

PRACTICAL GUIDE

The Equality Act: Making Church Buildings Fully Accessible

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1.0 Introduction

Most churches will be aware of the Disability Discrimination Act 1995, which is now part of the Equality Act 2010, but many do not know the extent to which the Act affects their fellowships. Since October 1999 people who provide goods or services (“service providers”) were required to make “reasonable adjustments” for people with disabilities, such as providing extra help or making changes to the way they provided their services. Service providers were also required by October 2004 to make “reasonable adjustments” to the physical features of their premises to overcome physical barriers to access. You as a church provide services (not just your Sunday meetings, but other activities) for the public and are therefore considered to be service providers under the Act.

Fifteen or so years later many churches have still not taken action to make reasonable adjustments. And many think that one-off provision of an accessible WC or a temporary ramp is enough. This paper will look at what disability discrimination is in relation to services offered by churches, what would be considered to be reasonable adjustments for churches to make and some examples of good practice.

2.0 The bigger picture

Quite apart from the legal requirement to make your property more accessible, you as a church should want to give people with disabilities (and those affected by disability, such as family members of people with disabilities) the same opportunity to hear the Gospel and to participate fully in the church’s life as anyone else. Indeed, by not providing facilities and resources, you imply that people with disabilities are not important to you or God and they will feel unwelcome.

Frequently people say that few, if any, people with disabilities attend their fellowship. This is very much a “chicken and egg” situation. The experience of many churches has demonstrated that once a church provides such facilities (not just for wheelchair users, but for people with other impairments), people with disabilities and their entire families start to attend.

There are many practical changes that you can make to your church building that will enhance the facilities, be more welcoming and be more comfortable for all people. You can do so much to facilitate full participation by everyone, including people with disabilities. For example:

- Provision of level access and lightweight doors means parents with pushchairs and elderly people benefit, as well as wheelchair users.
- A loop induction system means people with hearing aids have far greater opportunity to hear the spoken word. Beware, as this may include your neighbours as well.
- Good lighting benefits people who are deaf, have hearing impairment, are lip readers, are partially sighted or are elderly.
- Good colour contrast (between ceiling and walls) helps visually impaired people to get a proper perspective on the size of the room and can be an attractive design feature.
- A venue with good acoustics helps people with speech difficulties to be heard, as well as improving the sound of the music band/organ and congregational singing.



- A carpeted floor (providing the pile is smooth for wheelchair users) benefits many different groups of people with disabilities.
- Provision of helpful and clear signs and information benefits all users of your facilities. A brief guide to good sign design is shown in Appendix 1 below.



(Poor example)



(Good example)

3.0 Disability discrimination and the Equality Act 2010

Disability discrimination is when a person is treated less well or put at a disadvantage for a reason that relates to their disability in one of the situations covered by the Equality Act. These include:

- Direct discrimination – when you treat someone worse than another person in a similar situation because of their disability.
- Indirect discrimination – when you have a particular policy or ways of working that has a worse impact on people with disabilities compared to people who are not disabled.
- Discrimination by association – where you discriminate against a person who is connected with someone with a disability.
- Discrimination by perception – where you discriminate against someone because you think they have a disability.
- Harassment.
- Victimisation.
- Failure to make reasonable adjustments.

How you treat someone could be a one-off action, the application of a rule or policy or the existence of physical or communication barriers which make accessing something difficult or impossible. Discrimination does not have to be intentional to be unlawful. In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on a person's ability to do normal day to day activities. This includes where a person has a progressive condition like HIV, cancer or multiple sclerosis, even if they are currently able to carry out normal day to day activities.

Although churches may come across cases of direct or indirect discrimination, the focus of this practical guide is on the failure to make reasonable adjustments. Under the Equality Act, employers

and organisations have a responsibility to make sure that people with disabilities can access jobs, education and services as easily as non-disabled people. This is known as the duty to make reasonable adjustments. People with disabilities can experience discrimination if the employer or organisation does not make reasonable adjustment. This is known as a failure to make reasonable adjustments.

For example, an employee with mobility impairment needs a parking space close to the office. However, her employer only gives parking spaces to senior managers and refuses to give her a designated parking space. What is reasonable depends on a number of factors, including the resources available to the organisation making the adjustment. If an organisation already has a number of parking spaces, it would be reasonable for it to designate one close to the entrance for the employee. This would also apply to church car parks where you are expected to provide an accessible parking space near the entrance to the building.

4.0 Duty to make reasonable adjustments

Where a disabled person is at a substantial disadvantage¹ compared with people who are not disabled, there is a duty to take reasonable steps to remove or avoid that disadvantage by:

- Changing provisions, criteria or practices – for example provision of large print books or service sheets for people who are visually impaired and offering alternative arrangements for people receiving the bread and wine during church meetings.
- Changing or removing a physical feature² or providing a reasonable alternative way to avoid that feature – for example provision of a ramped access to the building.
- Providing auxiliary aids – for example provision of an induction loop system for those who are hard of hearing or chairs with armrests for people who have difficulty getting up.

An adjustment should, as far as possible, remove or reduce any disadvantage faced by a person with a disability using your services.

The Equality Act uses the word “reasonable” when referring to adjustments that need to be made. Examples as to reasonableness are given in Appendix 2 below, but broadly when considering whether an adjustment is reasonable, depends on all circumstances, including:

- How effective the change will be in avoiding the disadvantage the person would otherwise experience because of their disability.
- How practical it is for you as a church to make the adjustment and the disruption that is caused to your services (church activities).

¹ A substantial disadvantage is something that is more than minor or trivial.

² A physical feature is:

- A feature arising from the design or construction of a building.
- A feature of an approach to, exit from or access to a building.
- A fixture or fitting or furniture, furnishings, materials or equipment in or on the premises, or
- Any other physical element or quality.

- The church's resources and size, and resources already spent on providing access.
- The cost and whether financial support is available to help you make the adjustment.

The standards of physical accessibility to buildings given in Approved Document Part M (volume 2 – buildings other than dwellings) of the Building Regulations are considered to be a reasonable standard to achieve and therefore are the benchmark of what is deemed accessible. This document can be downloaded from the Planning Portal on:

https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings/2.

5.0 Enforcement and the Equality and Human Rights Commission

The Equality Act is not enforced by local authorities, but is a civil action enforced by the Courts. Legal action may therefore be taken by an individual against a service provider for failure to comply with the Act and an award for damages for injury to the disabled person's feelings may be made.

The Equality and Human Rights Commission is the regulatory body responsible for enforcing the Equality Act. A focus of its regulatory role is to help organisations achieve what they should, not to catch them out if they fall short. To help them do this, they have a range of powers. These include providing advice and guidance, publishing information and undertaking research. When these methods are ineffective, the Commission also has a range of enforcement powers. These powers are set out in the Equality Act and include investigations and court action. If you as a service provider do not fulfil your responsibilities under the Act, legal action could be taken against you by a member of the public or the Equality and Human Rights Commission. If an employer fails to meet their responsibility under the Act the employee may take them to an industrial tribunal.

6.0 Service provider responsibilities

A service provider must not discriminate against a person with disabilities, refuse to serve a person with disabilities or offer a lower standard of service. You as a service provider should take reasonable steps to change any practices (what the church actually does), policies (what the church intends to do) and procedures (how the church implements the practices and policies) that prevent people with disabilities from taking part in church activities (e.g. not allowing guide dogs into the building). You must also make reasonable adjustments to provide reasonable alternative methods of making church activities available to people with disabilities where physical features prevent people with disabilities from enjoying them (e.g. spaces in the seating for wheelchairs).

You must also take reasonable steps to provide auxiliary aids or services that will enable people with disabilities to take part in church activities (e.g. hearing induction loops, sign language interpreter or large print books). And lastly, you should make reasonable adjustments to physical features or provide reasonable alternative methods to enable people with disabilities to take part in church activities. This may mean the provision of ramps, lifts, sufficient room to enable a toilet to be wheelchair accessible and widening of doors and corridors.

7.0 Audit

If this has not already been done, it is recommended that you carry out an access audit, by going through the whole building and grounds (e.g. car park) to identify the often unsuspected barriers imposed on people with disabilities. Further information is available from Churches for All and Through the Roof (see their top tips on becoming an inclusive church in Appendix 3). One way to do

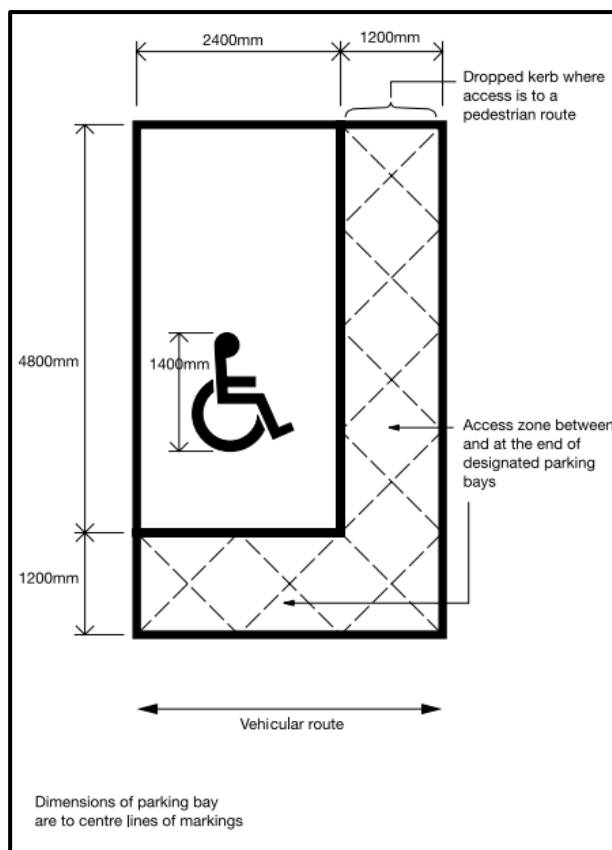
this might be to approach a secular organisation working with people with disabilities in your locality and invite them to help you with an audit; although they are unlikely to do so without charging. Church Growth Trust offers an access audit service, or you could try the National Register of Access Consultants (see section 11 for details).

8.0 Examples of areas that can be reviewed

Here are some examples of points to review with your property and services:

8.1 Car park

- Check there are no hazards or obstructions to visually impaired people.
- Is the surface suitable and even? Are edges or drops in level clearly marked?
- Have you provided accessible parking space(s) near the entrance?
- Is there suitable lighting in the car park and around the building?



8.2 Physical access to and within the building

- Are there compliant ramps (e.g. not too steep) and handrails to steps?
- Is there a platform and space at the top of ramps to allow doors to be opened?



- Are the widths of accessways and doors sufficient to allow passing and turning for wheelchair users?
- Are there obstacles at low level or not easily visible that need removing (or clearly marking, if not possible to remove)?
- Are the edge of steps clearly marked? Are unnecessary marks or changes in colours removed to reduce confusion?

See Church Growth Trust's practical guide on disabled access ramps and entrance steps for church buildings.

8.3 Toilets

- Have you provided (ideally unisex) accessible WCs for people with disabilities, whether they are using a wheelchair or not?
- Do the accessible WC doors open outwards and are they wide enough?
- Does the accessible WC have an alarm?
- Is there an accessible WC on each floor and close to the main meeting areas?

NB it is not discriminatory not to provide an accessible WC, if one is not provided for anyone else either.



See the top ten tips for installing accessible WCs in Appendix 4 below, the diagrams for an accessible WC from the Building Regulations in Appendix 5 and Church Growth Trust's practical guide on accessible WCs within church buildings (see section 11 for the link).

8.4 Seating

Have you left spaces for wheelchair users and have you provided some chairs with armrests (e.g. for people with arthritis)?

8.5 Lighting

- Is the lighting good for access routes and emergency exits?
- Is there sufficient lighting for reading books and is the speaker's face lit to enable lip reading?

8.6 PA system

- Have you provided in the main meeting room(s) an induction loop system? Do you tell visitors that you have one?
- Have you considered recording or live streaming meetings for people confined to home?

8.7 Books and projectors

- Do you provide large print (Sans Serif typeface at 18pt)(and braille) books, service and notice sheets?
- Is your digital projector at 30pt type and do you use upper and lower case?
- Is the screen visible for people who are seated?

8.8 Noticeboard and publicity

- Do your signs and publicity use upper and lower case (as this helps people with dyslexia)?

- Do you use contrasting colour paper (e.g. black on white or black on pale yellow) on matt paper (as this helps people with dyslexia)?
- Are your signs clear and at consistent levels?

8.9 Website

- Do you keep the number of typefaces to a minimum?
- Do you use background white or pale pastel colours?
- Do you use Sans Serif typeface that is not too small?

8.10 Children

Are your facilities and services available for children with disabilities?

9.0 Management and training

Making the church's property and "services" accessible is not only reliant on physical alterations to the building, but also on positive and proactive management by you as a church. There are a number of practical actions you can take to manage access and train people within the church; many of these will not cost anything to implement. Some examples are shown below:

9.1 Decorating

Decorating of each room should be carried out as and when required. The decorating programme should incorporate good colour contrasts between ceiling and walls, and walls should not be too "busy".

9.2 Cleaning

Damaged surfaces should be carefully monitored and repaired as soon as possible, particularly damage to floors where this could cause people with mobility difficulties or partial sight to trip. Floor surfaces should not be polished to create slippery surfaces or shiny surfaces (which give the appearance of being slippery).

9.3 Changing light bulbs

The caretaker or other responsible person should be given responsibility for checking light bulbs on a regular basis and changing as required to ensure that areas are properly lit.

9.4 Welcoming (lip reading, directing)

All public events should have someone at the entrance to welcome and help people with disabilities to enter the building. There should be adequate preparation, ensuring the lights are working, the entrance and other areas are lit properly, large print books are available, having pencil and paper ready for communicating with people who are deaf, spaces for wheelchair users are cleared etc. The welcome people should also be "trained" to make the people with disabilities as comfortable and welcome as possible, ensuring the welcomer's face is in the light and that they do not over emphasise their words with someone who is lip reading. They should make people with disabilities aware of the facilities that are relevant to them. In due course training on signing may be beneficial.

9.5 Signage

Ideally there should be a consistency with signs around the building and they should be placed at an appropriate height on the wall, so that wheelchair users can read them. There

should be use of symbols as these are easy to understand and there should be a mix of upper and lower case for people with dyslexia. The lettering should be contrasting with the background and not cluttered.

9.6 Access routes (obstructions)

Access routes should be kept clear and monitored by the caretaker or other members of the fellowship. This should be an ongoing process to ensure that people with partial sight do not trip on obstacles or access routes are blocked to wheelchair users. Unnecessary mats, misleading colour schemes or unnecessary changes in levels should be avoided on access routes. Fire exits and WCs should be clearly signposted.

9.7 Training

Training generally should be an ongoing process of making people aware of the Equality Act requirements and encouraging the whole church to make the facilities as accessible and welcoming as possible.

9.8 Supervision

Clear responsibilities should be given for dealing with the above issues.

9.9 Monitoring

An access audit is the start of the process (see section 7 above) and action should be monitored on a regular basis of at least once a year.

9.10 Emergency

Plans should be made for dealing with emergencies, resulting from a person with a disability using the property. This will range from someone falling from their wheelchair to perhaps someone having an epileptic fit.

10.0 Funding and VAT

There are still various sources of funding for churches to make improvements to your building, to ensure it is accessible for people with disabilities. It is worth contacting your local authority, social services department and any local disability charities, who may be able to provide names of grant-making bodies. Through the Roof have a webpage which gives suggestions of grant-funders (www.throughtheroof.org/2017/10/10/obtaining-funding-to-make-disability-related-improvements).

Work to church buildings to provide access for people with disabilities (e.g. ramps, accessible WC or widening doors) are zero-rated for VAT and an appropriate certificate needs to be served on the contractor for the contractor to be able to obtain zero-rating on supplies, as well as his labour.

11.0 Additional information

Advice on accessible issues can be obtained from local authority Access Officers (usually based in the Building Control Department), disability action groups or from the government agencies (see below). Advice on suppliers of specialist equipment can be obtained from Through the Roof (www.throughtheroof.org/forchurches/).

Church Growth Trust has other practical guides on disability access, including:

- Disabled Access Ramps and Entrance Steps for Church Buildings

- Corridors and Internal Doors in Church Buildings
- Accessible WCs within Church Buildings

They can be found on the website: <https://churchgrowth.org.uk/area/disability-access/>

Useful contacts are as follows:

The Equality and Human Rights Commission

Correspondence Unit
Fleet Bank House
2-6 Salisbury Square
London EC4Y 8JX
Tel: 020 7832 7800
Email: correspondence@equalityhumanrights.com
Website: www.equalityhumanrights.com

National Register of Access Consultants

The Construction Industry Council
Second Floor, The Building Centre
26 Store Street
London
WC1E 7BT
Tel: 020 7399 7417
Email: info@nrac.org.uk
Website: www.nrac.org.uk

Centre for Accessible Environments

Holyer House
20-21 Red Lion Court
London
EC4A 3EB
Tel: 020 7822 8232
Email: info@cae.org.uk
Website: www.cae.org.uk

Go! Sign (previously Christian Deaf Link UK)

Go! Sign Office
5 Lyndale Avenue
Southend-on-Sea
SS2 4BY
Tel: 07303 613113
Email: gosignoffice@gmail.com
Website: www.gosign.org.uk

Creating a network of information to support deaf people using British Sign Language and promoting full participation of deaf people into church life and communities.

Through the Roof

Alpha House
Alpha Place
Garth Road
Morden

Surrey

SM4 4TQ

Tel: 01372 749955

Email: info@throughtheroof.org

Website: www.throughtheroof.org

Transforming lives through Jesus with disabled people.

Churches for All

Email: enabledchurch@gmail.com

Website: www.churchesforall.org.uk

A network of UK disability engaged organisations.

Livability

6 Mitre Passage

London

SE10 0ER

Tel: 020 7452 2000

Email: info@livability.org.uk

Website: www.livability.org.uk

Connecting people with learning disabilities to their communities.

The Torch Trust for the Blind

Torch House

Torch Way

Northampton Road

Market Harborough

LE16 9HL

Tel: 01858 438260

Email: info@torchtrust.org

Website: www.torchtrust.org

Working together to enable people with sight loss to have fulfilled Christian Lives.

Appendix 1 - Brief Guide to Good Sign Design - “The four ‘C’s of sign design”

1. Clarity

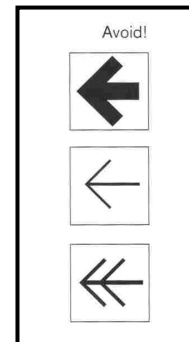
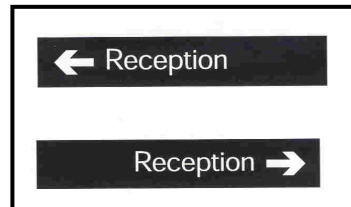
(a) Keep signs simple

- Fancy designs and changes in font only confuse
- Use words which will be understood

(b) Use arrows – directional signs need arrows

(c) Ensure sign is well-lit

- But avoid glare from sunlight or artificial light
- Use matt finishes



(d) Avoid abbreviations

(e) Ensure signs are not obstructed or become obstructions themselves

(f) Consider distance from where sign needs to be read and therefore size of print

2. Concise

(a) Keep brief

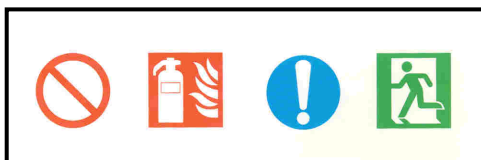
- Avoid long lists
- Avoid complicated instructions

(b) Use symbols

E.g.



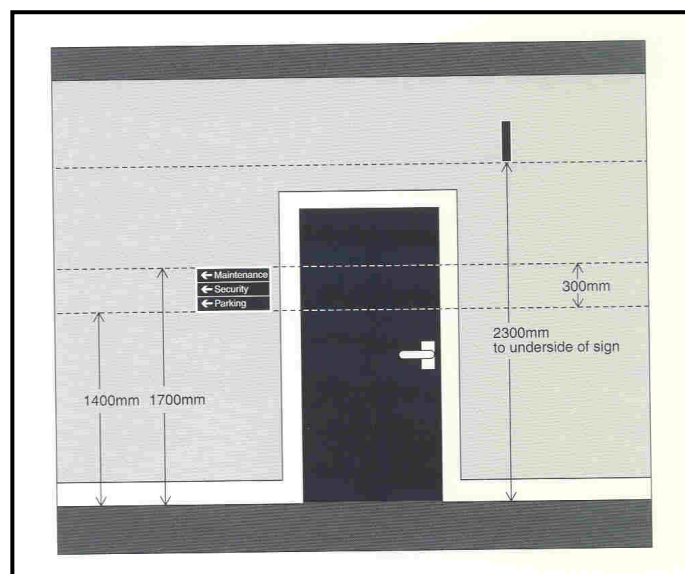
Fire and safety signs are sometimes in mandatory formats:



3. Consistent

(a) Use similar sized signs

(b) Put signs in the same position/location e.g. heights

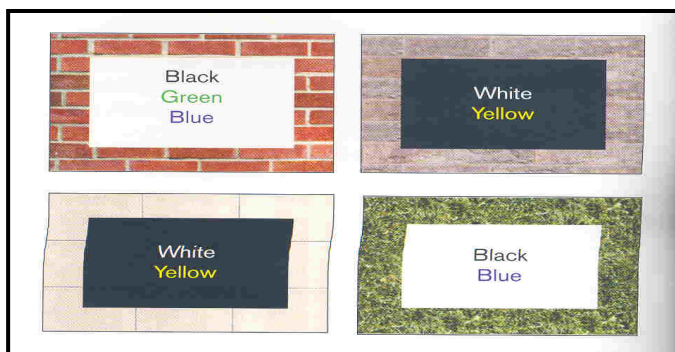


(c) use same typeset/font and colours for main signs

- Sans Serif typefaces such as Arial, Avant Garde and Helvetica have consistent letter thickness and are neither too heavy not too thin.
- Some of the most legible serified typefaces include: Baskerville, Bembo, Century Schoolbook and Times New Roman.
- Avoid:

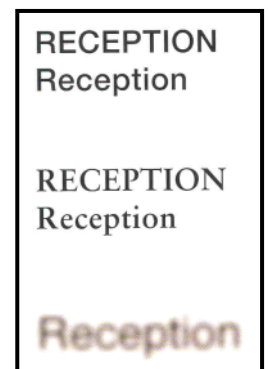
Old English is exaggerated
Italic are not very clear
This face is too condensed
Scripts like this are illegible

(d) Colour contrasts should be carefully selected between the background and the signboard and between the signboard and the text or symbol on it. Examples:



4. Capitals

- (a) Avoid using only capitals (uppercase). Words are easier to recognise if lower case letters are used.
- (b) Some words like EXIT are required in capitals by legislation.



Examples have been taken from the Sign Design Guide – a guide to inclusive signage by Peter Barker and June Fraser (illustrator Mark Booth). The Sign Design Guide is available from the Sign Design Society (<https://www.signdesignsociety.co.uk/book/the-sign-design-guide/>), 44 Victoria Road, Mitcham, Surrey CR4 3JA tel: 0203 488 0774, e-mail: enquiries@signdesignsociety.co.uk.

Appendix 2 – Examples of reasonable adjustments

1. An assistant in a small shop refuses to serve a disabled person, arguing that a nearby shop can offer a better service to disabled people. This is a refusal of service and likely to be against the law.
2. A disabled person with a learning difficulty wishes to book a hotel room. The hotel receptionist pretends that all rooms are taken in order to refuse his booking because of his disability. This is likely to be against the law.
3. A nightclub with low-level lighting is not required to adjust the lighting to accommodate customers who are partially sighted if this would fundamentally change the atmosphere or ambience of the club.
4. A video rental shop allows only people who can provide a driving licence as proof of their identity to become members. This automatically excludes some people with disabilities from joining because the nature of their disabilities prevents them from obtaining a driving licence (e.g. people with sight loss or some people with epilepsy or mental health problems). The shop would be required to take reasonable steps to change this practice. It does so by being prepared to accept alternative forms of identification from its customers. This is likely to be a reasonable step for the shop to have to take.
5. A hotel refurbishes a number of rooms on each floor which are fully accessible to disabled guests. However, the hotel's reservations system allocates rooms on a first come first served basis as guests arrive and register. The effect is that on some occasions the specially adapted rooms are allocated to non-disabled guests and late-arriving disabled guests cannot be accommodated in those rooms. The hotel decides to change its reservations policy so that the accessible rooms are either reserved for disabled guests in advance or are allocated last of all. This is likely to be a reasonable step for the hotel to take.
6. A building society provides audio information about its savings accounts on a CD. A customer with a visual impairment can use the CD at home or in a branch to decide whether to open an account. This is an auxiliary service.
7. A petrol station decides that an assistant will help people with disabilities use the petrol pumps on request. It places a prominent notice at the pumps advertising this. This is an auxiliary service.
8. A cinema offers patrons a telephone booking service. Its booking office installs a text phone and trains staff to use it. This offers access to patrons with hearing impairment and is likely to be a reasonable step for the cinema to have taken.
9. A church is located in a listed building whose front entrance is only accessible by climbing a flight of stairs. At ground level there is a bell and a sign saying, "Please ring for disabled access." However, the bell is not answered promptly, even in bad weather, so that a disabled person often has to wait for an unreasonable time before gaining access to the building. This is unlikely to be a reasonable means of avoiding the feature.
10. A service provider occupies premises under a lease, a term of which says that the service provider cannot make alterations to the staircase. When deciding whether or not it was reasonable for the service provider to make an alteration to the staircase in order to make it accessible to people with disabilities, a court will ignore the terms of the lease unless the service provider has written to the lessor for and been refused permission to make the alteration.

11. Although there are adequate means of escape, a cinema manager turns away a wheelchair user because she assumes, without checking, that he could be in danger in the event of a fire. Although she genuinely believes that refusing admission to wheelchair users is necessary in order not to endanger the health or safety of either the person with disabilities or other cinema goers, the cinema manager has not made enquiries as to whether there are adequate means of escape. Her belief is therefore unlikely to be reasonably held. In these circumstances, the refusal of admission is unlikely to be justified.
12. A restaurant changes its menu daily. For that reason, it considers it not practicable to provide menus in alternative formats, such as Braille. However, its staff spend a little time reading out the menu for customers with sight loss and the restaurant ensures that there is a large print copy available. These are likely to be reasonable steps for the restaurant to have to take.

Appendix 3 – Through the Roof's inclusive principles

Through the Roof encourages churches and the Christian community to ensure that disabled people are included in every aspect of church life, by:

1. Welcoming and being open to disabled people so they feel they 'belong';
2. Offering reserved parking/a drop-off point;
3. Having 'step-free' access giving level/ramped entry to a building;
4. Providing accessible toilets;
5. Having a loop system in operation and, when required, providing sign language interpreters and/or speech-to-text (captioning);
6. Using straightforward, jargon-free language;
7. Supplying written information (including that on a screen) in large print (font size 18 point) and other alternative formats (e.g. audio, electronic, Braille);
8. Ensuring that there are clear/pictorial signs (for people with learning disabilities);
9. Having a quiet space available during the main meeting for those who may need time-out (for people on the autistic spectrum);
10. Having good, even, glare and flicker-free lighting to benefit people with sight loss or autism;
11. Offering seating (some with arms) near the entrance/exit;
12. Providing a named contact to 'champion' issues and initiate training on disability (e.g. a Roofbreaker, which Through the Roof can support with a free starter kit, and monthly email ideas and encouragement. Find out more: <https://www.throughtheroof.org/forchurches/roofbreakers/>;
13. Speaking directly to disabled people, assuming nothing and asking them how they are best supported and included;
14. Ensuring there is commentary/audio description for purely visual content to those unable to see the screen/stage;
15. Ensuring the website is accessible and has information that helps disabled people access the building and activities;
16. Adopting a can-do culture with an inclusive ethos, valuing all and addressing each person's needs on an individual basis;
17. Intentionally encouraging and enabling disabled people to contribute to church life using their God-given gifts

Appendix 4 – Tips on installing accessible WCs

When installing a new accessible (disabled) WC the following is suggested:

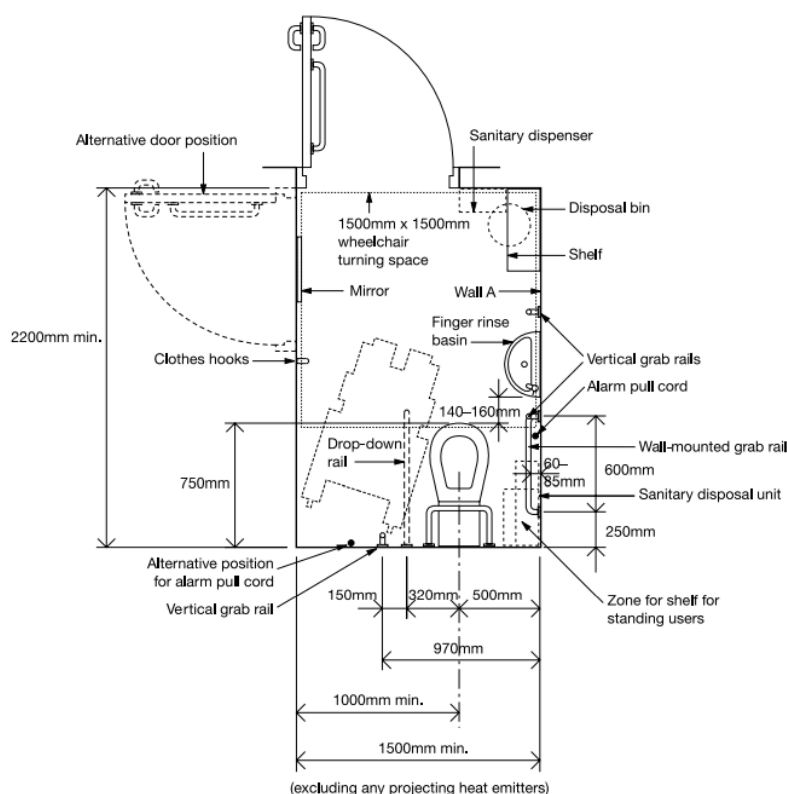
1. You use the blue coloured handrails, as you are supposed to have a colour contrast with the walls.
2. You ensure you have an alarm. The pull cord should be within reach of the floor in case someone falls over.
3. You make sure the flush (if a handle) is on the side where the person in the wheelchair will be.
4. You ensure there is room on one side (as well as in front) of the WC for someone in a wheelchair.
5. You ensure the wash basin is within reach of the WC, so the person does not have to get back into wheelchair before washing their hands. The drying facility should also be within reach.
6. You install tap(s) with lever handle(s).
7. You use this type of lock for the door.



8. You ensure any nappy changing table does not get in the way of the wheelchair access (ideally this should fold up).
9. You ensure the door opens outwards.
10. You do not forget the shelf for changing colostomy bags.

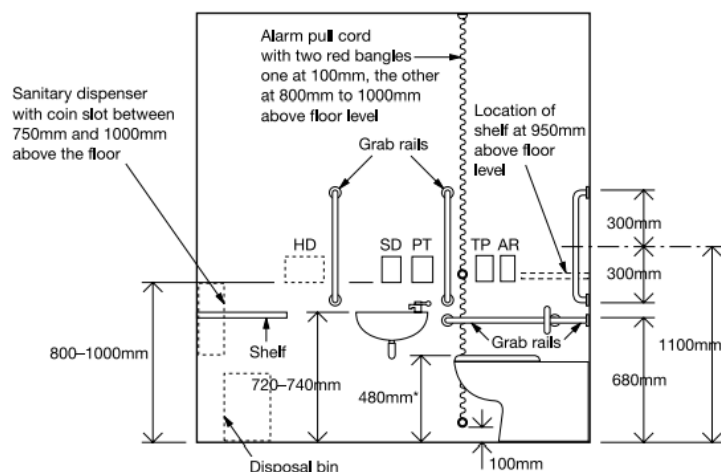
Appendix 5 – Building Regulations drawings for accessible WCs

Unisex wheelchair- accessible toilet with corner WC



Note
Layout for right-hand transfer to WC

Height and arrangement of fittings in a unisex wheelchair-accessible toilet



*Height subject to manufacturing tolerance of WC pan

HD: Possible position for automatic hand dryer (see also Diagram 20)

SD: Soap dispenser

PT: Paper towel dispenser

AR: Alarm reset button

TP: Toilet paper dispenser

Height of drop-down rails to be the same as the other horizontal grab rails