

# Warm to Touch

## UK Guidance Note for Customers

### 1. Purpose of This Document

This document provides guidance on the interpretation of “warm to touch” requirements within UK accessibility legislation and standards, and how these relate to door handles. It is intended for general guidance only and should be read alongside project-specific specifications, environmental conditions, and the advice of Building Control or an Access Consultant.

### 2. Relevant UK Legislation and Guidance

Accessibility requirements in the UK are primarily governed by:

The Equality Act 2010 (which replaced the Disability Discrimination Act – DDA)

Approved Document M of the Building Regulations (Access to and Use of Buildings)

BS 8300 (Design of an accessible and inclusive built environment)

These documents seek to ensure that building features, including door furniture, do not place disabled people at a substantial disadvantage when accessing or using a building.

### 3. “Warm to Touch” – Meaning and Intent

The term “warm to touch” (or “not cold to the touch”) appears in accessibility guidance as a performance-based principle, rather than a defined or testable requirement.

Key points of intent include:

The requirement does not mean that a component must be physically warm

It aims to avoid materials that may feel intensely cold in winter conditions

Cold metal surfaces can:

Cause discomfort or pain

Trigger conditions such as Raynaud’s disease

In extreme cases, cause skin to adhere to the surface

There is no defined temperature value, mandated material, or mandatory test method specified in legislation or guidance.

### 4. Scope of the “Not Cold to Touch” Requirement

Current guidance applies the principle primarily to components that:

- Are frequently grasped or leaned on
- Are located in external or exposed environments
- Are subject to cold weather conditions

In particular:

- Approved Document M now refers explicitly to handrails, stating that their surface should be “slip resistant and not cold to the touch”
- Door handles are not specifically referenced in the current wording of Approved Document M

This reinforces that the requirement is context-dependent, rather than a blanket prohibition on materials.

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### 5. Materials and Compliance Approaches

Accessibility guidance recognises several approaches to achieving compliance, including:

- Use of materials with low thermal conductivity, such as:
  - Timber
  - Plastics or polymers
  - Coated metals (e.g. polyester powder coating)
- Application of coatings or sleeves to metal components to reduce cold-touch perception

These approaches are most commonly adopted for external handrails and door furniture where cold exposure is foreseeable.

### 6. Exceptions and Practical Considerations

Approved Document M acknowledges that, in certain situations, alternative considerations apply. In particular:

- Where resistance to vandalism, durability, or low maintenance are key factors
- Where hygiene, longevity, or robustness are prioritised

In such cases, the guidance allows for the use of metals, including stainless steel, even where thermal conductivity is higher, provided the overall design does not create a substantial barrier to use.

### 7. Grade 316 Stainless Steel Door Handles

Our door handles are manufactured from Grade 316 stainless steel, offering:

- Excellent corrosion resistance
- High durability and resistance to vandalism
- Suitability for internal and external environments
- A smooth, hygienic, and easily maintained surface

From an accessibility perspective:

- Grade 316 stainless steel is classed as a bare metal
- Like all metals, it is thermally conductive and may feel cool in cold conditions
- In normal internal, heated environments, stainless steel door handles are:
  - Widely specified
  - Commonly used in accessible buildings across the UK
  - Accepted in hospitals, schools, transport buildings, and public facilities

### 8. Compliance Position

Based on current UK legislation and guidance:

- Stainless steel door handles are not inherently non-compliant with the Equality Act, Approved Document M, or BS 8300
- “Warm to touch” / “not cold to touch” is a design consideration, not a strict material prohibition
- Approved Document M’s current wording applies explicitly to handrails, not door handles
- Compliance is achieved where:
  - The handle can be comfortably grasped
  - The material does not create a foreseeable barrier to use
  - The overall design balances accessibility, durability, and environmental factors

In external or particularly exposed locations, designers may choose to specify:

- Coated or sleeved stainless steel
- Alternative materials with lower thermal conductivity

These remain design decisions, not absolute legal requirements.

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### 9. Summary

- “Warm to touch” is guidance-based and performance-led
- There is no defined temperature, test, or blanket ban on metal
- Approved Document M no longer references door handles directly
- Stainless steel is acceptable, particularly where durability, hygiene, or vandal resistance are key considerations
- Final suitability depends on location, exposure, and project-specific requirements

### 10. Further Advice

For project-specific confirmation, consultation is recommended with:

- The project Access Consultant
- Building Control
- The project architect or specifier

We are also happy to provide material samples or discuss alternative finishes where required.

### Relative Thermal Conductivity of Handle Materials

Values are approximate and given at room temperature. Surface finishes (satin, anodised, painted) slightly affect feel but do not dramatically change the bulk conductivity.

Material	Typical Thermal Conductivity (W/m·K)	Relative Conductivity	How It Feels as a Handle
Satin anodised aluminium	~160–180	Very High	Feels <i>very cold</i> to touch; rapidly draws heat from the hand
Satin stainless steel (Grade 316)	~14–16	Medium	Cool to touch, but noticeably warmer than aluminium
Painted metal (steel or aluminium substrate)	~15–50*	Medium–High	Slightly less cold than bare metal; still conducts heat away
Wood (hardwood, typical)	~0.12–0.20	Very Low	Feels warm and comfortable; excellent thermal insulator

\* Paint itself is insulating (~0.2 W/m·K), but the layer is very thin, so the underlying metal dominates thermal behaviour.