

# All Party Football Group Inquiry into Football Governance

NADS Evidence – 19.06.08

## Disabled supporter facilities – evidence given by Joyce Cook, Chair of the National Association of Disabled Supporters on 19<sup>th</sup> June 2008.

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1. The National Association of Disabled Supporters (NADS) a registered charity which was established in 1998 to represent disabled football supporters across all disabilities. Our key objectives are to promote an inclusive agenda and to campaign for an equality of supporter experiences for all fans.
2. We estimate that more than 30,000 disabled fans regularly attend football matches in England. This is in our view a conservative figure and we are not aware of any official statistics for disabled sports spectators. We also believe that many disabled people still do not realise that they can attend a match. Quite simply going to a game of football can be life changing for many disabled people. We have many empowering personal testimonials to this fact with lives being transformed. Often it is the first introduction to the excellent community works at some clubs including disabled football coaching and teams.
3. As far back as, 1990 Lord Taylor in his Final Report in response to the Hillsborough Stadium Disaster made several recommendations:
  - There should be provision for safe, spacious seating for wheelchair users with a seat alongside for a companion, protected from the weather, accessible to disabled toilets and easily reached from a car park. Facilities should also address needs of the ambulatory disabled and the visually and hearing impaired.
4. In 1998 the Football Task Force published a report, Improving Facilities for Disabled Supporters. Some of you here today were part of that working group making a number of significant recommendations. Amongst these you:
  - Suggested there should be further clarity to Part M in accordance with the Green Guide, seeking to put right and set mandatory requirements on minimum numbers of wheelchair spaces, and seats for blind, deaf and ambulatory disabled people in new stands and stadia.
  - Recommended improvements for fans of all disabilities in line with the DDA, including views, shelter, access, toilets, refreshment bars, parking, ticketing and stewarding.
  - Annual visit of 'hit squads' to all grounds to conduct audits of facilities and to monitor progress on improvements with a proposal that NADS should carry out these assessments.
5. Alongside legislation such as the revisions to Part M Building Regulations and the Disability Discrimination Act, there have been a number of excellent reports, surveys and guidance documents produced, including Designing for People with

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Disabilities, Fans at the Track Side, Leaving the Trackside and in 1997 the Guide to Safety at Sports Grounds (4th Edition) - 'Green Guide'.

6. Most significantly, in 2003-04 the Accessible Stadia Guide (ASG) was published in partnership, by the Football Licensing Authority and the Football Stadia Improvement Fund, with a working group of representatives including those from across the football family. The ASG provides guidance on the design of facilities to meet the needs of disabled spectators and others. It was imbued into Part M of Building Regulations in 2004. It stands today as a best practice guidance for all clubs.
7. In 2000-02 NADS carried out access appraisals of all clubs in the professional game with funding from the Football Stadia Improvement Fund.
8. We understand that further to advice from football's governing bodies most football clubs carried out their own access audits in and around 2004 and in anticipation of DDA Part 3 amendments.

Some clubs have continued to make improvements to the facilities they provide disabled supporters, however we fear that many may have put these reports away and have not since followed a considered access strategy for continued improvements in line with their evolving duty under the DDA.

9. If I can quote from the previous Disability Rights Commission's own DDA Code of Practice:

*6.22 The duty to make reasonable adjustments is a continuing duty. Service providers should keep the duty under regular review in light of their experience with disabled people wishing to access their services. In this respect it is an evolving duty, and not something that needs simply to be considered once and once only, and then forgotten. What was originally a reasonable step to take might no longer be sufficient and the provision of further or different adjustments might then have to be considered.*

*7.34 .....Where there is a physical barrier, the service provider's aim should be to make its services accessible to disabled people and, in particular, to provide access to a service as close as it is reasonably possible to get to the standard normally offered to the public at large.*

10. Some clubs have made good progress and it is important to emphasise areas of best practice that exist. In fact NADS works hard to encourage the sharing of such information and this was the case earlier this year when the Football Association hosted the first ever Disability Equality Seminar bringing together club representatives, disabled supporters and the football authorities. Its early days; however what is apparent is that many clubs want to do more, such as Manchester City who have expressed a desire to work closely with NADS and some are using the resources they have to ensure their disabled fans have a good

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experience. Clubs such as; Wycombe Wanderers, Ipswich Town, Norwich City and others who work hard to achieve best practice.

11. Last autumn we presented the preliminary NADS State of the Game report to you and since then with your support there have been a number of questions, both the Lords and the Commons, following a very well supported Early Day Motion 615 - Facilities for Disabled Football Supporters which 107 signatures to date. As a result the Minister for Sport wrote to the Premier League, Football League and the Football Association asking for their help to ensure that all grounds in the Premier and Football League meet their obligations under the DDA. He also asked that they remind all clubs about the Accessible Stadia Guidance and noted that it was published to help clubs undertake access audits to identify features which present barriers to people with disabilities and to develop effective solutions. The Minister also asked that clubs work with disabled supporter groups to ensure that the experience of visiting their ground is equal for both disabled and able-bodied fans.
12. The first NADS State of the Game report provides an overview of current provision for disabled supporters in the Premier League as this seemed a good place to start.
13. Most people will think of someone in a wheelchair when mentioning disability. It is important to emphasise that there are many disabilities to be considered and that being a football fan means being able to access all experiences equally from buying a ticket, to match day, to visiting club shops and museums and to accessing and enjoying club TV, websites, programmes and so on.
14. In summarising, current facilities in the Premier League, it is important to share a few key points of our most recent and best available information and as described in the State of the Game report:
  - Only 2 Premier League (PL) clubs offer full audio described commentary systems for the visually impaired
  - Very few clubs provide for assistance dogs
  - Only 3 PL clubs match or exceed the ASG guidance for the recommended number of wheelchair seats with 2 of these clubs offering only pitchside seats
  - 33% of PL clubs only offer pitchside (not elevated) seating to wheelchair users with views blocked by stewards, police, players warming up and no shelter from the rain or ball. If you are disabled it can be very difficult to get out of the way
  - Many elevated viewing platforms suffer from poor sightlines if supporters in seats in front stand. This means that you miss all the key points of the game. This affects ambulant disabled, elderly and young fans as well.
  - 40% of PL clubs sit away disabled supporters with the home fans, this gives a very different experience. You don't feel close to your fellow supporters which is part of the enjoyment of being a fan. Home supporters often shout abuse

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- and it is not uncommon to be told not to celebrate goals by stewards so as not to incite the crowd
- 50% of PL clubs offer single digit seats to away wheelchair users, some as low as 3
- Many club websites are not fully accessible and audio programmes are only available at a few clubs
- Many clubs do not provide an adequate service for hearing impaired fans
- A few do not fully understand the needs of those with learning difficulties

15. There is an opinion from some people in the game that what we are asking for cannot be achieved because stadia are old and nothing can change until clubs move. I would like to draw your attention to clubs such as Everton, a club not too far from moving, who added an elevated wheelchair platform last season and Port Vale who despite dropping to the First Division this year are adding 20 wheelchair spaces. We firmly believe that with the will and some careful planning a great deal can be achieved and certainly that which is reasonable.

16. Without doubt all clubs should be able to provide a full audio described service and we would like to see TV companies such as the BBC, ITV and Sky extend the audio commentary, already afforded to certain popular programmes, to sports. It makes a huge difference to the blind or visually impaired spectator. Likewise hearing impaired supporters could be better accommodated with, for example, subtitling available as a viewing option.

17. There is also an often misquoted defense that many non-disabled fans can't get tickets to games. While it is true that some clubs are routinely sold out there is no comparison to that which some disabled fans face. If you look at the clubs at the top half of the PL - one has had to close their wheelchair user membership as they are already oversubscribed six fold and we fear for how many have absolutely no access to tickets. Last season this club did not sell out to its non-disabled members for its local derby, so went to a general sale and still did not sell every ticket. This unequal deficit in demand and supply is similar for the other top clubs.

18. Another argument is that why build extra disabled seats, they won't be filled. If I can draw your attention to Shrewsbury Town - who were very nervous about putting the ASG quota into their new stadium and their recent quote. *'.....we have been delighted by the much increased attendance by people with disabilities who may have previously been deterred by the limited facilities at Gay Meadow'*.

19. NADS would like to propose a plan for change that we believe most clubs would be keen to take up. The goal would be to achieve equal access and experience for all supporters.

- Firstly, there should be an independent access audit of all clubs, their facilities and services, with the necessary improvements identified and 'costed' and a clearly defined business plan described.

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- Secondly, together with disabled supporters and all stakeholders an agreement will be found as to what is truly achievable and reasonable and a timeline agreed.
- A central fund should be set up to help clubs lower down the pyramid to assist them in making the necessary improvements. This could come from football and or Government. Above all we are football fans and would not want to push any club into the abyss.
- Finally, the independent assessors should monitor progress at each and every club and ensure that improvements are made.

20. In 12 years football managed to convert most stadia to all seated after the terrible tragedy, Hillsborough. When football and government put their mind to a project, anything is possible. We must join together to put things right for our disabled supporters.

21. Again I want to acknowledge those in the game who work hard to accommodate their disabled supporters and the many that are keen to do more. In fact our national stadium, Wembley, stands as a glowing example for all, with world class disabled facilities.

22. Football has led the way in other areas of diversity such as anti racism and has the opportunity to lead the way for disabled people. Speak to any disabled person or their family or friends; no matter what their disability they will describe a life full of hurdles. In fact it is the environment around them that is disabling, rather than the person disabled.

23. One last point I wish to raise is funding for NADS. We currently receive a very welcome grant from the Football Foundation towards the cost of a part-time administrator. Beyond that we currently have to rely on the good will of volunteers and our own fundraising. The work we are doing and our campaigning are of huge importance to football and all supporters, we have an ageing population and the demands from those who are disabled and elderly will only grow. Therefore, I ask for your help in securing core funding for NADS in line with other supporters groups so that we can continue this extremely important work and continue to support disabled supporters, the clubs and the football authorities.

### **Additional written evidence – response to questions asked by the APFG during the Inquiry.**

#### **Club audits**

24. NADS feels strongly that there should be an official and independent audit of all professional clubs. In our view, The Football Licensing Authority would seem the ideal independent body to conduct these audits, considering best practice access guidance as described in the ASG and ensuring that all aspects were assessed.

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25. As is good practice in designing any new build or making improvements to an existing building – there should also be an access panel of disabled users for this project. We propose that NADS would be the ideal consultants with local disabled supporters also involved. As the national representative body for all disabled supporters, with adequate funding, it would be sensible for NADS to play a key part in this project.
26. It is important to emphasize the compromised position that some disabled supporters face in dealings with their own club. At some clubs, disabled ticketing is managed for example by the Disabled Liaison Officer, rather than more independently by the ticket office and the rules of allocation do not always follow those for non-disabled fans. Disabled supporters can feel vulnerable and scared to offer constructive criticism for fear of not getting tickets.
27. When a club receives a Football Stadia Improvement Funding grant then it is a condition that NADS is consulted. This should be extended to include all new stadia and improvements. It is a good solution and allows for a more independent consultation with supporters alongside local disabled fans. NADS also has considerable experience in looking at architects drawings and understanding legislative and best practice guidance.
28. Following an access audit, it is also important to identify a business plan or access strategy - the building works that would need to be carried out to ensure equal access in line with the Accessible Stadia Guidance and the costs involved.
29. It seems to NADS that clubs fear the expense involved and it may well prove that many improvements are not prohibitive. Where finances prove to be an issue for individual clubs, then there should be a fund similar to the Football Stadia Improvement Fund.
30. This particular funding source (FSIF) currently stands at around £5.5 million per annum and is 'for major development projects and projects to make necessary safety improvements'. Our understanding is that the current 'FSIF pot' would not sustain applications from clubs to complete outstanding access works. Perhaps in the short term to resolve the access improvement requirements, this fund could be increased. Clubs that need such support would require it once only. In the longer term and once an equal facility had been achieved then future inclusive access would be part of any improvement or new build.

### **Who should manage this overall?**

31. NADS believes that leadership should come from the very top - from government and football's governing bodies and the club Chairmen and their Directors.
32. Most recently a top Premier League club built new extensions to its existing facilities and only provided disabled seating in line with the new seating. This club,

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like many in the Premier League, does not come close to meeting seating recommendations within the best practice guidance of the ASG and there is a real deficit in equal access. They overlooked a very real opportunity to address this inequality. The local council had no legislative (buildings regulations) power to look at the overall stadia provisions and could only monitor the new build. The ASG (Part Four: Appendix 1 – Worked Example 3) best practice guidance provides an excellent strategy example for this very situation.

33. In our view, the football authorities need to be more forceful in ensuring that their clubs provide equal access in line with the ASG and meet their evolving duty as described in the DDA part 3 to disabled supporters. Some would say that each club is an individual business and as such makes its own decisions on equal access. We believe that football's governing bodies should do more in insisting that clubs comply and within a given timeline. If they truly are not in a position to enforce this, then perhaps this area of governance within the game needs to be urgently reviewed to ensure that disabled football supporters are treated equally.
34. We understand from our recent meeting with league representatives and in response to the Sports Minister's recent letter. The Premier League will be sending a copy of the ASG to their clubs ahead of the new season and the Football League will be asking their clubs to provide them with the numbers of disabled seats available in comparison to the ASG.
35. We recognize many individuals 'at the sharp end' within football clubs, who are keen and willing to do more. They may not be able to directly influence the Board or to put a strong business case to the decision makers for the changes required to ensure equal access.
36. Unfortunately, it seems that many clubs are driven only by profit and shareholders demands and at the other end of the pyramid struggle for financial survival. Therefore it is quite possible that at many clubs the issues relating to equal access have not even 'hit the radar' or been seen as a priority from those that can really drive the change.

## NADS core funding

37. It is important to emphasize the considerable amount of support we give to the football authorities, clubs and disabled supporters on a daily basis. As well as running a well used 0845 and email helpline, we provide disabled supporters and clubs with football and disability information and news and encourage feedback on any issues they may have. Many disabled supporters and their carers and football clubs come to us to ask us to mediate and for advice in issues that may arise. We receive calls from disabled fans who for one reason or another do not feel able to raise an issue directly with either their club or the football authorities. NADS sits on a number of access groups and meets regularly with the football authorities. Further, we are consulted for any FSIF grant assisted new build or improvement.

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This is in addition to our considerable campaigning responsibilities and any key projects.

All of these require considerable financial and human resources.

38. Core funding is essential to any charity or organization and difficult to secure. We are uniquely placed within football both in our experiences and understanding of disability issues and the needs of disabled supporters.

Joyce Cook  
Chair  
NADS

21.06.08