proposals when they make their site visit prior to preparing the English Heritage report.

Further notes on terminology

The Guidance Notes for Applicants for *Repair Grants for Places of Worship in England 2002-2005* refers to 'access audits' and the concurrent note refers to 'access audits' and 'access plans'. These are now standard English Heritage terms, but they have not been universally adopted. The following paragraphs explain the different references, and why we think that our terms are compatible with other terms now in circulation.

Planning Policy Guidance 15: Planning and the Historic Environment, 1994 (PPG 15) (Currently being revised)

The most relevant paragraph of the current guidance reads, in full:

“3.28 It is important in principle that disabled people should have dignified easy access to and within historic buildings. If it is treated as part of an integrated review of access requirements for all visitors and users, and a flexible and pragmatic approach is taken, it should normally be possible to plan suitable access for disabled people without compromising a building's special interest. Alternative routes or re-organizing the use of spaces may achieve the desired result without the need for damaging alterations.”

It does not specifically refer to 'access audits' or 'access plans', probably because these terms were not then in general circulation.

But whilst there is no further advice on either “an integrated review of access requirements” or what constitutes a “plan (for) suitable access”, it does seem that a two-part approach is envisaged, which is taken up in the documents that follow.

Disability Discrimination Act, 1995 (DDA)

The Act makes it unlawful for service providers to discriminate against disabled people in connection with the provisions of goods, facilities and services. It does not specifically refer to ‘access audits’ or ‘access plans’.

Easy Access to Historic Properties, 1995 (Easy Access)

The initial publication of the free EH leaflet followed the publication of the *DDA* and of *PPG 15*, and it quotes in full paragraph 3.28 (as set out above). It also promotes “the access aim...to promote simple uncomplicated movement up to, into, and around historic properties”. (*Easy Access p2*) And it states, “the first step towards satisfying [this aim] is a comprehensive assessment of an historic property’s access requirements resulting in an ‘Access Plan’ ”. (*Easy Access p5*)

This ‘comprehensive assessment’ is, effectively, an access audit (and will be described as such in the revised leaflet when it is published early next year).

Code of Practice, 2002 (CoP)

This Code, issued by the Disability Rights Commission (copies available from The Stationery Office – phone number 0870 600 5522) and also downloadable from their website (<http://www.drc-gb.org/drc/InformationAndLegislation/Page331a.asp>), gives practical guidance about how to respond to the DDA duties.

The Code does not impose legal obligations, but “if service providers... follow the guidance in the Code, it may help to avoid an adverse judgment by a court in any proceedings”. (*CoP, p2*)

“Service providers are more likely to be able to comply with their duty to make adjustments in relation to physical features if they arrange for an access audit of their premises to be conducted and draw up an access plan or strategy. Acting on the results of such an evaluation may reduce the likelihood of legal claims against the service provider.” (*5.42 of CoP*)

No definitions are given for ‘access audit’, or ‘access plan or strategy’, but it seems likely that the recommended process of an access audit followed by access plan or strategy, is the same as that identified in *Easy Access to Historic Properties*.

Revised Part M of the Building Regulations

The ODPM consultation document, on which comments are to be returned by 30 November 2002, introduces the new concept of an 'Access Statement' to be submitted at the same time as an application for Building Regulations approval. During pre-public consultation discussions with DTLR, we have asked whether this is the same as either an Access Plan or an Access Audit, and we have been told it is something different. Our consultation response is likely to include the comment that a proliferation of terms and concepts is unhelpful.

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