

SUBMISSION TO THE INQUIRY ON THE DRAFT DISABILITY (ACCESS TO PREMISES – BUILDINGS) STANDARD

March 2009

About the Royal Society for the Blind SA, Inc

The Royal Society for the Blind of SA, Inc (RSB) ...

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The RSB has substantial expertise in the area of access having had a focus on accessibility issues for many years had a dedicated project "Future Solutions" for the last 10 years. This project focuses on ensuring that facilities equipment and services are accessible for people who are blind or vision impaired. The RSB employs expert staff in this area including a team of Orientation and Mobility Instructors and staff who are accredited in access auditing. The RSB is a member of the Australian Council of Access Auditors.

Introduction

The RSB was part of the Australian Blindness Forum's (ABF) Working Party which prepared the ABF's submission to the Inquiry. The RSB supports the detailed submission and all recommendations in that submission. These recommendations are attached in Appendix A.

Areas of Concern

The RSB cannot support the Draft Disability (Access to Premises – Buildings) Standard (The Standard) in its current form as it does not meet the needs of people who are blind or vision impaired. The reasons for this are as follows:

- 1 The Standard has not been considered in the context of the UN Convention on the Rights of Persons with Disabilities which the Australian Government signed in 2008. The development of the Standard occurred with the Disability Discrimination Act 1992 (DDA) providing the framework. Accordingly, the Standard needs to acknowledge the authority of the UN Convention in achieving accessible premises and the House of Representatives Legal and Constitutional Affairs Committee (The Committee) needs to ensure that the Standard is aligned with the UN Convention.
- 2 The RSB believes that the Standard in its current form does not contain any improvements over the current Building Code of Australia and, as such, provides minimal coverage of the needs of people who are blind or vision impaired.

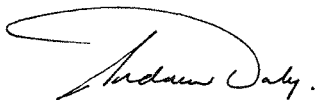
This is particularly notable in the omission of Wayfinding. The essential elements of Wayfinding are the provision of a logical path of travel and

accessible signage. The coverage of these issues in the Standard is, at best, minimal and as a result effectively endorses environments which significantly inhibit the independent travel of people who are blind or vision impaired.

- 3 The Standard has based its coverage of the needs the blindness sector on the Australian Standards AS1428:1-4. However, Part 1 and 4 are currently in draft format and no consultation with our sector has yet been held. If changes in AS1428 occur, the two standards could be in conflict. These issues need to be resolved first.
- 4 The RSB believes that the Committee needs to clarify the status of this Standard in relationship to the DDA complaints process. As the Standard is silent on Wayfinding, it is not clear whether complaints based on the lack of Wayfinding will be possible. For example, could a complaint be lodged about the lack of accessible signage at the entrance of a building?

Conclusion

It is essential that the Standard satisfactorily address the needs of people who are blind or vision impaired as it is a critical mechanism for increasing the understanding and knowledge of architects, builders, engineers as well as the wider community.



ANDREW DALY
Executive Director

Appendix A

SUMMARY OF RECOMMENDATIONS BY THE AUSTRALIAN BLINDNESS FORUM:

It is the ABF's expectation that each of these recommendations will be incorporated in the final Premises Standard.

The ABF Recommends:

Recommendation 1: That in assessing any provisions in the Premises Standards the Committee must comply with the provisions of the Convention.

Recommendation 2: That where unjustifiable hardship is used to justify the exclusion of people with disabilities that the provision of no access is not appropriate and the Premises Standard needs to reflect this.

Recommendation 3: That the term 'safe, equitable and dignified access' be included in the final version of the Premises Standard.

Recommendation 4: That consideration of the Premises Standard and AS1428.4.1 be aligned.

Recommendation 5: That both Standards Australia and the Commonwealth Government ensure that all materials are accessible to people who are unable to read print in their format of choice.

Recommendation 6: That wayfinding be included in the Premises Standard however in the interim:

1. The current version of the Premises Standard be rewritten in a manner that allows wayfinding issues to be easily inserted before the scheduled five-yearly review.
2. The jurisdiction under which complaints about wayfinding issues can be lodged is clarified.

Recommendation 7: The inclusion of emergency egress accessible design to which ensure the safe evacuation of people who are blind or have low vision.

Recommendation 8: That lighting of public space be included in the Premises Standard.

Recommendation 9: That, at the reviews of, the various parts of the Premises Standards they are harmonised without loss of access or amenity for people with disability.

Recommendation 10: That, as a matter of priority, disability access standards covering all types of premises must be developed and either added

to the Premises Standard or allowed to stand alone as per the Disability Standards for Accessible Public Transport.

Recommendation 11: That a requirement for a clearly identified logical and safe access way for pedestrians to enter a shopping or other similar centre be mandatory under the Premises Standard.

Recommendation 12: That, for Class 2 or 3 Buildings the common areas are accessible, this includes the foyer, lifts, laundry and other areas as listed in Table D3.1. The Premises Standard should include the mandatory provision of TGSI's and contrast nosings on stairs, marking on glazing and accessible signage for all facilities in common areas.

Recommendation 13: That the exemption in D3.4 be deleted as it currently effectively precludes people who are blind or have low vision from safely using stairs in a significant number of premises and hence effectively denying access.

Recommendation 14: The ABF recommends that accessible signage be available to people who are blind or have low vision, for all signs listed within clauses D3.6 (b) – (f) and in addition to include:

- Directional signs for sanitary facilities being displayed in common areas in a building
- Signage used to identify hotel and other rooms, airport gate number, numbers on stair landings and near lifts (for floor identification)

Recommendation 15: That specifications be developed and included for commercial driveways and directional TGSI's.

Recommendation 16: That the exemption of accessibility features for fire isolated stairs be removed.

Recommendation 17: That tactile indicators for overhead obstructions should only be used where all other methods of providing an alternative or 'natural' tactile cue have been deemed unsuitable.

Recommendation 18: That the exclusion of health-care buildings be removed.

Recommendation 19: That all frameless glazed surfaces be marked in accordance with AS1428.1 where there is no chair, rail, handrail or transom.

Recommendation 20: That specification D3.6 be replaced and other specifications reflecting those of Part H be included.

Recommendation 21: That clause D4.2 (c) (ii) deciding tactile and audio signage includes the 50mm to 300mm requirement from the latch side of the door.

Recommendation 22: That the Standard clarifies precisely which “case” is meant.

Recommendation 23: That the Committee liaise with the ABF and Australian Braille Authority to ensure that a suitable document is available for reference by Standards Australia.

Recommendation 24: That the placing of Braille with descenders be clarified.

Recommendation 25: That Accessible Toilet locking mechanisms have controls useable by people who are blind or have low vision and this be included as a requirement of the Access to Premises Standard within section F2.4.

Recommendation 26: That the final version of the Premises Standard clearly reflects the growing demand that buildings are accessible by the greatest number of Australians possible, including those who are blind or have low vision.