

Deafness Council Western Australia Incorporated

Submission No 27

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BY:.....LACA.....

Submission to the House Standing Committee on Legal and Constitutional
Affairs

Inquiry into the draft Disability (Access to Premises – Buildings)
Standards

February 2009

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Introduction

The Deafness Council Western Australia Incorporated welcomes the opportunity to provide a submission to the House Standing Committee on Legal and Constitutional Affairs in relation to the Inquiry into draft Disability (Access to Premises – Buildings) Standards.

The Deafness Council was incorporated in Western Australia in 1984 and had previously been active as an unincorporated organisation since the 1970s.

The Deafness Council is an endorsed charity and is a non-profit organisation. A major objective of the Deafness Council is advocacy for people who are deaf or have a hearing impairment.

Emergency Egress from Buildings

The draft standard does not address emergency egress from buildings for people with disabilities.

The Deafness Council understanding is that emergency egress issues were reserved while research was being undertaken. The idea was that when suitable technical solutions were found to improving emergency egress they would be added to future revised standards.

The Deafness Council understanding is that there are significant emergency egress issues for people with mobility disabilities in multistory buildings. The Deafness Council expertise relates to people with a hearing impairment. Although we strongly support full access by all people with disabilities, since we do not have expertise in other disabilities our comments on emergency egress are restricted to people with a hearing impairment.

The key issue for emergency egress from buildings for people with a sensory disability is that information should be available through more than one sense. Audible information needs to also be visible (and vice versa for people with a vision impairment). This is a general design and service provision principle reflected for example in captioning of the audio content of television and DVDs for hearing impaired people and audible information at traffic lights to assist blind people to cross the road.

Emergency egress alarms need to both audible and visible.

Emergency alarms and smoke alarms are already readily available that provide both audible and visible signals.

Unless alarms are both visible and audible, there is a risk that people with a hearing impairment may be unaware that there is an emergency that requires their attention and action.

This is quite different to the emergency response for people with mobility disabilities, which require a mechanism for egress from the building as distinct from a mechanism to make them aware of the need for egress.

One term of reference for the inquiry is whether the Premises Standard will have an unjustifiable impact on any particular sector or group within a sector.

The Deafness Council submits that the failure to include visual emergency alarms in the standard has an unjustifiable impact on people with a hearing impairment.

The technology is available and the need is manifest.

Members of the Deafness Council have reported situations where their safety was compromised by entering a public building when an alarm was sounding and the building had been evacuated. Not all entries to buildings seem to be manned during an emergency with reliance often placed on the audible warning to ensure that visitors do not enter. A visual warning in conjunction with the audible warning should be required in the premises standard.

The Deafness Council is also aware of concern by people who have a hearing impairment that their safety and dignity is at risk in buildings that do not have visible alarm signals. Although safety procedures in public buildings often require that wardens are appointed who check buildings, there is a risk that deaf people may be overlooked due to the speed that may be necessary to evacuate the building, particularly if not in a readily visible place. Also both deaf people and the warden are at risk to their dignity and privacy if the warden enters a locked toilet or shower cubicle.

The Deafness Council has noted that some buildings in Perth to which the public has access have installed or are in the process of installing visible alarms, including alarms in toilets. In at least one case this has been in response to an trial evacuation at a time when a deaf person was visiting the building.

In summary, the Deafness Council submits that there is a real risk to the safety and dignity of people with a hearing impairment if the Premises Standards do not require visible egress alarms. The technology for visible alarms is well developed, and readily available. The technology has a low cost in comparison to its benefits if fitted as part of construction or renovation of a building.

Recommendation

The draft standard be modified to require visual alarms to assist emergency egress by people who have a hearing impairment.

Hearing Augmentation

The Deafness Council notes the provisions in the draft standard relating to hearing augmentation. Hearing augmentation is addressed in the submission from Deafness Forum of Australia. This submission is endorsed by the Deafness Council.

Authorisation of submission

Preparation of the submission was approved at a General Meeting of the Deafness Council on 18 February 2009, and the submission was authorized by members out of session.

Officers of the Deafness Council who may be contacted in relation to this submission are Barry Mackinnon, President on [redacted] and John Byrne, member on [redacted] (work).

John Byrne
Deafness Council Western Australia Incorporated
27 February 2008