

Submission No 9

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Older Women's Network

Submission to House of Representatives Standing Committee... Draft Disability (Access to Premises – Buildings) Standards.

The Older women's Network NSW is a not-for-profit organisation with national representation. The objectives of the organisation include research and advocacy on issues affecting the lives of older women. Our membership is approximately three thousand nationally with many other women participating in programs organised by OWN at state level. Our membership is representative of a wide age range from the mid forties.

We appreciate the opportunity to comment on this Inquiry into the draft Disability (Access to Premises-Building) Standards and the objective of 'mainstreaming' the Disability Discrimination Act (1992). And we applaud the initiative of the Government in becoming a signatory to the UN Convention on the Rights and Dignity of Persons with Disabilities.

We are, however, concerned that the documents available for consideration in the context of this Inquiry such as the Disability (Access to Premises- Buildings) Standard Guidelines (2009) and the Regulation Impact Statement (2008) do not reflect in anyway the current and probable impact of Australia's rapidly ageing population. Cohorts aged 65 years and over currently represent fourteen percent of the total population and will be twenty five percent over the next few decades (Treasury, 2007a). Significantly, over time, the majority of the ageing population will be women; thus the particular interest by the Older Women's Network in this Inquiry.

Reference to the ageing population in this context is not intended to imply that all 'older people' are disabled for, indeed, the opposite is the case. Rather, it is our intention to 'raise the bar' in terms of justifying change especially when the statistics quoted in the Regulation Impact Statement are marginal focusing as they do on, for example, the users of mobility aids such as wheelchairs, walking sticks and so on.

Despite the great diversity among older women there is real determination among them to remain independent throughout their lives and to maintain their dignity and social inclusion in their community. This determination is to be encouraged as it is well known that social inclusion contributes to the general health, well being and safety of individuals especially those in later life. Unfortunately, ageing and accidents often impose physical limitations which even though of a fairly minor nature quickly contribute to social exclusion and negative affects on the health and well being of those people. Attention to access to and within buildings can contribute greatly to falls prevention and other measures adopted by older people themselves to maintain their health and well being.

The Older women's Network appreciates the concern, demonstrated in the Regulation Impact Statement (2008), to minimise costs to all levels of government and the private sector in the implementation of change in this context. The challenge, however, is not to minimise the need but to

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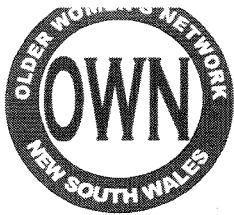
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be as inclusive as possible in order to deliver sound outcomes for a significant and burgeoning section of the population.

Improving access to potential employment opportunities for those who use mobility aids is of importance for individuals and the economy. But, so is the opportunity to participate, as volunteers, in the work of, for example, community service organizations which is also of value to individuals and the economy. Research indicates that the monetary value of the work of volunteers to the Australian economy is \$AUS42 billion each year (Dept. Family and Children Services, 2003). Much of this work is performed by older cohort groups.

Our submission represents issues raised by many of our members concerning the physical aspects of disability with respect to diminished sight, hearing and mobility. We have attempted to address the Terms of Reference of the Inquiry, in particular the appropriateness and effectiveness of the proposed Premises Standards in achieving their objectives.

Comments on the proposed Premises Standards

Our comments go to the scope of the proposed changes as our interest is in broadening the base of access across the spectrum.

We submit that the approach taken in the Draft Premises Standards to achieving objective 1.3 (a) places the onus for change on building developers, managers and certifiers. We are concerned that this provides considerable scope for the status quo to remain with respect to existing buildings. In other words the majority of existing 'public' buildings, such as those which include offices, shops, and where goods and services are sold such as restaurants, health services etc, would remain inaccessible. These are the Class 5, 6, 7, and 8 buildings.

The Older Women's Network favours a more proactive approach to ensure that access to existing 'public' buildings is improved. This could be achieved with State and Local Governments implementing realistic compliance time frames for all existing 'public' buildings to meet the access standards as proposed. In other words the 'trigger for change' would in large measure rest with government rather than on the whims of the owners and managers of buildings in both the private and public sectors.

We understand that the proposed Premises Standards are not intended to apply to private dwellings. We stress the need for new private dwellings to be included in the Premises Standards given the expected increases in the ageing population for whom the need for suitable housing will be of considerable significance.

We note that the proposed Premises Standards address existing public transport buildings 2.1 (5) and refers to 'passenger use area/s'. We are concerned that the intent in this regard should include access to **all** railway stations, platforms and trains and to bus transfer stations and Airports. The Disability

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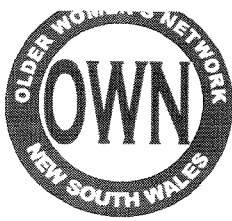
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Standards for Accessible Public Transport Amendments 2009 indicates a compliance of 25% would be adequate with respect to, for example, lifts, ramps etc. It is well recognised that attention to this issue by State Governments is sadly lacking, for example, NSW.

Heritage buildings have traditionally been given special consideration in the form of waiving Standards with respect to access. This applies even when there is often the opportunity to improve access to a building and or levels within the building with heritage used as an excuse for inaction. Specialists should be engaged to provide advice independent of owners and local government authorities on how to improve disability access to heritage buildings.

Access for sight impaired individuals would be improved by the more general use of audio information in foyers and lifts and more appropriate signage with information on services available within buildings. The generalised use of Braille is to be encouraged.

We note that for the first time access requirements for entry into public swimming pools for people with disability is included. We are concerned, however, with the proposal that this requirement only applies to swimming pools with a perimeter greater than 40m. In this situation the 2004 draft proposal is favoured by the Older Women's Network which stipulated that 'all swimming pools associated with a building required to be accessible regardless of the size of the pool' (Regulation Impact Statement 2008p 23). In this context we note that a swimming pool very popular among older residents, in an Inner Western suburb of Sydney, provides access into the pool with the use of a hydraulic chair lift as required. This pool is 33m.

Summary

Combining the Building Code of Australia and the Disability Discrimination Act (1992) is an important initiative of the Federal Government and one that the Older Women's Network fully appreciates. We are concerned, however, that the perception of need is narrowly focused and limits the desired outcomes that might be achieved through more a progressive interpretation of one of the key objects.

Even if our concerns are in part implemented in the Draft Premises Standards we recommend that a form of regular reporting be required from Local and State levels of Government so that there is evidence on the extent of change in improving access to buildings and reducing discrimination in this regard.

Written by Dr. Sonia Laverty (Ph.02 9519 3137) at the request of and endorsed by OWN NSW Management Team, 12 February 2009.

References

Treasury (2007a) *Intergenerational Report 2007*, Commonwealth Treasury of Australia, Canberra
Dept. Family & Community Services (2003) *Australian volunteer More than 700 hours each year*, Worldvolunteerweb.org

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