

Submission No 01

VISION  
**2020**  
THE RIGHT TO SIGHT  
AUSTRALIA

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# Draft Disability (Access to Premises - Buildings) Standards Guidelines

Consultation response

March 2009

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## Purpose

To respond to the House Standing Committee on Legal and Constitutional Affairs' call for input into the draft Disability (Access to Premises - Buildings) Standards 2009.

## Vision 2020 Australia

Established in October 2000, Vision 2020 Australia is part of 'VISION 2020: The Right to Sight', a global initiative of the World Health Organisation and the International Agency for the Prevention of Blindness.

As the peak body for the eye health and vision care sector, Vision 2020 Australia represents over 50 member organisations involved in; local and global eye care, health promotion, low vision support, vision rehabilitation, eye research, professional assistance and community support.

Collectively, Vision 2020 Australia and members seek to eliminate avoidable blindness and vision loss by the year 2020 and ensure blindness and vision impairment are no longer barriers to full participation in the community.

Vision 2020 Australia played a pivotal role in the development of the National Framework for Action to Promote Eye Health and Prevent Avoidable Blindness and Vision Loss and is advocating for a low vision and rehabilitation strategy.

## Background

Vision 2020 Australia welcomes the draft Disability (Access to Premises - Buildings) Standards Guidelines 2009 and is encouraged to see that the Building Code of Australia and the Premises Guidelines have been made consistent to meet the requirements of the *Disability Discrimination Act*.

Vision 2020 Australia also congratulates the Australian Government on being one of the first countries to ratify the United Nations Convention on the Rights of Persons with Disabilities and draws the Commissions attention to Article 9 of the Convention which states -

The right to access one's physical environment is protected under Article 9 (Accessibility) of the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), which applies to:

- a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;*
- b) Information, communications and other services, including electronic services and emergency services.*

The UN CRPD specifically requires countries to:

- a) To develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public;*
- b) To ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities;*

*d) To provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms."*

In 2004, there were an estimated 480,000 Australians who are vision impaired, including over 50,000 people who are blind. It is estimated that by the year 2024 that nearly 800,000 people will be vision impaired or blind<sup>1</sup>.

Improving access for Australians with vision loss or blindness is a critical component to promoting independence, social inclusion and full participation in community life.

To maximise outcomes for people with vision loss or blindness Vision 2020 Australia recommends that a range of further measures are incorporated into the Guidelines.

## Proposed Guideline Enhancements

Vision 2020 Australia urges the House Standing Committee on Legal and Constitutional Affairs' to include way finding in the five year review of the guidelines and include a range of enhancements in the Disability (Access to Premises - Standards) Guidelines 2009 for Australians with low vision or blindness.

### Way finding

Way finding is not addressed in the draft Guidelines. Way finding enables a person with vision loss or blindness to successfully navigate their way through a space independently and safely, providing an integrated system of information through the use of a wide range of tools. Provision must be made for way finding to be included in the five year review of the Guidelines.

### Lift access

Lift access needs to be enhanced to include the use of raised Braille, tactile signage and audible messaging. These mechanisms enable a person with vision impairment or blindness to access buildings with lifts safely and reach their desired destination independently.

### Access ways

Ensure people with vision impairment or blindness can safely navigate doors, pathways and other access ways within the building envelope. In particular, glass doors or highly glazed walls or other surfaces need be treated with a continuous band of high colour contrast strip to minimize the possibility of a vision impaired person colliding with a door or wall which they have been unable to see.

### Class 2 buildings

Class 2 buildings (apartments and flats) are excluded from the Guidelines. This class of building was previously included in the 2004 draft of the Guidelines. People with vision impairment or blindness, along with people with other disabilities, should be able to access this class of building. Class 2 buildings should be reinstated in the Guidelines.

### Emergency exits

It is imperative that people with vision impairment or blindness are able to successfully move to safety in the event of an emergency in a building. Importantly, people must be able to

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<sup>1</sup> *Clear Insight, The Economic Impact and Cost of Vision Loss in Australia, an Overview, 2004 Eye Research Australia and Access Economics*

locate emergency exits, make their way to the external exit and proceed to a safe zone. It is unclear how the Guidelines address the full evacuation of people who are vision impaired or blind from building. This needs to be addressed and updated.

#### **Public areas**

Where public areas exist within the building envelope eg toilets, open space, foyers, etc people with vision impairment or blindness must be able to use these facilities and safely navigate to, from and through these areas. Further consideration needs to be given to public areas within a building for people with vision loss or blindness.

#### **Signage**

Where visual signage exists in a building, signage for people with vision impairment or blindness must also be included. Further, consideration needs to be given to how people will find this signage within a building. Non visual cues are important for a person with vision loss or blindness to safely navigate their way through a building to their desired destination and must be included in the Guidelines.

### **Recommendations**

It is recommended that the House Standing Committee on Legal and Constitutional Affairs'

- include way finding in the five year review of the Guidelines and consult stakeholders from the eye health and vision care sector; and
- include a range of enhancements, outlined above, in the Disability (Access to Premises - Standards) Guidelines 2009.

## Contact details

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