



Determination 2014/057

Dispute about provision of an accessible reception counter to a Corrections facility at 20 Johnston Street, Greymouth

1. The matter to be determined

- 1.1 This is a determination under Part 3 Subpart 1 of the Building Act 2004¹ (“the Act”) made under due authorisation by me, John Gardiner, Manager Determinations and Assurance, Ministry of Business, Innovation and Employment (“the Ministry”), for and on behalf of the Chief Executive of the Ministry.
- 1.2 The parties to the determination are
- the owner of the building, the Department of Corrections, acting through GHD Ltd (“the applicant”); an employee of GHD Ltd is also the licensed building practitioner for the work concerned
 - Grey District Council (“the authority”), carrying out its duties as a territorial authority or building consent authority.
- 1.3 This determination arises from an application for a building consent for alterations to an existing building. Prior to the authority processing the consent application it sought confirmation from the applicant as to whether a waiver or modification would be sought for Clause G5.3.4² of the Building Code (Schedule 1, Building Regulations 1992) in respect of the proposed reception counter. The consent was granted and the counter has been constructed; the applicant is seeking a determination on compliance and requesting a waiver under section 69(2) on the requirement in section 118 to provide an accessible counter.
- 1.4 The matter to be determined³ is therefore whether the reception counter complies with Clause G5.3.4 to the extent required by the Act, and whether a waiver should be granted under section 69 of the Act. In making my decision I must also consider whether section 118 applies.
- 1.5 The applicant has referred to a number of similar facilities ‘being upgraded / installed nationally’ and is seeking clarity on the issue of accessible counters in such facilities. I note here that that the Chief Executive has the power to grant waivers or modifications, but only in respect of an existing building (see section 69(1)(a)). For a new building and new building work the Act requires full compliance with the provisions of the Building Code that relate to access and facilities for people with disabilities.

¹ The Building Act, Building Code, compliance documents, past determinations and guidance documents issued by the Ministry are all available at www.dbh.govt.nz or by contacting the Ministry on 0800 242 243.

² In this determination, unless otherwise stated, references to sections are to sections of the Act and references to clauses are to clauses of the Building Code.

³ Under sections 177(1)(a) and 69(2) Act

- 1.6 The Office for Disability Issues ("the ODI") at the Ministry of Social Development has been included as being a Department with which the Chief Executive must consult under section 170 of the Act.
- 1.7 In making my decision, I have considered the submissions of the parties and the other evidence in this matter. The relevant sections of the Act and clauses of the Building Code are set out in Appendix A.

2. The building work

- 2.1 The building work consists of alterations to an existing building. The building provides a 'Community Corrections Service' facility where staff manage community-based offenders and where offenders meet probation officers.
- 2.2 The building contains office space, a reception and public waiting area, interview rooms, staff lunch facilities, toilet facilities including two accessible toilets, a kitchen, storage spaces, and a garage.
- 2.3 The existing building is single level with ramp access to the reception area. The building work includes internal alterations and the construction of a new reception counter. The counter, which has already been constructed, is 1200mm high with a 400mm counter top (refer Figure 1).

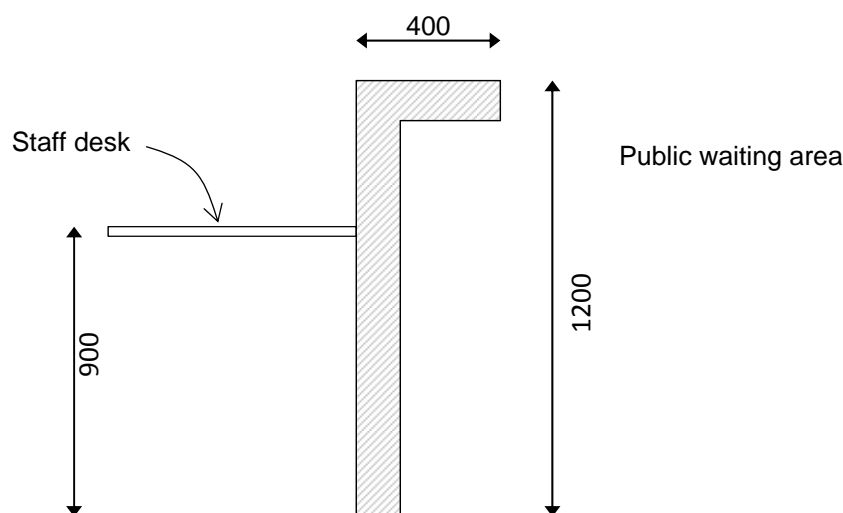


Figure 1: Section through new reception counter (not to scale)

- 2.4 The reception area serves as a waiting room and provides access to three 'interview' rooms and one 'program' room used for larger groups; the interview and program room each have desks with tops at a height of approximately 720mm.

3. Background

- 3.1 A building consent application was lodged with the authority on 7 April 2014. On 8 April 2014 the authority wrote to the applicant noting that it had carried out an initial technical check of the building consent application. The authority asked the applicant to confirm the classified use of the building, and, depending on the answer, whether the applicant also intended applying for a waiver or modification of Clause G5.3.4.

- 3.2 On 14 April 2014 the applicant responded to the authority, stating that each interview room will have a desk that would be accessible and accordingly the 'accessible counter' was provided via any of the interview rooms or the whanau/program room and therefore the proposed alterations would comply with Clause G5.3.4.
- 3.3 On 4 June 2014 the authority issued a building consent, No.993547/2014 for the alterations. Drawings dated 31 March 2014 and stamped as received by the authority on 4 June 2014 show the reception counter at 1200mm high. A building control officer noted 'lower portion not provided because of type of user / safety for workers...'
- 3.4 On 22 August 2014 the applicant wrote to the authority requesting an 'exemption for the provision of an accessible reception'. The applicant referred to an accessibility report provided with the building consent application which stated that 'the interview rooms are located in the immediate vicinity of the main entry' and 'the reception desk shall not have a lowered portion for reasons of security'.
- 3.5 The applicant went on to state their view that compliance with NZS 4121:2001⁴ was achieved by having direct access from the waiting room to the interview and program rooms, and that the provision of an accessible counter is 'not fit for purpose' because:
- Generally the reception is only used by visitors to announce their arrival and will not be used to conduct any business nor the filling out of any forms, these matters will be conducted in the privacy of the adjoining interview rooms
- General safety issues with the provision of a lowered counter allows offenders to easily climb the reception counter and also more easily reach over to attack staff and steal items on the staff desks
- Inconsistent with other existing CPS facilities such as that at Westport and elsewhere nationally which do not have accessible counters.
- 3.6 On 1 September 2014, the authority wrote to the Ministry requesting advice on the matter. The authority noted that it supported the applicant's view that an accessible counter was not appropriate but also stated that it *may* have issued the building consent in error without first considering the requirements of sections 67(3), 68 and 69.
- 3.7 On 1 September 2014, the authority also wrote to the applicant. The authority acknowledged that neither the building owner nor the authority had sought a determination under section 69(2), and noted also that the consent application did not indicate the owner was seeking a waiver or modification. The authority stated that it supported the applicant's view that an accessible reception counter was not appropriate for the reasons set out in the applicant's letter of 22 August 2014.
- 3.8 An officer of the Ministry responded to the authority on 10 September 2014, noting that the authority does not have the ability to grant a waiver or modification in relation to access and facilities for people with disabilities. The letter went on to state that it appeared the safety concerns could be addressed by way of a design solution, and a copy of the Ministry's relevant guidance document⁵ ("the guidance document") was provided.
- 3.9 In a letter dated 11 September 2014, the authority forwarded the Ministry's letter and the guidance document to the applicant and requested confirmation from the

⁴ New Zealand Standard NZS 4121:2001 Design for access and mobility: Buildings and associated facilities

⁵ Accessible reception and service counters (*Department of Building and Housing in association with the Barrier Free New Zealand Trust*) January 2007

applicant as to whether the owner had already applied for or been granted a waiver or modification for similar non-accessible reception counters. The authority noted the owner could apply for a determination on the matter or apply for an amendment to the consent.

3.10 The Ministry received an application for a determination on 1 October 2014.

4. The submissions

4.1 The applicant's submission

4.1.1 The applicant provided the following in support of the application:

- the covering letter to the application, dated 30 September 2014
- a copy of Schedule 2
- correspondence from the applicant to the authority, dated 22 August 2014
- email correspondence between the applicant and authority
- a copy of a 'building consent accessibility report' by an architect
- drawings of the reception counter.

4.1.2 In the covering letter to the application, the applicant described the service provided for in the facility as 'a series of scheduled interviews, one-on-one visits and pre-arranged programmes', noting that all visitors to the premises are known and most visits are timetabled.

4.1.3 In regards to the requirement for an accessible counter, the applicant submitted that:

- Staff knowledge of visitors means that any impairment would also be known.
- Staff are aware of timetabled appointments; should any offender with any impairment be registered to attend 'their arrival is prepared for in advance'.
- Visitors can be met in the waiting area or at the entrance and shown to one of the adjacent interview rooms.
- The counter is fully open to provide 'passive security' with office staff being able to see into the waiting area.
- The height and width of the counter provides an obstacle and hindrance to any 'would-be assailants'; a lowered counter presents a foothold or climbing opportunity to somebody with malicious intent.

4.1.4 The applicant also holds the view that the building type falls outside any of the types listed in Schedule 2; 'it is unique in that all visitors are known; there are none that turn up by chance, as in a police station for example. It is a non-custodial building, yet though it is a government office, it has a specific function and purpose maintaining a link between the state and the offender.'

4.1.5 In an email to the authority on 15 October 2014, the applicant also noted:

- Though the application for consent nominates 'community care' as the classified use, the determination application seeks to address this by 're-classifying it outside Schedule 2'

- The original reception counter was not accessible (photographs provided from both sides of the counter and a copy of the drawing for the original counter showing it 1200mm high with sliding laminated glass above).

4.2 The authority's submission

4.2.1 The authority made a submission in a letter dated 13 October 2014 in response to the application. The authority noted that it understood the application to be seeking a 'retrospective waiver' in respect of Clause G5.3.4. The authority submitted the following:

- The building is used for probationary services; there is no sleeping accommodation provided or detention facilities where persons would be restrained.
- The building has a classified use of "community care" facility (communal residential)' under Clause A1; as such Clause G5.3.4 applies.
- No code compliance certificate has been issued and the building is currently operating under a Certificate for Public Use.
- The drawings indicated a reception counter but it '[had] no information to confirm, or otherwise, whether it was 'accessible''.

4.2.2 The authority submitted that in its view:

- The building is one to which section 118 applies, noting also that the accessibility report stated the same.
- Neither the Act nor the Building Code differentiates between those members of the public who access or use a building by appointment or not.
- Regardless of a staff member who may have a disability, any probationer, support person, family member, or legal representative who may also be in attendance may be a person with a disability.
- The reasons for not providing an accessible public counter 'appear most reasonable' and it supports the applicant's view that an accessible counter is not appropriate.
- Other Department of Corrections buildings do not have accessible counters.

4.2.3 The authority also stated that 'in hindsight we don't believe we had the statutory authority to formally grant a waiver ... In effect we granted the building consent without acknowledging or addressing section 69(2)...' The authority acknowledged that it may have issued the building consent in error without first considering the requirements of sections 67(3) and 69(2) in regards to Clause G5.3.4.

4.2.4 The authority stated that it supports the application for a waiver of the requirements of Clause G5.3.4 in respect of the reception counter, specifically for the existing building for reasons of safety and security of the staff.

4.2.5 The authority provided copies of the following documentation:

- The application for building consent received on 7 April 2014. (I note here that G5/AS1 was marked as the means of compliance for Clause G5 and there was no indication that a waiver or modification was going to be sought.)
- Existing and proposed floor plans, stamped by the authority on 11 and 16 June 2014.

- Drawings of the reception counter, stamped by the authority on 4 June 2014 that show the height of the counter as marked in Figure 1.
- The building consent, dated 4 June 2014.
- Correspondence between the parties and with the Ministry (refer paragraph 3).

4.2.6 In an email to the applicant on 16 October 2014, the authority stated it considers the appropriate classified use to be ‘community care’ and holds that the building falls within Schedule 2 in respect of the requirements set out in section 118. The authority went on to refer to the drawings and photographs of the original counter and stated that ‘the question, therefore, is what is as near as reasonably practicable to comply with the provisions of the Building Code...’. The authority noted it had no information on ‘what dispensations were applied for or granted’ at the time the original counter was constructed and whether any waiver was granted.

4.3 Submissions in response to the first draft determination

4.3.1 A draft determination was issued to the parties and ODI for comment on 21 October 2014.

4.3.2 The authority responded by letter dated 28 October 2014, submitting the following:

- The authority holds the view that the classified use is ‘community care ... albeit on a non-residential basis’, however, it would accept the current use as stated on the consent application ‘could be considered commercial’. Regardless of this the limits on application mean Clause G5.3.4 still applies to any of the three types of buildings listed in the limitation.
- The drawings of the existing building clearly show an existing counter to one wall of the entrance foyer. The consented work shows ‘new internal wall construction and reception counter in a different location’. The authority ‘fail[s] to understand how [the construction of the counter] doesn’t come under the auspices of section 112’.
- The authority is unclear on the options available to it in terms of its regulatory role in the matter.

4.3.3 ODI responded by email on 3 November 2014, noting that

... in addition to the counter presenting a barrier to visiting offenders and their support people it would similarly impact on any staff who may, in the future, acquire or have an impairment limiting their mobility.

[ODI] encourage the [applicant] to consider alternative design solutions for reception counters which comply with accessibility requirements and security concerns, and not resort to seeking an exemption without exploring other reasonable options.

4.3.4 The applicant responded by email on 4 November 2014, submitting the following (in summary):

- The classified uses ‘office’, ‘community care’, and ‘commercial’ do not ‘[encapsulate] the use of the building either fully or adequately’.
- In reference to paragraph 5.1, in addition to the fact that those visiting the building are there by appointment only and known to the staff, there are CCTV cameras both in the entrance porches (or on the facades of) Community Corrections Services facilities, as well as a camera in the waiting area. Staff monitor those approaching the building ‘and a screen within the waiting area tacitly lets the visitor know they are on-camera’. If staff have concerns about

people approaching the building, staff can lock the front doors remotely before entry is attempted.

- The height of the counter at 1200mm is considered imperative for safety. The applicant referred to a recent shooting incident at a different Government facility.
- A delicate balance must be struck between attempts to make the experience of using such a facility open and welcoming yet not foreboding or confrontational. ‘Presenting a ‘*Fort-Knox*’ style interface to offenders serves only to antagonise’.
- The reception counter is a secure point for staff to greet offenders on arrival before showing them through to the adjacent interview room. Staff come from other rooms to greet the visitors at the counter; the counter is designed so that staff greeting visitors are standing. ‘Neither party is looking down on the other, and an opportunity to intimidate is stifled’.
- The reception counter is not one that offenders would linger at, nor would they be required to write or complete forms or transact any business at the counter. Therefore an accessible counter as described in Figures 36 and 37 of NZS 4121 is not considered necessary.

4.3.5 The applicant did not consider the reference to Determination 2004/65⁶ (refer paragraph 5.4.9) to be relevant because:

- the staff of the bank in Determination 2004/65 did not know who would be visiting or their circumstances; not all visitors would be taken into ‘the personal bankers room’
- all visitors to the corrections facility are taken into the interview rooms so there is no discrimination among visitors to the facility
- although the bank had security issues it does not have to take into account ‘the style or method of interface encountered in a Community Corrections Facility’.

5. Discussion

5.1 Application of section 118

5.1.1 The applicant has put forward the view that the building is not of a type to which section 118 applies (refer paragraph 4.1.4). I disagree with that view; the building falls under Schedule 2(g) as a building that houses a government facility.

5.2 Application of section 112

5.2.1 The building work undertaken under consent No.993547/2014 is an alteration to an existing building; the construction of the reception counter that forms part of the alteration is new building work and is not subject to section 112. Section 112 does not detract from the section 17 requirement that all building work must comply with the Building Code, to the extent required by the Act unless the building work is subject to a waiver or modification of the Building Code.

5.2.2 In its response to the draft determination the authority questioned why the reception counter is considered new building work when there was a counter in the facility

⁶ Determination 2004/65: Accessible counters in a commercial building (*Building Industry Authority*) 25 November 2004

prior to the alteration, and why section 112 does not apply to the construction of the new counter. (I note here that the original counter was in a different location to the new counter.)

5.2.3 Under section 112 (refer Appendix A.1), it is the building after the alteration, (i.e. the whole building that includes the existing building as well as the new building work), which must:

- comply as nearly as is reasonably practicable with respect to means of escape from fire, and
- comply as nearly as is reasonably practicable with respect to the provision of access and facilities for people with disabilities, and
- continue to comply to as at least the same extent as before the alteration for all other Building Code clauses.⁷

5.2.4 New building work (i.e. internal alterations and including the construction of a new reception counter in this case) must comply fully with the Building Code, as required by section 17 of the Act. Section 112 (1)(a) requires that the building as a whole must comply as nearly as reasonably practicable in respect of means of escape from fire and access and facilities for people with disabilities, and section 112(1)(b) ensures that the building work does not reduce the extent to which the altered building complies with the Building Code.

5.2.5 Therefore, with respect to the provision of access and facilities for people with disabilities:

- the new building work that is an alteration must comply fully with the requirements of the Building Code
- the building as a whole after the alteration, must comply with the Building Code to the extent required by section 112.

5.3 The requirement to comply with Clause G5.3.4

5.3.1 The applicant has referred to the fact that the staff would generally be aware of offenders scheduled to attend that may have a disability; however I note that this does not account for those with temporary disabilities or those that become disabled prior to their scheduled visit. In addition it appears that the facility would also be used at times by visitors other than the offenders, such as support people, legal advisers, and whanau, and it is not reasonable that the staff would necessarily be aware whether these visitors would have a disability.

5.3.2 In response to the draft determination the applicant submitted that the desk is designed so that staff remain standing to greet visitors, with the intention being that neither party is looking down on the other. I refer to the comment received from ODI (paragraph 4.3.3), with which I agree. The applicant's statement assumes not only that a visitor would be ambulant, but also that staff employed at the facility that would be greeting visitors will be ambulant.

5.3.3 The applicant has also submitted that the counter is not a typical 'reception counter' in terms of NZS 4121 and for the purposes of the Building Code and that it was not used for writing or any physical transaction.

⁷ Alterations to existing building and section 112 have been discussed in many previous determinations. Refer in particular to determination 2009/60 for further discussion about the application of section 112.

5.3.4 I am of the view that for the purposes of the Building Code ‘reception’ counters are not limited to just those where the counter is used for writing or other transactions of a physical nature. The counter is the point at which the staff and visitors make their initial contact and accordingly I consider that compliance with Clause G5.3.4 is required.

5.3.5 I hold the view that the classified use ‘community care’ that was on the consent application is incorrect as the building is not used for residential purposes. The building houses a Government office and the correct classification is ‘commercial’.

5.4 Compliance with G5.3.4

5.4.1 The question therefore is whether the reception counter as built complies to the extent required under the Act.

5.4.2 Clause G5.3.4 requires:

Where reception counters or desks are provided for public use, at least one counter or desk shall be accessible.

5.4.3 Clause A2 provides the interpretation of ‘accessible’ as ‘having features to permit use by people with disabilities’. A ‘person with a disability’ is defined in the Act as

... a person who has an impairment or a combination of impairments that limits the extent to which the person can engage in the activities, pursuits, and processes of everyday life, including, without limitation, any of the following:

- (a) a physical, sensory, neurological, or intellectual impairment:
- (b) a mental illness

5.4.4 I am of the view that the reception counter at 1200mm high as built does not comply with the requirements of the Building Code. The counter would be restrictive in terms of a disabled person’s ability to see or be seen, and to reach items if required. I note that the range of disabilities to be considered in terms of accessibility of reception counters are broader than just those who use wheelchairs; NZS 4121 provides various examples of disabilities such as extremes of physical size and reaching disabilities.

5.4.5 Regarding a reception counter 1200mm high and issues with security, the guidance document notes:

... a counter [1200mm] high can become a separation barrier for many other people and for wheelchair users. Often a high counter is used to provide security or privacy for staff, but it is always possible to provide a good design solution that meets everyone’s needs.

The guidance document goes on to say:

Research has shown that a 900mm high counter is practical for wheelchair users ...

5.4.6 In addition the commentary to paragraph 11.1.3 of NZS 4121 states ‘where security is a requirement, consideration should be given to the innovative use of step-down counters, security grilles or toughened glass’.

5.4.7 I acknowledge that the applicant perceives there to be conflict between the intention to create an environment that does not antagonise offenders and yet maximises safety for staff. I recognise this apparent conflict, and the challenges it has caused for the authority and the applicant; however I consider that a good design solution could maximise safety while still complying with the requirements of the Building Code to in respect of access for people with disabilities.

- 5.4.8 The applicant has stated that compliance with NZS 4121 has been achieved by having direct access from the waiting room to the interview and program rooms where there are accessible desks.
- 5.4.9 The guidance document refers to Determination 2004/65⁸ which considered accessible features that were intended to be provided in a separate room rather than at a public counter in a bank. Determination 2004/65 considered that there was a significant disparity between the service provided at the public counter and the separate room, and that those with disabilities would be required to attract the attention of staff to indicate they needed attention. The determination considered the alternative facility could not be said to provide a reasonable and adequate alternative to the public counter.
- 5.4.10 I accept the applicant's comment that the facility in this case, unlike the bank in Determination 2004/65, does not require transactions over the reception counter, and that the interview rooms will be used by every visitor attending the facility. However, the purpose of the reception counter is still to register visitor arrivals, which requires that a person is able to see and easily attract the attention of a member of staff, and equally be seen by them.

5.5 Waivers and modifications

- 5.5.1 Given the view that the conflicting issues of security and accessibility can be resolved by way of an appropriate design solution, I consider there to be no justification for a waiver or modification of the requirements of Clause G5.3.4.
- 5.5.2 I note that the authority and the applicant have both referred to other buildings under the same ownership and inferred that these do not have accessible public counters. I make no comment on these as they are not the subject of this determination; however I note that this determination should provide some guidance to the owner and other authorities and practitioners in the building industry.

6. What happens next?

- 6.1 The authority has requested guidance on its regulatory role subsequent to the issue of this determination.
- 6.2 Taking into account my finding that the reception counter does not comply with the Building Code, I am of the view that the building consent was issued incorrectly as the plans proposed a counter that did not comply with clause G5.3.4 and no modification or waiver was granted prior to the consent being issued.
- 6.3 Given that the building work has now been completed and the authority's decision relied upon, and as building work to bring the counter into compliance with the Building Code would be relatively minor, it would be impractical to reverse the authority's decision to issue the building consent.
- 6.4 In order to bring the building work into compliance with the Building Code and ultimately that a code compliance certificate may be issued, it is now for the applicant to apply for an amendment to the consent for a compliant reception counter.
- 6.5 As the code compliance certificate has not been issued, the authority is able to issue a notice to fix under section 164 if it considers a notice to fix is warranted.

⁸ Determination 2004/65: Accessible counters in a commercial building (*Building Industry Authority*) 25 November 2004

7. The decision

- 7.1 In accordance with section 188 of the Building Act 2004, I hereby determine that the reception counter does not comply with Clause G5.3.4 of the Building Code.

Signed for and on behalf of the Chief Executive of the Ministry of Business, Innovation and Employment on 3 December 2014.

John Gardiner
Manager Determinations and Assurance

Appendix A: The relevant legislation

A.1 The relevant sections of the Act

69 Waiver or modification may only be granted by chief executive in certain cases

- (1) This section applies to a waiver or modification of the [building code](#) that relates to—
- (a) an existing building to which [section 118](#) applies; and
 - (b) access and facilities for use by persons with disabilities.
- (2) If this section applies, the chief executive may grant a waiver or modification only in a determination issued under [subpart 1](#) of Part 3.
- (3) This section does not apply to a waiver or modification of the [building code](#) that relates to a new building or that is contained in a national multiple-use approval.

112 Alterations to existing buildings

- (1) A building consent authority must not grant a building consent for the alteration of an existing building, or part of an existing building, unless the building consent authority is satisfied that, after the alteration,—
- (a) the building will comply, as nearly as is reasonably practicable, with the provisions of the building code that relate to—
 - (ii) access and facilities for persons with disabilities (if this is a requirement in terms of section 118); and

118 Access and facilities for persons with disabilities to and within buildings

- (1) If provision is being made for the construction or alteration of any building to which members of the public are to be admitted, whether for free or on payment of a charge, reasonable and adequate provision by way of access, parking provisions, and sanitary facilities must be made for persons with disabilities who may be expected to—
- (a) visit or work in that building; and
 - (b) carry out normal activities and processes in that building.

- (2) This section applies, but is not limited, to buildings that are intended to be used for, or associated with, 1 or more of the purposes specified in Schedule 2.

Schedule 2

Buildings in respect of which requirement for provision of access and facilities for persons with disabilities applies

The buildings in respect of which the requirement for the provision of access and facilities for persons with disabilities apply are, without limitation, as follows:

- (g) central, regional, and local government offices and facilities:
- (h) courthouses:

(i) Police stations:

A.2 The relevant clause of the Building Code

Clause A1 – Interpretation

5.0 Commercial

5.0.1 Applies to a building or use in which any natural resources, goods, services or money are either developed, sold, exchanged or stored. Examples: an amusement park, auction room, bank, car-park, catering facility, coffee bar, computer centre, fire station, funeral parlour, hairdresser, library, office (commercial or government), Police station, post office, public laundry, radio station, restaurant, service station, shop, showroom, storage facility, television station or transport terminal.

Clause G5 – Interior environment

G5.3.4 Where reception counters or desks are provided for public use, at least one counter or desk shall be accessible.

Limitation on application

Performance G5.3.4 applies only to communal residential, communal non-residential, and commercial buildings.

Clause A2 – Interpretation

Accessible having features to permit use by people with disabilities

A.3 The relevant paragraph of G5/AS1

3.0 People with Disabilities

3.0.1 Acceptable activity space shall comply with NZS 4121.

A.4 The relevant paragraphs of NZS 4121:2001

11 Public facilities

11.1 Public counters and desks

11.1.1 General

Reception counters and desks for public use on an accessible route shall have at least one space of use by people in wheelchairs as visitors and staff working in the reception area (see figure 36). Such a space shall be at least 900mm wide.

C11.1.1

Requirements for reception counters and desks need to ensure that people with disabilities are able to carry out the normal processes and activities expected at that counter or desk

11.1.3 Screens

Wholly transparent screens on counter tops shall be provided with a clearly visible contrast strip.

C11.1.3

Where security is a requirement, consideration should be given to the innovative use of step-down counters, security grilles or toughened glass.