



## **ACCESSIBILITY MAPPING RESEARCH FOR PUBLIC CULTURAL ORGANISATIONS**

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### **SUMMARISED FINAL REPORT**



**Version 1: October 2025**



**Report Reference:**

**Adi Associates Environmental Consultants Ltd, 2025. Accessibility Mapping Research for Public Cultural Organisations. Final Report. San Gwann, October 2025.**

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### Accessibility Mapping Research for Public Cultural Organisations Final Report October 2025

Report for: **Arts Council Malta**

#### Revision Schedule

| Rev | Date   | Details     | Written by:  | Checked by:   | Approved by:  |
|-----|--------|-------------|--------------|---------------|---------------|
| 0.0 | Oct 25 | First Draft | Zofia Frycze | Rachel Xuereb | Adrian Mallia |

File ref: G:\\_Active Projects\Planning Services\Public Sector Planning Support\ACM001 - Arts Council Accessibility Mapping\Final Report to Client.docx



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## 1. INTRODUCTION

- 1.1. In April 2025, Adi Associates Environmental Consultants Ltd (Adi Associates) was awarded a tender by the Arts Council Malta (ACM) for the formulation of a Study entitled 'Accessibility Mapping for Public Cultural Organisations' (Contract Reference: ACM/1/2024).
- 1.2. The objective of the Contract *is to provide Arts Council Malta (ACM) with a mapping research process aimed at providing deliverables that will addresses the opportunities and challenges relating to accessibility to cultural venues, sites and programmes produced and managed by Public Cultural Organisations. The mapping process will identify how Public Cultural Organisations can support and facilitate accessibility of their cultural offer within the existing economic, legal and social contexts.*
- 1.3. The specific objectives in the delivery of the Study are:
  - *Mapping accessibility to cultural venues administered and managed by Public Cultural Organisations*
  - *Mapping accessibility to cultural programmes produced and managed by Public Cultural Organisations*
  - *Mapping the extent to which organisational structures and resources facilitate or hinder access to cultural expression and participation for cultural activities, projects and events.*
- 1.4. The following paragraphs describe the activities that took place under the Contract to achieve its objectives.
- 1.5. **Activity 1** involved the mobilisation for the Study and formulation of the Inception Report.
- 1.6. **Activity 2** was Stakeholder Engagement with a number of key stakeholders as listed in **Table 1.1** below. All meetings were minuted and the respective minutes circulated as described in Section 2 of this report.

**Table 1.1: Key Stakeholders**

|                                                              |                                                    |
|--------------------------------------------------------------|----------------------------------------------------|
| Arts Council Malta (ACM)                                     | Festivals Malta                                    |
| Commission for the Rights of People with Disabilities (CRPD) | Malta International Contemporary Art Space (MICAS) |
| NAPA                                                         | Mediterranean Conference Centre (MCC)              |
| Spazju Kreattiv                                              | Pjazza Teatru Rjal                                 |
| Teatru Manoel                                                | Teatru Malta                                       |
| Valletta Cultural Agency (VCA)                               | Opening Doors                                      |
| Malta Philharmonic Orchestra                                 |                                                    |

- 1.7. **Activity 3** involved desk research and includes an analysis of relevant policies, strategies, cultural programmes, site plans, national initiatives, reports, statistics, and publications. The documentation review also involved an evaluation of the outcomes of previous and current initiatives and documentation, to determine the success or otherwise of the outcomes. This research is described in **Section 3** of the Report.
- 1.8. **Activity 4** involved the on-site surveying of the cultural venues and sites managed by the Public Cultural Organisations (PCOs), to assess the physical accessibility infrastructure in place. A checklist of items to be assessed was prepared and agreed with ACM and CRPD and is found in **Appendix 1** of this Report. The checklist for the physical accessibility infrastructure was used to audit the MCC, MICAS, Pjazza Teatru Rjal, Spazju Kreattiv, and Teatru Manoel.
- 1.9. Accessibility in respect of other aspects (such as programmes and events, outreach, websites and social media, etc.) was more desk-based.
- 1.10. **Activity 5** brought together the research and assessments conducted through Activities 1 to 4, in the drafting and delivery of this final research report.

## 2. STAKEHOLDER ENGAGEMENT

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2.1. As described above a number of meetings were held with PCOs and other stakeholders. The following are the main points emerging from this stakeholder engagement:

- Physical Accessibility:
  - Many venues are in historic buildings, posing structural and heritage constraints (e.g., MCC, MICAS, Spazju Kreattiv, Teatru Manoel).
  - Lifts, ramps, and accessible toilets have been installed or upgraded in several venues, although access to some tiers, studios, or backstage areas remains limited.
  - Some outdoor venues and festival sites are inaccessible by design (e.g., underground stages or stairs-only locations).
  - Accessibility improvements are often project-based or incremental, not always integrated from the outset.
- Seating and Venue Layout:
  - Most venues provide designated wheelchair seating, though capacity is somewhat limited.
  - Flexible seating arrangements exist in some venues to accommodate diverse needs.
  - Newer venues or renovations (e.g., MICAS, Teatru Manoel) aim to integrate accessibility into stage access and performance areas.
- Communication & Sensory Accessibility:
  - Use of hearing loops is present but underpromoted or not uniformly functional.
  - Limited or inconsistent use of sign language interpretation and subtitles/captions.
  - Braille and easy-read materials used occasionally, often depending on artist consent or availability.
  - Efforts to include calming rooms or sensory-sensitive environments are emerging (e.g., mobile quiet rooms from CRPD; MICAS sensory garden).
- Ticketing and Pricing:
  - Concessionary pricing for students, elderly, and sometimes persons with disabilities is common.

- Companion ticket policies vary but often allow free entry for accompanying persons.
- Ticketing engines exist but web accessibility is a work in progress (e.g., websites under redesign or using plug-ins like Userway).
- Organisational Awareness & Staff:
  - Accessibility is generally treated as important but unevenly embedded in planning and policy.
  - Several organisations rely on venue-by-venue arrangements, lacking a centralised accessibility strategy.
  - Staff training in accessibility is limited or informal; CRPD “easy language” training is mentioned as a future support.
  - Few organisations have staff members with disabilities, though some have had in the past.
- Programming and Audience Inclusion:
  - Some events/programmes include artists with disabilities or cater to disabled audiences (e.g. Dance Festival Malta, Žigužajg, Opening Doors collaborations).
  - Participation of disabled groups has declined in some areas (e.g. Carnival performances).
  - Not all programmes actively consider accessibility from the beginning—it’s often case-by-case (e.g. NAPA).
- Digital & Media Accessibility:
  - Promotion mainly via social media and websites; accessibility levels vary.
  - Some venues are moving toward inclusive digital design (e.g. MPO risk assessments, TM website updates, VCA’s FITA-certified site).
  - Virtual exhibitions and audio descriptions are used when possible but are constrained by artist permissions and copyright.

### 3. DESK RESEARCH

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- 3.1. As agreed in the kick off meeting, the ACM has provided available research documentation that is described further in this section.

#### **NATIONAL LEGISLATION, POLICIES & GUIDELINES**

- 3.2. The relevant local legislation, policies, and guidelines relating to accessibility include:
- Equal Opportunities (Persons with Disability) Act, Cap. 413 of the Laws of Malta;
  - Access to Goods and Services and their Supply (Equal Treatment) Regulations, 2008.
  - Accessibility Standards for all in a Built Environment Regulations, 2019;
  - Development Control Design Policy, Guidance and Standards, 2015;
  - MEPA Circular 2/14 - Protocol to Regulate Development Planning Applications in Terms Of “Access for All” Requirements;
  - KNPD Access for All Design Guidelines, 2011; and
  - CRPD Vetting checklist.
- 3.3. These are described in the following sections.

#### **The Equal Opportunities (Persons with Disability) Act**

- 3.4. The Equal Opportunities (Persons with Disability) Act, Chapter 413 of the Laws of Malta, enacted in 2000, is a comprehensive anti-discrimination law that protects the rights of persons with disabilities across various sectors, including employment, education, access to goods and services, accommodation, and more. While the Act does not explicitly mention cultural activities, its provisions are broad and encompass areas that indirectly relate to cultural participation.
- 3.5. Under Part III, Title 4 of the Act, it is stated that “no qualified person with a disability shall, on the grounds of disability, be excluded from participation in or be denied the benefits of the programmes or activities of any person or body in relation to the goods, facilities or services to which this article applies”. This provision ensures that persons with disabilities have equal access to services, which can include cultural venues and events.
- 3.6. Additionally, the Act mandates the provision of “reasonable accommodation,” defined as “alterations not imposing a disproportionate or unjustifiable burden, where needed in a particular case, to ensure to persons with disability the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms”. This requirement supports the adaptation of cultural spaces and activities to be accessible to all.

- 3.7. In summary, while the Act does not specifically address culture or cultural activities, its broad anti-discrimination provisions and emphasis on equal access and reasonable accommodation lay the groundwork for inclusive cultural participation for persons with disabilities in Malta.

### **Access to Goods and Services and their Supply (Equal Treatment) Regulations, 2008**

- 3.8. The Legal Notice entitled “*Access to Goods and Services and their Supply (Equal Treatment) Regulations, 2008*” focuses on gender equality in accessing goods and services, including cultural events, though not explicitly naming cultural events. Based on its broad application to all public and private services, it is relevant to accessibility for cultural activities.
- 3.9. The regulations apply to “all persons who provide goods and services made available to the public... including public bodies” and thus cover access to cultural venues and events if offered to the public. They prohibit discrimination on the basis of sex, including both direct and indirect discrimination, and extend protections to pregnancy and maternity. Organisations are responsible for preventing harassment and for ensuring that their rules and practices uphold the principle of equal treatment. The regulations require the abolition or amendment of any administrative or internal rules that contradict the principle of equal treatment.

### **Accessibility Standards for All in a Built Environment Regulations, 2019**

- 3.10. The *Accessibility Standards for All in a Built Environment Regulations, 2019* (Legal Notice 198 of 2019) establish mandatory accessibility requirements for Malta's built environment, aiming to eliminate physical barriers that hinder individuals, particularly persons with disabilities, from fully participating in society. While the regulations do not explicitly reference cultural activities, their comprehensive scope encompasses all public spaces, including those used for cultural purposes.
- 3.11. These regulations mandate that all new constructions and significant renovations of public buildings adhere to accessibility standards. This includes ensuring accessible entrances, circulation spaces, sanitary facilities, and signage, thereby facilitating equal access to venues such as theatres, museums, and community centres. By doing so, the regulations support the inclusion of persons with disabilities in cultural life, aligning with the principles of universal design.
- 3.12. Enforcement of these standards is overseen by the Commission for the Rights of Persons with Disability (CRPD), which has been granted enhanced powers to ensure compliance. This includes the authority to contest non-compliance and to promote the implementation of accessibility measures across various sectors.
- 3.13. In summary, the 2019 regulations represent a significant step towards creating an inclusive built environment in Malta. By mandating accessibility in public buildings, they lay the groundwork for the full participation of persons with disabilities in all aspects of public life, including cultural activities.

## **Development Control Design Policy, Guidance and Standards 2015**

- 3.14. The *Development Control Design Policy, Guidance and Standards 2015* (DC15), issued by the Malta Environment and Planning Authority (MEPA), outline comprehensive accessibility requirements to ensure inclusive design in the built environment. These standards aim to facilitate equal access for all individuals, including persons with disabilities.
- 3.15. Key accessibility requirements in DC15 include:
- Entrances and Circulation: Buildings must provide accessible entrances and internal circulation routes. This includes the provision of ramps, lifts, and corridors that accommodate wheelchair users.
  - Sanitary Facilities: Accessible sanitary facilities are mandated, ensuring that restrooms are usable by individuals with varying mobility needs.
  - Parking: Designated accessible parking spaces should be provided, located close to building entrances and designed to accommodate vehicles used by persons with disabilities.
  - Signage and Wayfinding: Clear and legible signage is required to assist all users in navigating buildings and public spaces effectively.
  - Public Open Spaces: The design of public open spaces must consider accessibility, ensuring that parks, squares, and other communal areas are usable by everyone.
- 3.16. While DC15 does not explicitly reference cultural activities, its broad applicability to public buildings and spaces inherently includes cultural venues such as theatres, museums, and community centres. By enforcing these accessibility standards, DC15 promotes inclusive participation in cultural life, aligning with the principles of universal design and equal opportunity.

## **MEPA Circular 2/14 - Protocol to Regulate Development Planning Applications in Terms Of “Access for All” Requirements**

- 3.17. MEPA Circular 2/14, titled *Protocol to Regulate Development Planning Applications in Terms of “Access for All” Requirements*, establishes a framework to integrate accessibility considerations into Malta's development planning process, particularly addressing ambiguities encountered during development control.
- 3.18. Its key provisions are:
- Exemptions for Small Spaces: Spaces mandated to comply with “access for all” regulations but having a floor area less than 75 square metres are exempted. Notably, “stores and kitchens are specifically excluded for the purpose of area computation.”
  - Risk-Prone Areas: Areas posing potential risks to persons with disabilities due to the nature of activities conducted are excluded from accessibility assessments.

- **Independent Monitoring for Major Projects:** For significant developments, applicants may appoint an independent accredited monitor to oversee works. This monitor can endorse plan changes without halting construction for KNPD approval and is responsible for issuing clearances required for the final compliance certificate.
  - **Topographical Exemptions:** Applicants are exempted from “access for all” requirements when:
    - The immediate existing/schemed street gradient exceeds a slope of 1:8.
    - The immediate existing/schemed public access consists of a flight of steps.
    - The vertical distance between the street/pavement and the existing elevated ground floor exceeds 1.5 meters.
  - **Mechanical Stair Climbers:** As a remedial solution, "mechanical stair climbers" may be considered when the vertical distance between street level and the elevated ground floor does not exceed 1.5 meters.
  - **Existing Developments Post-2000:** No additional accessibility requirements are imposed on existing structures approved after 2000 if:
    - The proposed use is similar or complementary to the approved use.
    - Interventions are within the same built footprint.
  - **Inclusions Fund Contribution:** New developments or extensions over 75 m<sup>2</sup> that cannot comply due to topographical constraints must contribute to an “Inclusions fund” administered by the KNPD. Rates are:
    - €20 per m<sup>2</sup> of non-accessible area, capped at €5,000.
    - In Urban Conservation Areas (UCAs), the rate is halved, still capped at €5,000.
- 3.19. Applicants seeking exemptions must submit a detailed report justifying the request, including photos, drawings, and measurements, clearly indicating the areas and their sizes.

### **Access for All Design Guidelines (2011)**

- 3.20. The *Access for All Design Guidelines* (2011), published by Malta’s National Commission Persons with Disability (KNPD), provide comprehensive standards to ensure the built environment is inclusive and accessible to all, particularly persons with disabilities. Grounded in the principles of universal design, these guidelines aim to eliminate physical barriers and promote equal participation in society.
- 3.21. The key provisions of the guidelines are:
- **Accessible Routes and Surfaces:** All routes must have firm, slip-resistant, and

smooth surfaces. A minimum width of 1.2 metres is required, with turning spaces of 1.5 metres by 1.5 metres at changes in direction. Cross slopes should not exceed 1:50. Tactile paving is recommended to aid visually impaired individuals.

- **Parking and Drop-Off Points:** Designated accessible parking spaces should include an adjacent aisle of at least 1.5 metres for manoeuvrability. Drop-off areas should be located close to accessible entrances.
- **Entrances and Doors:** Main entrances must be accessible, with level access or ramps conforming to specified gradients. Doors should have a minimum clear opening width of 900 mm and be equipped with accessible hardware.
- **Internal Circulation:** Corridors should be at least 1.2 metres wide. Ramps and stairs must adhere to specified dimensions and include handrails. Lifts should accommodate wheelchairs and have accessible controls.
- **Sanitary Facilities:** Accessible toilets must have minimum internal dimensions of 2,200 mm by 1,500 mm, allowing a 1,500 mm turning circle. Fixtures should be positioned for ease of use and grab rails must be installed as specified.
- **Fire Safety:** Emergency exits must be accessible. Areas of refuge should be provided on each floor, equipped with communication systems and identified by signage.
- **Signage and Lighting:** Signage should be clear, well-lit, and use both symbols and text. Lighting levels must be adequate to ensure safety and aid those with visual impairments.

3.22. These guidelines serve as a framework for architects, planners, and developers to create environments that are accessible and welcoming to all individuals, regardless of ability.

3.23. Other Maltese legislation related to blue badge and reserved parking laws of Malta include:

- S.L. 65.05 - Traffic Signs and Carriageway Markings Regulations;
- S.L. 65.11 - Motor Vehicles Regulations;
- S.L. 65.27 - Mdina (Restriction of Access and Transit of Vehicles) Regulations;
- S.L. 65.31 - Vehicle Access Zones (Control) Regulations;
- S.L. 363.80 - Controlled Parking Schemes (Residents and Commercial) Regulations;
- S.L. 627.03 - User Guidelines on the Accessibility Requirements for Products and Services; and
- Parking Concessions for Persons with Disability Act, Cap. 560 of the Laws of Malta.

## **INTERNATIONAL LEGISLATION, POLICIES & GUIDELINES**

3.24. International legislation includes:

- United Nations Convention on the Rights of Persons with Disabilities Act;
- Charter of Fundamental Rights of the European Union (2000/C 364/01);
- European Pillar of Social Rights;
- Council Directive 2000/78/EC 2000 establishing a general framework for equal treatment in employment and occupation;
- European Union Directive (EU) 2019/882 on the accessibility requirements for products and services; and
- Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030.

3.25. These are described in the following sections.

### **United Nations Convention on the Rights of Persons with Disabilities Act**

- 3.26. The United Nations Convention on the Rights of Persons with Disabilities (CRPD) affirms the right of persons with disabilities to fully participate in cultural life on an equal basis with others. Article 30 of the Convention is dedicated to this theme, stating that States Parties “recognize the right of persons with disabilities to take part on an equal basis with others in cultural life.” This includes access to “cultural materials in accessible formats,” such as books, films, and performances. The Convention also emphasizes the importance of accessibility in “television programmes, films, theatre and other cultural activities, in accessible formats.”
- 3.27. Moreover, Article 30 underscores the right to enjoy access to places of cultural significance: “to enjoy access to monuments and sites of national cultural importance.” It encourages States to support the “participation of persons with disabilities in mainstream sporting activities” and to promote their involvement in “recreational, leisure and sporting activities” adapted to their needs. Additionally, it calls for the recognition and support of the “specific cultural and linguistic identity of persons with disabilities,” including sign languages and deaf culture.
- 3.28. Overall, the CRPD promotes inclusive cultural participation and demands the removal of barriers that prevent persons with disabilities from accessing and contributing to cultural life.

### **Charter of Fundamental Rights of the European Union (2000/C 364/01)**

- 3.29. The Charter affirms the right to access cultural events through a combination of general principles and specific rights that protect inclusion, equality, and dignity.
- 3.30. Specifically, Article 22 states: “*The Union shall respect cultural, religious and linguistic diversity.*” This supports the protection and accessibility of diverse cultural

expressions and events for all individuals.

- 3.31. Article 21 prohibits discrimination on various grounds, including “disability”, “age”, and “sex.” This principle underpins equal access to cultural events by ensuring that no one is excluded based on personal characteristics.
- 3.32. Article 26 affirms that the Union “recognises and respects the right of persons with disabilities to benefit from measures designed to ensure their independence... and participation in the life of the community.” This includes cultural participation.
- 3.33. In essence, the Charter provides a clear legal foundation for ensuring that all individuals, particularly persons with disabilities and the elderly, have the right to access and engage in cultural events on an equal basis.

### **European Pillar of Social Rights**

- 3.34. The European Pillar of Social Rights is a guiding framework adopted by the EU to promote fair and well-functioning labour markets and welfare systems. It sets out 20 key principles, grouped into three categories: equal opportunities and access to the labour market; fair working conditions; and social protection and inclusion.
- 3.35. Principle 17 specifically addresses the rights of persons with disabilities:  
*“People with disabilities have the right to income support that ensures living in dignity, services that enable them to participate in the labour market and in society, and a work environment adapted to their needs.”*

### **European Accessibility Act**

- 3.36. European Union Directive (EU) 2019/882 on the accessibility requirements for products and services—commonly referred to as the European Accessibility Act—establishes common accessibility requirements for a wide range of products and services across EU member states, many of which relate directly or indirectly to access to cultural events. While the directive does not focus exclusively on cultural events, it imposes accessibility obligations on the digital and physical infrastructure through which cultural services are delivered. It ensures that persons with disabilities have equitable access to cultural content, information, and services by targeting key tools such as websites, audiovisual content, ticketing platforms, and self-service technology.
- 3.37. Accessibility requirements cover “electronic communications services including the related terminal equipment,” which includes digital ticketing systems and online platforms. This is critical for cultural events that rely on digital access points for attendance.
- 3.38. Cultural institutions offering services online (e.g., museums, theatres) must ensure “websites and mobile device-based services, including the related media players, are perceivable, operable, understandable and robust” (Annex I, Section I). This ensures access to cultural content and event information online.

- 3.39. Where self-service ticketing or information kiosks are used (e.g., at theatres or museums), the directive requires that these be accessible to persons with disabilities (Article 2(1)(g), Annex I, Section VI).

**Council Directive 2000/78/EC 2000 establishing a general framework for equal treatment in employment and occupation**

- 3.40. Council Directive 2000/78/EC establishes a framework for equal treatment in employment and occupation, with indirect implications for access to cultural events. Although the Directive does not explicitly mention cultural events, it contains several principles relevant to cultural participation through equal access in employment and public life.
- 3.41. The Directive highlights that employment and occupation are crucial to full participation in social and cultural life: *“Employment and occupation are key elements in guaranteeing equal opportunities for all and contribute strongly to the full participation of citizens in economic, cultural and social life...”*.
- 3.42. Discrimination based on *disability, age, religion or belief, or sexual orientation* is prohibited in employment contexts.
- 3.43. Article 5 requires that “reasonable accommodation shall be provided” for persons with disabilities to ensure equal access to employment. This supports the presence and inclusion of persons with disabilities in cultural professions and potentially in organizing or participating in cultural events.

**Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030**

- 3.44. The document titled *Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030* addresses access to cultural events as a key element of inclusion for persons with disabilities within the European Union.
- 3.45. Under Priority Area 5: Promoting Access to Culture, Sport, and Tourism, the Strategy states that *“persons with disabilities must be able to participate in cultural life, sport, and tourism on an equal basis with others.”* It emphasizes the need to eliminate barriers that restrict access to cultural venues, events, and content.
- 3.46. The Strategy highlights that the Commission will work to *“make cultural activities and venues, including those online, more accessible,”* aligning with obligations under the UN Convention on the Rights of Persons with Disabilities. The goal is to ensure *“that cultural content is accessible for persons with disabilities, including in digital formats.”*
- 3.47. It also mentions promoting *“inclusive and accessible EU cultural events and funding programmes,”* ensuring that EU-supported initiatives include accessibility as a core criterion.

## NATIONAL STUDIES & PROJECTS

### Community Inclusion and Accessibility in Valletta 2018

- 3.48. *Community Inclusion and Accessibility in Valletta 2018* addresses accessibility to cultural events within the context of the activities in connection with Valletta's European Capital of Culture designation (2018). It presents both achievements and shortcomings related to physical and informational access for persons with disabilities.
- 3.49. The report acknowledges that accessibility was inconsistently implemented, noting that while "*certain venues and events paid close attention to accessibility issues*," others fell short. It points out that "physical access, particularly in Valletta with its hilly topography and narrow streets, remains a major barrier," especially for those using mobility aids.
- 3.50. Crucially, the document criticizes the lack of accessibility considerations in some planning stages: "In many cases, the accessibility of cultural events and spaces was not considered from the start." Furthermore, it emphasizes the limited availability of alternative formats for information: "Programmes and promotional material were rarely available in alternative accessible formats such as Braille, large print or audio."
- 3.51. Although some improvements were made, including the use of accessible venues and efforts to involve persons with disabilities, the report underscores the need for more systemic and early-stage integration of accessibility principles.

### Spazji Teatrali: A Catalogue of Theatres in Malta and Gozo (2016)

- 3.52. The document *Spazji Teatrali: A Catalogue of Theatres in Malta and Gozo (2016)*, produced by the Valletta 2018 Foundation, presents a detailed survey of 78 theatre spaces across Malta and Gozo. Its primary focus was to map and assess the physical, technical, and cultural characteristics of these venues, with some attention to accessibility under the broader aim of "Access for All."
- 3.53. While the publication does not explicitly outline a policy framework or standards for accessibility, it does include data on key accessibility features for each venue. These include:
  - Wheelchair Access: Each theatre entry assesses whether wheelchair access is present, noting whether access is "existent" or "inexistent."
  - Pedestrian Access, Road Network & Parking Facilities: These are rated as "poor," "fair," "good," or "excellent," offering indirect insight into the ease of reaching the venue for all users.
  - Venue Maintenance & Comfort: State of repair, presence of air conditioning, and seating types (fixed/removable) are also reviewed, which impact inclusive usability.
- 3.54. The document acknowledges that many theatres lack full accessibility, stating that this is a preliminary visual survey not intended to verify compliance with legal standards.

It suggests the need for future detailed studies to include accessibility improvements and “refurbishment interventions” for underused spaces, thereby supporting broader cultural inclusion.

### **Easy, Accessible, Simple and Effective Project**

- 3.55. The E.A.S.E. project (Easy, Accessible, Simple and Effective) was launched in March 2024 under the Erasmus+ programme. In this project the CRPD partnered with Social Enterprise Puzzle (Greece), Boarve Konsult AB (Sweden), and Cyprus Certification Company to enhance accessibility in communication. Participants from entities like Agenzija Sapport, Jobsplus, and Lifelong Learning received training on creating Easy Read materials—simplifying language, content, and presentation to make information accessible.
- 3.56. Easy Read is important for persons with intellectual disabilities but also benefits the elderly, persons with dyslexia, and immigrants. It ensures access to important information on topics like finance, health, and education.

### **I-ACCÈSS project**

- 3.57. The ‘I-ACCÈSS’ project has the main goal of developing innovative solutions to improve the cultural and physical accessibility of cultural heritage in historic centres, considering cultural heritage as a driving force for the integration and development of the society. Through the exchange of cross-border expertise, new models and intervention methods will be developed to improve the accessibility and the enhancement of pedestrian areas in city centres.

## 4. SITE SURVEYS

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- 4.1. This section outlines methodology and findings of site surveys, both physical and digital.

### **METHODOLOGY - PHYSICAL ACCESSIBILITY**

#### **Objectives**

- 4.2. The objectives of the physical accessibility surveys were to:
- Assess the level of accessibility of public cultural venues.
  - Identify accessibility barriers affecting users with visual, auditory, cognitive, or motor disabilities.
  - Provide evidence-based insights to support recommendations for improvement.

#### **Methodology**

- 4.3. The methodology was developed in consultation with Arts Council Malta whereby a checklist was prepared and agreed and was used as the basis for carrying out the physical audits at the PCO venues. The Physical Accessibility Checklist is included in **Appendix 1**.
- 4.4. Following the development of the checklist, **on-site surveys** were conducted at selected cultural venues. Observations were recorded directly at each site, allowing for the identification of both compliance and areas requiring improvement. Photographic documentation and supplementary notes were included where necessary to support the assessments. For every site, a report was created including specific findings and recommendations.

#### **Limitations**

- 4.5. As required by the Contract, the assessment focused on a limited number of venues, which are those that are administered by the PCOs. However, it is important to acknowledge that the small number of venues included in the assessment does not provide a comprehensive picture of accessibility standards across the entire cultural sector in Malta.

#### **Timeline**

- 4.6. The accessibility audits were conducted over a three-month period, from July 2025 to September 2025. Each site visit was scheduled in coordination with venue management to ensure access to relevant areas and staff. In cases where construction or redevelopment activities were ongoing, assessments were limited to accessible and completed portions of the sites, with planned changes noted for future reference.

## METHODOLOGY - DIGITAL ACCESSIBILITY

### Objectives

- 4.7. The objectives of the digital accessibility surveys were to:
- Assess the level of compliance with WCAG 2.1 AA standards<sup>1</sup> and EN 301 549<sup>2</sup>.
  - Identify accessibility barriers affecting users with visual, auditory, cognitive, or motor disabilities.
  - Evaluate the presence and clarity of published Accessibility Statements, as required by Directive (EU) 2016/2102.
  - Provide evidence-based insights to support recommendations for improvement.

### Methodology

- 4.8. The methodological framework described below ensures a structured, replicable approach to assessing digital accessibility in line with EU and international standards, supporting inclusivity and equal access to cultural content online.
- 4.9. The methodology used was based on the review criteria listed in **Table 4.1** below.

**Table 4.1: Digital Accessibility Criteria**

| Accessibility Criterion        | Description                                                     |
|--------------------------------|-----------------------------------------------------------------|
| Accessibility Statement        | Presence of a published, updated Accessibility Statement.       |
| Compliance Reference           | Clear mention of WCAG 2.1 AA and/or EN 301 549 standards.       |
| Feedback Mechanism             | Presence of a method to report accessibility issues.            |
| Contrast & Text Resizing Tools | Built-in tools for adjusting contrast or font size.             |
| Keyboard Navigation            | Ability to navigate the site without using a mouse.             |
| Alternative Text               | Use of meaningful alt text on images and graphics.              |
| Screen Reader Compatibility    | Code structure supports assistive technologies.                 |
| Accessible Forms               | Forms are labelled and usable with screen readers.              |
| Mobile Responsiveness          | Site displays and functions well on mobile devices and tablets. |

- 4.10. A combination of manual review and automated tools were employed, including:
- WAVE Accessibility Tool
  - axe DevTools (Chrome Extension)
  - Lighthouse (Chrome Developer Tools)
  - Site-specific visual inspection

<sup>1</sup> Web Content Accessibility Guidelines (WCAG) 2.1. Accessibility Guidelines Working Group. 2025

<sup>2</sup> EN 301549:2021. Accessibility requirements for ICT products and services. CEN/CLC/ETSI JTB eAccessibility. 2021

- Review of source code (HTML/CSS structure) for ARIA labels, semantic tags, etc.
- 4.11. Each criterion was reviewed and assigned one of the following statuses:
- ☒ Present and functional
  - ☐ Present but limited/partially functional
  - ☒ Missing or not functional
- 4.12. The assessors included comments to provide qualitative notes on the usability and user experience implications.
- 4.13. For all sites visited, a table was compiled listing the accessibility features evaluated.

## **PHYSICAL ACCESSIBILITY - FINDINGS**

- 4.14. This section of the report describes the general findings from the accessibility audits conducted across the five PCO venues. It summarizes common strengths, recurring barriers, and key observations identified during the site visits, providing an overview of accessibility conditions at the time of assessment.
- 4.15. Both the meetings with PCOs as well as the site surveys showed that accessibility is actively considered by all PCOs. The PCOs also recognize that challenges remain and have pledged to continue improving accessibility in their venues. Main challenges relate to the historic context of the buildings as well as the cost of retrofitting to make spaces more accessible.
- 4.16. Most of the venues provide basic accessibility infrastructure such as ramps, wide corridors, accessible toilets, space in auditoriums for wheelchairs, and signage. However, challenges in most venues relate to accessible parking, and safe evacuation routes in the case of emergencies.
- 4.17. Requirements such as areas for service dogs, quiet rooms, and use of Braille remain a challenge for all of the venues.
- 4.18. Notable accessibility features include: the presence of evacuation chairs in the upper floors that can easily be used to go downstairs from the upper floors; audible signalling in lifts; use of hearing loops; use of platform lifts; and provision of a refuge area.
- 4.19. The following paragraphs describe in some more detail, the findings of the physical accessibility surveys.
- 4.20. Lack of accessible parking in most venues:
- Accessible parking is either lacking or located too far from the main entrance at several venues. This presents a significant barrier for visitors with limited mobility and does not align with best practices for inclusive access. Although the location of all the venues in Valletta presents a challenge in terms of parking, the auditors consider that there is opportunity for improvement to provide at least one parking space per venue.

- 4.21. Routes leading to entrances are not always fully accessible:
- Auditors observed that some routes leading to building entrances were steep, uneven, or had slippery surfaces. These conditions can pose serious accessibility and safety challenges, particularly for wheelchair users, individuals with mobility impairments, and those with visual disabilities.
- 4.22. Interior ramps and staircases lack handrails:
- Interior ramps and staircases in several venues lack appropriate handrails, which compromises safety and accessibility for individuals with mobility impairments or balance difficulties.
- 4.23. Dedicated spaces in the auditoriums for wheelchairs:
- Those venues that include auditoriums, provide visitors with designated spaces for wheelchair users and their companions in the audience area.
- 4.24. Accessible bathrooms:
- All the venues include accessible bathrooms on different floors, for both audience and staff. Although some issues did emerge from the survey, in most of the cases they are easily fixable.
- 4.25. Large lobbies and reception areas:
- All the venues are equipped with large lobbies and reception areas with adequate turning space for wheelchair users. However, in some venues the height of the reception desk was inadequate, rendering the reception inaccessible.
- 4.26. Unobstructed and wide corridors:
- In general, all the assessed venues have wide and unobstructed corridors providing visitors with comfortable access to spaces within the buildings. Where spaces weren't adequate, the auditors described these in the individual reports (see **Appendix 2**).
- 4.27. Signage is present, but does not fully comply with the requirements:
- There is lack of Braille language in all of the audited venues. Additionally, directional signage to e.g. restrooms or evacuation routes in most of the cases is not clear yet.
- 4.28. Lack of accessible emergency routes from upper or lower floors:
- In some venues the evacuation routes from lower or upper floors are not accessible. In all venues evacuation is only available via staircases as during a fire, for example, elevators cannot operate.
- 4.29. Emergency alarms:

- Most of the emergency alarm systems rely solely on audible signals, with no visual or tactile alerts available. This poses a serious safety risk for individuals who are deaf or hard of hearing and highlights the need for more inclusive emergency communication systems.

## **DIGITAL ACCESSIBILITY - FINDINGS**

- 4.30. This section outlines and summarises the main findings from the digital accessibility assessment of the PCO's websites.
- 4.31. Most of the websites were found to be generally functional or fully operational. However, several areas would benefit from minor adjustments or the addition of accessibility features to enhance usability for all users, particularly those with disabilities.
- 4.32. All of the websites are equipped with feedback mechanisms, allowing users to report issues, ask questions, or provide suggestions.
- 4.33. Contrast and text adjustment tools are available on most websites; however, they are often only partially functional.
- 4.34. Keyboard navigation is implemented across all websites; however, it is not fully functional on all of them.
- 4.35. Alternative text and screen reader compatibility were found to be only partially functional on five out of the ten assessed websites.
- 4.36. Most of the websites lack properly accessible forms, which poses significant challenges for users relying on screen readers.
- 4.37. One of the websites is missing an accessibility statement and WCAG / EN 301549 reference.
- 4.38. Only two out of all the assessed websites are not fully mobile friendly.

## 5. RECOMMENDATIONS

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- 5.1. This section outlines the general recommendations based on the findings from the accessibility assessments conducted across all venues. These recommendations aim to address recurring barriers and promote inclusive design solutions that benefit a wide range of users, including individuals with disabilities.
- 5.2. Creation of accessible emergency routes from upper and lower floors:
  - It is important to develop accessible emergency evacuation routes from both upper and lower floors to ensure safe exits for all users, including those with mobility impairments. Consideration should be given to purchasing evacuation chairs.
- 5.3. Signage improvement:
  - Improvement in signage is required throughout all the venues, including the addition of Braille, tactile maps, and clearer directional signs to aid navigation for visitors with visual disabilities.
- 5.4. Incorporation of assistive listening systems in the design of the venues:
  - Integrate assistive listening systems (e.g. induction loops or FM systems) into the design and infrastructure of venues to support visitors who are hard of hearing.
- 5.5. Emergency alarms should include both audible and visual signalling:
  - Ensure all emergency alarm systems include both audible and visual signals, such as flashing lights, to accommodate individuals who are deaf or hard of hearing.
- 5.6. Elevators should include both audible and visual signalling:
  - Equip elevators with both audible and visual indicators, including floor announcements and visual floor displays, to enhance accessibility for users with visual or hearing impairments.
- 5.7. Feasibility of having an area for service dogs:
  - Assess the feasibility of providing designated relief areas for service dogs, particularly in larger venues or those expecting high visitor traffic.
- 5.8. Regular restroom maintenance and specific adjustments:
  - Maintain restrooms regularly and implement targeted accessibility improvements, such as grab bars, lowered sinks, adequate turning space, and emergency call buttons.



## Appendix 1: Physical Accessibility Checklist

# PHYSICAL ACCESSIBILITY CHECKLIST

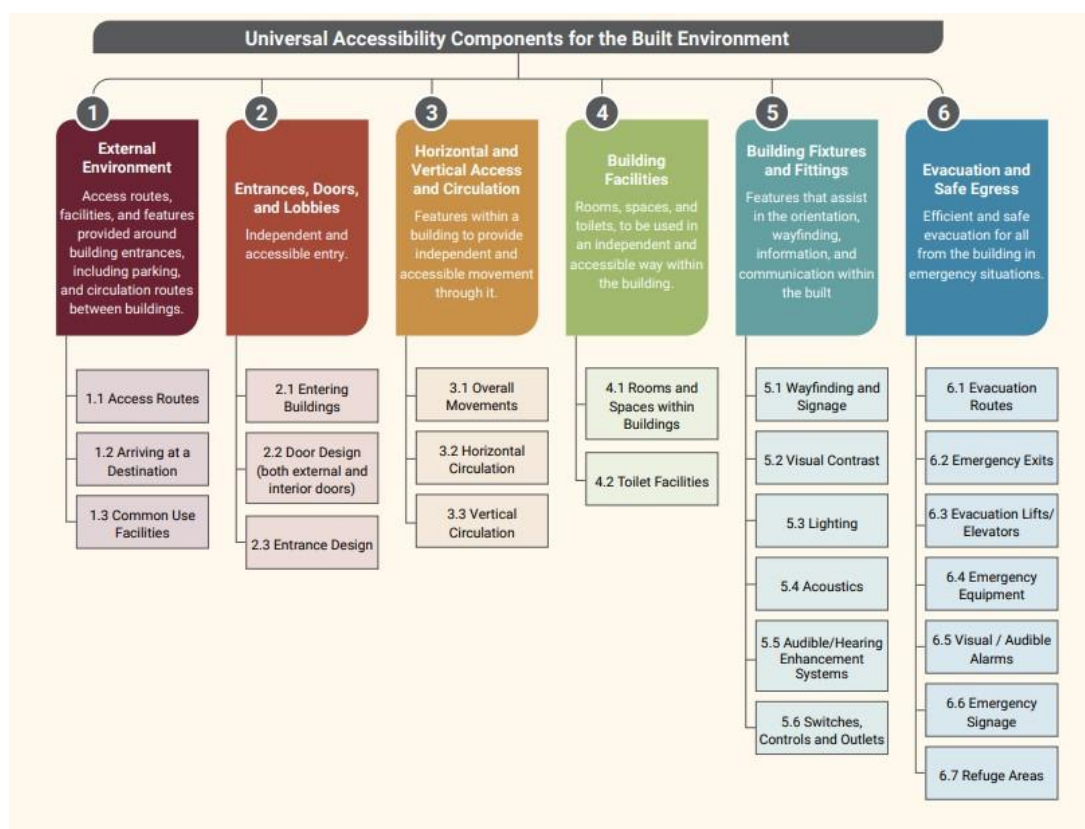
## INTRODUCTION

1. This Report covers part of Activity 4 of the Contract - Accessibility Mapping for Public Cultural Organisations. This activity envisages the on-site surveying of the cultural venues and sites managed by the PCOs, to assess the physical accessibility infrastructure in place. A checklist of items has been prepared for agreement with ACM and CRPD. The checklist for the physical accessibility infrastructure will be used to audit the MCC, MICAS, Pjazza Teatru Rjal, Spazju Kreattiv, and Teatru Manoel.
2. The following paragraphs outline the research documentation that informed the development of the checklist.

## THE CHECKLIST

3. A key component of the research was a table extracted from the report titled "Building Code Checklist for Universal Accessibility" (International Bank for Reconstruction and Development / The World Bank, 2025). This table served as the foundational framework and categorisation system for the on-site assessment criteria.

**Figure 1: Summary of components for physical accessibility survey**



4. The publication "Design for Accessibility a Cultural Administrator's Handbook" and

"Access for All Design Guidelines" were used for in depth analysis, in example for specific measurements and regulations.

5. Finally, all checklist items were cross-referenced to ensure compliance with the Maltese legislative framework and to confirm alignment with the CRPD Vetting Checklist requirements.
6. The table below will be used on site to assess the accessibility set up of the venues. The columns entitled Review and Evidence will be filled in by the auditors during the site visits.

**Table 1: Draft Physical Accessibility Checklist**

| Sections                | Accessibility Criterion    | Description                                                                                                                                                                                                                                                                                                                                                   | Review | Evidence (photographic) |
|-------------------------|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------|
| 1. External Environment | Exterior route             | Routes leading to the building must be stable, slip-resistant, and accessible for wheelchair users and must be at least 1.2m wide throughout.                                                                                                                                                                                                                 |        |                         |
|                         |                            | Where paving slabs and blocks are used, the joint between paving slabs /blocks should be flush and level. All joint/edges of the individual blocks should be flush and provide an even and smooth surface.                                                                                                                                                    |        |                         |
|                         |                            | Tactile paving should be used on accessible routes to provide warning and guidance to blind and partially sighted people. The message this surface indicates is (a) that there is a lack of a kerb height between the road and the footway and, (b) the location of the crossing point across a vehicle carriage way.                                         |        |                         |
|                         | Parking and Drop-off Areas | Accessible parking spaces with proper signage and accessible routes to entrances; drop-off zone/parking zone route to the venue needs to have proper signage.                                                                                                                                                                                                 |        |                         |
|                         | Parking: Accessible Spaces | When parking is available to the public or staff, a number of spaces should be designated for disabled motorists, whether they are visitors or permanent staff members. If parking includes 3 - 10 spaces at least one of them should be marked as accessible; 11 - 25: 2 spaces or 1 van accessible; 26 - 50: 2 spaces including 1 van accessible and so on. |        |                         |

|  |                             |                                                                                                                                                                                                                                                                                          |  |  |
|--|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | Parking: Surface            | Accessible parking spaces should be located on firm and level ground as close to the entrance as reasonable i.e. no more than 50m from the entrance.                                                                                                                                     |  |  |
|  | Parking: Measurements       | Accessible parking space should have a minimum width of 3.6 m and a minimum length of 4.8 m for perpendicular parking and a minimum length of 6.6 m for parallel parking. Parking spaces should have an access aisle at least 1500 mm wide along the entire length of the parking space. |  |  |
|  | Parking payment machines    | Pre-payment machines should be positioned as close as possible to the designated parking space/s.                                                                                                                                                                                        |  |  |
|  | Drop-off Area               | Where applicable, a drop off area should be provided and be visible from the main entrance.                                                                                                                                                                                              |  |  |
|  | Drop-off Area: Kerbs        | Kerbs should be provided at drop-off areas, where applicable.                                                                                                                                                                                                                            |  |  |
|  | Drop-off Area: Access       | An access aisle at least 150 cm wide and 600 cm long should be provided adjacent and parallel to the vehicle pull-up space.                                                                                                                                                              |  |  |
|  | Exterior Ramps              | Slopes of ramps should not be too steep and have a firm, non-slippery surface.                                                                                                                                                                                                           |  |  |
|  | Interior Circulation Routes | Corridors and pathways inside must be wide,                                                                                                                                                                                                                                              |  |  |

|  |                           |                                                                                                        |  |  |
|--|---------------------------|--------------------------------------------------------------------------------------------------------|--|--|
|  |                           | free of obstructions, and appropriate heights and visual/auditory indicators.                          |  |  |
|  | Surfaces                  | Surfaces inside should be made from firm, non-slippery materials.                                      |  |  |
|  | Service Dogs Relief Areas | The areas should be created, so the dogs can have a spot to relieve themselves and access clean water. |  |  |
|  | Obstacles                 | Any obstacles that might affect well-being of disabled people should be removed from the route.        |  |  |
|  | Interior Changes in Level | Interior changes in level should be addressed with wedges or small ramps.                              |  |  |

|                           |                       |                                                                                                                                                                                                                                                                   |  |  |
|---------------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 2. Entrance, Doors, Lobby | Entrance              | At least 50% of the pedestrian entrances (including the main entrance) should be served by an accessible route and have level access.                                                                                                                             |  |  |
|                           |                       | In existing buildings/facilities, in those cases where it may be reasonable to offer an alternative accessible entrance instead of an accessible main entrance, the alternative entrance should lead into the same reception area as that from the main entrance. |  |  |
|                           |                       | Where it may be reasonable to offer an alternative accessible entrance, signage giving directions from the main entrance to the alternative entrance should be posted prominently adjacent to the main entrance, and along the route between the two entrances.   |  |  |
|                           | Doors                 | Entrance should be approached by a flat, gradually sloping, smooth surface and should be clear from cars.                                                                                                                                                         |  |  |
|                           |                       | Doorbells, entry phones/identification systems should be sited for convenient use from a wheelchair. Phones and identification systems should contain a visual display to enable people with impaired hearing to use them.                                        |  |  |
|                           | Doors                 | Doors should have minimal opening force and preferably be automated or power assisted.                                                                                                                                                                            |  |  |
|                           | Doors: Internal Doors | Internal doors should include a glazed panel providing visibility between 900 mm and 1500 mm from the finished floor level where door operation poses a hazard, and if glass panels are used, the lowest edge must be no higher than 900 mm above the floor.      |  |  |

|  |                           |                                                                                                                                                                                                                                                                                                                                          |  |  |
|--|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | Doors: Signage            | Where applicable, doors should be clearly marked to indicate whether the door is to be pushed or pulled to open.                                                                                                                                                                                                                         |  |  |
|  | Doors: Hardware           | Door hardware should be located between 800 mm and 1200 mm above the floor                                                                                                                                                                                                                                                               |  |  |
|  | Door: Width               | The principal main accessible entrance door should have a minimum clear opening width of not less than 90 cm. Where double leaf doors are fitted, one leaf should be at least 90 cm wide.<br><br>Internal doors in existing buildings should have at least one leaf that provides a minimum clear opening width of not less than 800 mm. |  |  |
|  | Door: Swing door          | If there is a swing door, additional entrance should be provided and located nearby.                                                                                                                                                                                                                                                     |  |  |
|  | Glazing Design            | Glazing design for doors, windows and walls must include appropriate markings to reduce the risk of collisions.                                                                                                                                                                                                                          |  |  |
|  | Lobby design              | The lobby should have enough space, so a person in a wheelchair is able to move around.<br><br>The clear manoeuvring space in front of a counter or reception desk or similar fittings should accommodate a turning circle of 150 cm diameter                                                                                            |  |  |
|  | Counters / reception desk | Counters or reception desks should be located so they are easily identifiable from the main entrance.                                                                                                                                                                                                                                    |  |  |

|  |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |  |
|--|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |           | <p>Where waiting and queuing is the normal pattern of use, permanent or temporary control barriers should allow wheelchairs to turn towards the counter or desk.</p> <p>A reception desk or counter should have a working surface height at two heights: a) between 950 mm and 1100 mm to accommodate people who are standing; b) 760 mm to accommodate wheelchair users.</p>                                                                                       |  |  |
|  | Corridors | <p>Corridors and passageways should be easily navigable for persons with disabilities with minimum clear width of at least 1100 mm for corridors of length up to 15m and a minimum width of 1500 mm for lengths over 15 m.</p> <p>At corners, 1.5 m diameter should be provided for a turning space for wheelchairs.</p> <p>Any door that opens towards a frequently used corridor should be located in a recess at least as deep as the width of the door leaf</p> |  |  |

|                                                   |           |                                                                                                                                                                                                                                                                                                                                                                                                            |  |  |
|---------------------------------------------------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 3. Horizontal and Vertical Access and Circulation | Stairs    | <p>Stairs should be provided with handrails on both sides if they are less than 300 cm wide; if they are greater than 600 cm they should include handrails at intervals of 300 cm along the width of the flight.</p> <p>In any flights of stairs, steps should have the same rise height and the same going width throughout the entire flight.</p> <p>The rise of each step should not exceed 170 mm.</p> |  |  |
|                                                   | Handrails | <p>Handrails should have a round or oval profile with a minimum outside diameter of 3.5 cm and a maximum outside diameter of 5 cm.</p> <p>The surface should provide a good grip.</p> <p>Should be located at a height of 900 mm above the ground level of ramps and 1000 mm above landings.</p>                                                                                                           |  |  |
|                                                   | Carpets   | <p>Carpet must be securely attached with a firm backing and a pile no thicker than 1.27 cm to ensure safe, accessible use for mobility devices.</p>                                                                                                                                                                                                                                                        |  |  |
|                                                   | Elevators | <p>Elevators must be accessible with controls at appropriate heights and visual auditory indicators.</p> <p>The minimum internal dimensions of the cabin of the passenger elevator are as follows: 1100 mm wide and 1400 mm deep where the lift contains</p>                                                                                                                                               |  |  |

|  |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |  |
|--|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |                | <p>one door or has doors which are facing each other. 1400 mm wide and 1600 mm deep, where doors are located at 90 degrees relative to each other.</p> <p>An elevator door should be easily distinguishable from the adjoining wall by colour and luminance contrast</p> <p>Where an elevator has only one door, a mirror should be provided on the wall of the lift cabin opposite the lift door. The mirror should not extend below 900 mm from the lift floor.</p> <p>Auditory and visual signaling should be provided in every elevator, which serves more than two floors.</p> <p>Floors of elevators should include non-slippery surface.</p> |  |  |
|  | Platform Lifts | <p>Platform lifts should be installed (with landing area at least 1.5m x 1.5m) if there is no space for creating a ramp.</p> <p>Platform lifts without a lift enclosure are acceptable on distances not exceeding 2 m.</p> <p>The minimum clear dimensions of the platform of a platform lift should be: 1050 mm wide and 1250 mm deep, where the platform has one door or which are facing each other, 1100 mm wide and 1400 mm deep, where two doors are located at 90 degrees relative to each other.</p>                                                                                                                                        |  |  |

|  |                           |                                                                                                                                                                                                                                                                                                                                                             |  |  |
|--|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | Interior Ramps            | <p>Interior ramps should include handrails on both sides, resting points every 900 cm and should not be too steep.</p> <p>The maximum horizontal length of a ramp between level landings is 12 m.</p> <p>The ramp surface should be a contrasting colour to the landing to ensure it is easily distinguishable for individuals with visual impairments.</p> |  |  |
|  | Internal Security Control | <p>Internal security control systems are essential for ensuring safety, limiting access to specific areas to authorized user groups, and keeping records of individuals present on-site.</p>                                                                                                                                                                |  |  |

|                        |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |  |
|------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 4. Building facilities | Seating and Audience Areas   | Audience seating must include spaces for wheelchairs and companion seating with clear sightlines, with space for mobility aids nearby if users transfer to standard seats.                                                                                                                                                                                                                                                                                                                                                                |  |  |
|                        | Stages and Performance Areas | Stage and performance areas should be accessible via ramps or lifts where feasible.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |  |
|                        | Changing rooms               | <p>Dressing cubicles/changing rooms should have a minimum internal width of 2 m and internal length of 2.2 m.</p> <p>Horizontal grab rail 700 mm from the floor at the side of the seat.</p> <p>A mirror from 550 mm to 1450 mm above floor level.</p> <p>A zone for switches etc. at between 900 mm and 1200 mm above floor level.</p> <p>A minimum unobstructed internal height of 2.2 m.</p> <p>Floors with non-slippery surfaces.</p> <p>A clear internal height of at least 2.2 meters.</p> <p>They should include shower rooms.</p> |  |  |
|                        | Shower rooms                 | <p>Shower cubicles must be at least 2000 mm wide and 2200 mm long on the inside.</p> <p>Ideally, each cubicle should include both a shower and a toilet (WC).</p>                                                                                                                                                                                                                                                                                                                                                                         |  |  |

|  |                     |                                                                                                                                                                                                                                                                                                                                  |  |  |
|--|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |                     | <p>There needs to be space for turning with a 1500 mm diameter.</p> <p>Shower base should be levelled with the rest of the cubicle floor.</p> <p>Each shower cubicle must have a fold-down seat that does not automatically return to the upright position</p> <p>Floors should be non-slippery even when wet.</p>               |  |  |
|  | Sanitary facilities | All public buildings should have provision for accessible to all sanitary facilities.                                                                                                                                                                                                                                            |  |  |
|  | Restrooms           | Restrooms should include at least one accessible stall, grab bars, adequate turning space and a 900 mm wide door.                                                                                                                                                                                                                |  |  |
|  | Restrooms: Access   | Travel distances to accessible sanitary accommodation from any point in the building should be no greater than 40 m.                                                                                                                                                                                                             |  |  |
|  | Restrooms: Signage  | Restroom signage should include Braille, have raised characters, and include pictograms.                                                                                                                                                                                                                                         |  |  |
|  | Toilet cubicle      | <p>An accessible corner WC compartment should have minimum internal dimensions of 2150 mm long by 1650 mm wide.</p> <p>The toilet should feature a clear space for a wheel chair beside the toilet of at least 900 mm wide and at least 1500 mm deep (measured from the side wall/partition to the edge of the toilet seat).</p> |  |  |

|  |                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |  |
|--|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |                                        | <p>Locks on cubicle doors should be capable of being latched on the inside, using one hand and without tight grasping, pinching or twisting of the wrists, and released from the outside in case of emergency. Locking systems should be opened using lever handles</p> <p>Toilet cubicle doors should feature a D-type pull on the inside which is at least 140 mm long, located with its midpoint 200-300 mm from the hinged side of the door and at a height between 900-1000 mm from the floor.</p>                                                                                                                                                                                                           |  |  |
|  | Toilet cubicle: Toilet Paper Dispenser | A toilet paper dispenser should be located underneath the grab bars, so it is accessible from sitting position and mounted at a height between 600-700 mm from the floor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |  |
|  | Toilet cubicle: Grab rails             | <p>The toilet cubicle should feature a horizontal side grab rail at least 900 mm long, preferably extending at least 450 mm in each direction from the most forward point of the toilet bowl.</p> <p>The toilet cubicle should feature a vertical side grab rail at least 600 mm long, located no more than 250 mm in front of the toilet seat with its lower end 50-60 mm above the horizontal grab rail.</p> <p>The toilet cubicle should feature a fold -down grab rail on the wheelchair transfer side of the toilet bowl, at least 760 mm long, mounted on the rear wall. The centre line of the grab rail should be located 320-420 mm from the centre line of the toilet, and at a height between 680-</p> |  |  |

|  |                           |                                                                                                                                                                                                                                                                                 |  |  |
|--|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |                           | 840 mm from the floor.                                                                                                                                                                                                                                                          |  |  |
|  | Toilet cubicle: Toilet    | The WC compartment should have a WC installed as follows: the front to be 750 mm from the wall behind it, the top of the WC 400-460 mm (including the plastic moveable seating) from the finished floor, and the centre line to be no closer to the side wall than 460 mm.      |  |  |
|  | Toilet cubicle: Flush     | The flush control should be operable using one hand without tight grasping, pinching, or twisting of the wrist; should be mounted on the transfer side of the toilet, located at a height between 600-1100 mm above the floor; preferably electronic.                           |  |  |
|  | Toilet cubicle: Coat hook | The toilet cubicle should feature at least one coat hook located not more than 1200 mm high and projecting no more than 40 mm from the wall.                                                                                                                                    |  |  |
|  | Restrooms: Sinks          | The sink should be installed at a height that could be reached from sitting position; should be equipped with vertical grab rails at basin side wall with seat, mounted with its lower end 700-740 mm from the floor, 50-80 mm out from the outside edge of the wash hand basin |  |  |
|  | Restrooms: Taps           | Taps should be lever-operated; should not be less than 75mm long.<br><br>Tap water should not exceed 55 degrees Celsius.                                                                                                                                                        |  |  |
|  | Restrooms: Pipes          | Pipes should be lagged or boxed beneath basins.                                                                                                                                                                                                                                 |  |  |

|  |                            |                                                                                                                          |  |  |
|--|----------------------------|--------------------------------------------------------------------------------------------------------------------------|--|--|
|  |                            |                                                                                                                          |  |  |
|  | Restrooms: Mirrors         | Mirrors must have bottom-reflecting edges no more than 100 cm above the floor.                                           |  |  |
|  | Restrooms: Soap Dispenser  | Soap dispenser should be installed at a height that could be reached from sitting position.                              |  |  |
|  | Restrooms: Towel Dispenser | Towel dispenser should be installed at a height that could be reached from sitting position.                             |  |  |
|  | Restrooms: Floors          | Floors should be slip resistant and leveled.                                                                             |  |  |
|  | Family Facilities          | Spaces should be provided with diaper changing rooms, feeding rooms or just changing tables in either or both bathrooms. |  |  |
|  | Drinking Fountains         | Where present, drinking fountains should have operatable parts within reach and be usable from a seated position.        |  |  |
|  | Assembly Areas             | Areas like auditoriums must provide accessible seating, assistive listening systems, and barrier-free paths.             |  |  |
|  | Refreshment Facilities     | Counters at the refreshment facilities should be at a comfortable height for a person in a wheelchair.                   |  |  |

|                                 |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |
|---------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 5. Building fixtures & fittings | Signage                      | <p>Signs must include tactile characters and Braille, with high contrast and readable fonts.</p> <p>Signs should be well lit and of non-glare finish type.</p> <p>Symbols should be used to supplement written signs especially for sanitary facilities.</p> <p>Visual signs should comprise simple words, clearly separated from one another and short sentences should be used to convey the required information. Sentences or single word messages should begin with an upper case letter and continue with lower case letters. Words entirely in upper case (capital) should be avoided.</p> <p>Detailed signs or instructions, especially safety notices should be duplicated at high and low level, at 1400 mm to 1700 mm for a visually impaired person when standing and 1000 mm to 1100 mm for convenient close viewing by a wheelchair user.</p> |  |  |
|                                 |                              | <p>The international symbol of access must be adopted within all signs depicting this pictogram. The wheelchair figure must always face towards the right unless used in a directional sign indicating to the left.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |  |
|                                 | Alarms and Emergency Systems | <p>Emergency alarms should include both audible and visual signals to alert all patrons.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |  |
|                                 | Lighting                     | <p>Lighting should be adjustable, but with no abrupt changes in lighting levels or colours.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |

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|--|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | Control Panels      | Control panels such as light switches should be located within reach of a seated person.<br><br>Outlets, switches and other controls should be at least 400 mm from room corners. |  |  |
|  | Acoustics           | Acoustic conditions should be optimized to ensure inclusivity and prevent discrimination against individuals with hearing impairments.                                            |  |  |
|  | Inaccessible Spaces | Provision of information for individuals with disabilities of detailed descriptions of spaces that cannot be made accessible for them.                                            |  |  |
|  | Exhibition          | Art should be positioned at a comfortable viewing height regarding seated individuals.                                                                                            |  |  |
|  | Enhancement systems | Offering multiple channels - Braille, audio and video description - through which users can access information about the site or its artwork.                                     |  |  |

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| 6. Evacuation and Safe Egress | Emergency exits              | All buildings should have emergency exit routes that are accessible to all.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |  |
|                               | Refuge Areas                 | <p>Availability of refuge areas that provide a safe space where they can wait for professional assistance.</p> <p>The areas should be located on every floor, where a direct emergency exit is not accessible.</p> <p>Areas of refuge should be separated from the building floor by a fire separation having a fire-resistance rating of at least 60 minutes.</p> <p>Areas of refuge should have an exit via an emergency staircase or a fire-fighters lift.</p> <p>Areas of refuge should be at least 900 mm wide and 1200 mm deep and should be equipped with a telephone or communication system connected to an emergency response system.</p> |  |  |
|                               | Alarms and Emergency Systems | Emergency alarms should include both audible and visual signals to alert all patrons.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |  |
|                               | Evacuation Routes            | The building layout design must consider accessible evacuation routes, free of obstacles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |  |
|                               | Evacuation Elevators         | Evacuation elevators should be considered in the design of multistorey buildings to make evacuation easier for disabled people.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |  |

