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Vision Australia
Submission to
House of Representatives
Legal and Constitutional Affairs Committee

Inquiry into
Draft Disability
(Access to Premises – Buildings) Standards

March 2009

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Introduction

1.1 About Vision Australia

Vision Australia is Australia's largest provider of services to people who are blind or have low vision. It has been formed over the past several years through the merger of several of Australia's oldest, most respected and experienced blindness and low vision agencies. Our vision is that people who are blind or have low vision will increasingly have the choice to participate fully in every facet of life in the community.

To help realise this goal, we are committed to providing high-quality services to the community of people who are blind or have low vision, and their families, in areas that include early childhood, orientation and mobility, employment, information, recreation and independent living. We also work collaboratively with Government, business and the community to eliminate the barriers people who are blind or have low vision face in accessing the community or in exercising their rights as Australian citizens.

The knowledge and experience that Vision Australia gains through its interaction with clients and their families, and also by the involvement of people who are blind or have low vision at all levels of the Organisation, means that it is well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

Vision Australia believes that it is important for us, as an organisation in the blindness sector, to make comment on the current Draft Disability (Access to Premises – Buildings) Standards. Our clients will be affected in many ways by the passage of such Standards. While most of these effects will be very positive, there are several areas in which we believe the current Draft falls short of what is needed to ensure safe, dignified and equitable access that is consistent with the Objects of the DDA and also with the rights conferred by the UN Convention on the Rights of Persons with Disabilities, and we therefore seek to draw the Committee's attention to these.

1.2 Scope and Structure of this Submission

In the main, this submission addresses issues that we believe are of direct relevance to people who are blind or have low vision. However, we have had frequent and valuable discussions with our colleagues in other areas of disability, and representatives from Vision Australia have participated in a number of the discussions organised by the Australian Federation of Disability Organisations (AFDO), and People with Disabilities Australia (PWDA).

The remainder of this submission is structured as follows:

- Section 2 presents some general comments about the Draft Standards;
- Section 3 provides a discussion of several aspects of the Draft Standards that in our view must be amended so as to provide adequate safety for people who are blind or have low vision;
- Section 4 comments on various specific provisions of the Standards, including the Access Code (Schedule 1 to the Standards);
- Section 5 discusses a number of issues that require further work as part of the first 5-year review of the Standards.

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General Comments

2.1 Need for Premises Standards

Vision Australia recognises the need for Premises Standards, and strongly supports the passage of the Standards as soon as possible. The current Draft is the culmination of 9 years of work by the Building Access Policy Committee, and represents a significant achievement in negotiation and the development of consensus. We are aware that many of the issues requiring discussion are complex, and that while there have been creditable efforts to achieve a broad consensus between the disability sector and industry, there have also been a number of compromises and concessions, some of which do not point in the direction of enhanced access. At the same time, the lengthy discussions have

meant that we have been without Premises Standards, and, as a result, many buildings have been constructed without sufficient access.

It is also worth noting that the number of people who are blind or have low vision is increasing. Vision loss is primarily a function of ageing, because of such causal factors as diabetes and macular degeneration, and since the Australian population is ageing, then it is inevitable that there will be an increase in the number of people who are blind or have low vision. Some statistics suggest that the current figure is likely to double over the next two decades.

The number of people who will benefit from Premises Standards is thus likely to increase substantially over time and, conversely, the failure to deliver Premises Standards that mandate appropriate levels of access will have a cumulative negative impact on the opportunities for people with disability to participate fully in society.

2.2 Premises Standards Must Implement the Principles of the UN Convention

The UN Convention on the Rights of Persons with Disabilities (“the Convention”) was finalised in December 2006 and ratified by Australia in 2008. It is a landmark UN Treaty and its focus on the fundamental human rights of people with disability is providing unprecedented stimulus to the development of rights-based policies to promote the full inclusion of people with disability in society.

The Convention specifically asserts the right of people with disability to have equal access to premises that are open to the public. Article 9 states (in part):

- “1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:
 - 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.
2. States Parties shall also take appropriate measures to:

- a. 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. 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;
- c. Provide training for stakeholders on accessibility issues facing persons with disabilities;
- d. Provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms;

...”

Because Australia has ratified the Convention, it has obligations to implement strategies and policies for promoting and protecting the rights that the Convention confers, including the rights listed above in relation to premises and buildings. Vision Australia believes that in assessing any provisions (including exemptions) in the Premises Standards, the Committee must have serious regard to whether those provisions are consistent with the Convention. We would suggest that the Convention should be given greater weight than any cost-benefit analysis when the impact of specific provisions is being considered.

The Convention reinforces the objects of beneficial legislation such as the *Disability Discrimination Act 1992*, and the promotion of those objects is a further reason not to over-estimate the role of cost-benefit analysis in deciding on the merits of particular provisions.

2.3 Access should be Provided to the Maximum Extent Possible

The Guidelines that accompany the Draft Standards include advice that providing some access is better than providing no access at all (S5.1(8)). While this advice is provided in the context of a discussion of unjustifiable hardship, Vision Australia believes that it should apply more generally to the Standards, especially in the case of exemptions. While it may not be possible to provide full access in some cases, it is often possible to provide accessible signage, tactile ground surface indicators (TGSIs), and other access features. For example:

- Currently, Class 2 buildings are exempt from the Standards. There would seem, however, no reason why Braille and tactile signage and TGSIs should not be used in such buildings because they do not add substantially to the cost and they lead to a significant increase in access and safety for people who are blind or have low vision. At the very least, these access and safety features should be installed in all public areas within Class 2 buildings, such as laundries, swimming pools, and common rooms.
- There are limitations on the access required in Class 3 buildings such that the use of TGSIs and luminance contrast features (including contrast strips on stair nosings), is either not required at all, or else only required in certain areas of the building. This will result in inconsistency and uncertainty.
- There is an exemption for the use of TGSIs in Class 9a Buildings if compliant handrails are provided (Clause D3.8 (3)). Our strong view is that a handrail is not a substitute for TGSIs, firstly because it is not always possible to locate or use a handrail (if one has a white cane or dog guide lead in one hand, and a bag in the other, for example), and, secondly, because it is unlikely that the majority of people who are blind or have low vision will know that Class 9a buildings are treated differently from other buildings. While we are not opposed to the use of compliant handrails, we are opposed to their use as an alternative to TGSIs in Class 9a buildings. Moreover, we are not aware of any reasons why TGSIs should not be used in public areas in Class 9a buildings as they would be used elsewhere.
- There is an exemption for Class 9b buildings such that access is not required for platforms, raised seating and other areas where there is no wheelchair seating (Table D3.1). There is no reason why TGSIs should not be provided in such situations—in fact, without them, such areas will be more hazardous for people who are blind or have low vision.

2.4 Need for Referenced Standards to be Available in Accessible Formats

The Draft Standards reference a number of Australian Standards. These referenced standards are not currently available in formats that people who are blind or have low vision can access, and so it is very difficult for people who are blind or have low vision to become familiar with the specific provisions so that they can provide informed comment or assess whether a particular building may be in breach of a requirement.

Vision Australia believes that it is a fundamental principle of access and equity that standards which have an impact on people who are blind or have low vision should be accessible to them. We do recognise the need for the Premises Standards to refer to Australian Standards, but we would urge the Committee to liaise with Standards Australia to ensure that, in future, those Australian Standards that are relevant to people who are blind or have low

vision are made available in accessible formats such as braille and Word/RTF formats.

We are also concerned that some of the Standards referenced in the Premises Standards are themselves only in draft form. This is particularly the case with AS1428.1, which has only been released to the public in the past few weeks. Because this Standard is only a draft, there may be further changes to it before it becomes final. The Premises Standards will reference the finalised version of AS1428.1, but that version does not exist yet, so it is impossible to know what may change and, hence, what the impact of those changes will be on the Premises Standards.

Vision Australia's view is that it is a rather unsatisfactory state of affairs when comments must be made on the basis of information that may change in ways that cannot be foreseen at the time comments are made. We therefore strongly urge the Committee to seek the finalisation of AS1428.1 and any other referenced draft standards as soon as possible, and to ensure that there is an opportunity for comment on the Draft Premises Standards once all referenced standards have been finalised.

3

General Issues

3.1 Provision of Tactile Ground Surface Indicators, and Luminance Contrast features (including Contrast Strips on stair nosings)

We are very concerned that the current Draft Standards contain a significant number of exemptions to the requirements that tactile ground surface indicators (TGSIs) and adequate luminance contrast (including contrast strips on stair nosings) should be provided as warnings of stairs, ramps, and other potential hazards. The information conveyed by such features is vital for the safety of people who are blind or have low vision, and is not simply a matter of access. To this extent, failure to provide TGSIs and sufficient luminance contrast (including contrast strips on stair nosings) compromises the safety of people who are blind or have low vision. As such, Vision Australia believes that there should be no exemptions from the requirement to provide them. In particular:

- There should not be an exemption for Class 2 buildings;
- There should not be a limitation on the provision of TGSIs in Class 3 buildings. As was noted above, the current limitation will result in the inconsistent application of TGSIs and luminance contrast features (including contrast strips on stair nosings), and this will create confusion and uncertainty for people who are blind or have low vision. What it will mean, in effect, is that people will be safe in one part of a building, but not

in another. This is just not acceptable in Standards that are designed to promote equal, independent, and dignified access.

- There should not be an exemption for fire-isolated stairs (we are astonished that this exemption is in the current Draft—these stairs are used in situations where people are hurrying and under pressure, and where it is therefore even more important that safety considerations are addressed);
- There should not be an exemption for swimming pool ramps, because in such situations it is often difficult to tell when the ramp is about to reach the water if TGSIs are not provided;
- There should not be an exemption for kerb ramps within buildings and their approaches, since they typically lead to areas where there may be vehicular traffic, and so people who are blind or have low vision require adequate warning of the approaching kerb. It is worth noting in this context that the gradual introduction of "quiet cars" (using electric power or a hybrid gasoline/electric power) will mean increasingly that people who are blind or have low vision will not be able to rely on hearing traffic noise as they approach kerbs, and the provision of TGSIs on kerb ramps will therefore become more critical to safety.

In our view, the current Draft Standards do not guarantee a level of safety within premises for people who are blind or have low vision that is consistent with the Objects of the DDA and Australia's obligations under the UN Convention. People who are blind or have low vision expect that a responsible, inclusive society will do what is necessary to allow them to use premises with the same level of safety that is expected by and provided for the rest of the community.

Accordingly, we strongly urge the Committee to remove the exemptions for the provision of TGSIs and sufficient luminance contrast. In general, our view is that all stairs should include such features.

3.2 Glazing on Accessways

Part D3.12 of the Access Code requires that glazed surfaces on accessways must be clearly marked (in accordance with Australian Standard AS1428.1) if they are capable of being mistaken for a doorway. Vision Australia believes that this requirement needs to be strengthened.

People who have low vision are generally much more likely than the rest of the community to mistake glazed surfaces for doorways and other openings. This is because they are often not able to detect the low levels of reflected light from transparent surfaces such as glass, and also because they often have a limited field of vision that makes it difficult or impossible to detect visual cues that alert others to the presence and extent of glazed surfaces (such as the join where the glass meets the floor, ceiling or adjacent walls). What this means in practice is that glazed surfaces can be virtually invisible to many people who have low vision.

We have two concerns with the current requirement in the Draft Standards:

- Firstly, the likelihood that a particular glazed panel will be mistaken for an opening will depend on a number of factors, such as ambient light and the proximity of other cues; we do not believe that building developers are best placed to assess this likelihood, because they are generally not familiar with the complexities of vision loss. Making the requirement dependent on the assessment of a building developer unacquainted with all the contributing factors will thus lead to unpredictability and uncertainty for people who have low vision, and the overall result will be an increased safety risk.
- Secondly, limiting the requirement to provide markings to glazed surfaces on accessways overlooks the reality that people with low vision will often encounter glazed surfaces that are not on accessways; their safety is just as important in these circumstances.

The provision of markings to allow people who have low vision to distinguish glazed surfaces from doorways is a key safety feature. We are aware of serious, and in some cases permanent, injuries that have been caused when people with low vision have attempted to walk through what they believed was a doorway but which was, in fact, a closed glass window. While large expanses of glazing probably present a hazard for the entire community, they present a much greater hazard for people who have low vision.

Accordingly, our view is that all frameless glazed surfaces should be marked in accordance with AS1428.1 when there is no chair rail, handrail or transom.

3.3 Braille and Tactile Signage

The provision of tactile and braille signage is the only wayfinding device included in the Draft Standards (we do not regard features such as hazard-warning TGSIs and luminance contrast as wayfinding devices per se—rather, they are safety features). However, there are several cases where there is no specific requirement to provide braille and tactile signage even though other signage is required:

- Where a sign identifies an accessible sanitary facility as being right- or left-handed (D3.6 (c));
- Where there is a need for a sign to direct people to an accessible sanitary facility (D3.6 (f));
- Where a sign identifies the location of an ambulant sanitary facility within a sanitary facility block (D3.6 (d));
- Where there is a sign that provides direction to an accessible entrance to a building (D3.6 (e));
- Where a sign is used within a room to identify the type and coverage area of a hearing augmentation system (D3.6 (b)).

Perhaps the omission of the words "braille and tactile" in these cases is an oversight. In any case, Vision Australia's strong view is that if signage is considered necessary to provide useful information to the public, then people who are blind or have low vision are just as entitled to this information as other members of the public. To this extent, providing braille and tactile signage is a fundamental issue of access and equity consistent with the Objects of the DDA and the UN Convention. Moreover:

- People who are blind or have low vision often prefer to use accessible sanitary facilities because such facilities are easier to navigate and provide more space for dog guides. Accordingly, people who are blind or have low vision need to be able to locate such facilities when signage is used to direct people to them from another location within the building.
- People who are blind or have low vision not infrequently have responsibilities as carers of people with other disabilities, and so need to be able to easily find accessible facilities (including ambulant facilities) and entrances.

Vision Australia therefore submits that all signage required to be provided by the Premises Standards be required to include braille and tactile components.

There are also a number of other situations where braille and tactile signage should be provided, but where there is no requirement to do so in the Draft Standards. These include:

- Numbers on the doors of hotel rooms, offices, etc., to allow people who are blind or have low vision to locate them;
- Numbers on stair landings to allow the identification of floors in buildings;
- Numbers within reach of lift openings to allow the identification of floors, especially in situations where lifts are not required to be equipped with audio announcements (that is, where they only serve one or two levels (Table E3.6 (b))).

It is our understanding that such signage would fall within the scope of the Standards, and that it would currently be provided in print for the rest of the community.

Braille and tactile signage could be provided at minimal cost, and would have significant benefits for people who are blind or have low vision.

We recognise that there are also many situations where signage may be regarded as falling outside the scope of the Premises Standards in their current form because such signage relates to fitout; however, we would expect such issues to be addressed in a future review, and in the meantime, we urge building owners to provide braille and tactile signage wherever signage is provided.

3.4 Class 2 Buildings

We have already referred to the need for safety features such as TGSIs and adequate luminance contrast (including contrast strips on stair nosings), to be included in Class 2 buildings. Vision Australia is extremely disappointed that the current Draft Standards contain a blanket exemption for these buildings. This was not the case with the previous Draft (2004), and the removal of the access requirements (including access to the common areas of such buildings) is a most retrograde step, the effect of which is to deny people with disability any access to a significant number of buildings that are available to the public. We cannot imagine that the exemption for Class 2 buildings is in any way consistent with the Objects of the DDA and Australia's obligations under the UN Convention. We note also that local building development authorities already have requirements for access features in Class 2 buildings within their jurisdiction, and the inconsistency between these and national Premises Standards that exempts Class 2 buildings will lead to confusion and uncertainty.

Vision Australia does not believe that the Premises Standards can be accepted unless access is mandated for Class 2 buildings, at least to the extent that it was included in the 2004 Draft of the Standards (but also including the provision of the safety features already discussed).

3.5 Carparks

Performance Requirement DP1 In the Draft Premises Standards requires that access must be provided to a building from the road boundary, and from an accessible car space if there is a carpark attached to the building. However, this does not mean that a person who is blind or has low vision will be able to enter the building safely.

It is becoming common for premises such as shopping centres to have their entrance directly from the carpark, that is, there is no streetfront entrance. If a person who is blind or has low vision wishes to enter such a building, they will have to walk through the carpark. However, there is currently no requirement in the Draft Premises Standards for there to be an accessible path of pedestrian travel through the carpark, only from an accessible carspace, which is likely to be impossible for a person who is blind or has low vision to find. Even in those cases where buildings do have streetfront entrances, it may not always be possible to use them. If a person is taken to a building by a taxi or colleague, they may have to enter via the carpark if the street approach is zoned as "no stopping" or "no standing" (which is often the case, for example, in many main streets in Sydney).

The need for a safe and accessible pedestrian path of travel becomes even more critical when it is remembered that there is an increasing number of people who are blind or have low vision in older age groups. Without adequate consideration to the need for safe and accessible premises entry via carparks, an increasing number of Australians will be effectively excluded from visiting shopping centres and other public buildings.

Vision Australia therefore urges the Committee to amend the Draft Standards so that they include provisions for safe pedestrian access to premises from carparks.

3.6 Lighting

Adequate lighting is a key access feature for people who have low vision. The current Draft Premises Standards only specify levels of lighting sufficient to provide access for people who have low vision in connection with the areas of Class 9b (public transport) buildings that are used by passengers (Part H2.12). Yet access to other classes of buildings is just as dependent on adequate lighting.

Vision Australia therefore recommends that the Draft Premises Standards include provision similar to those in H2.12.

4

Comments on Specific Provisions

This section provides brief comments on specific provisions of the Draft Standards and the Access Code. References use the numbering in the Standards. The comments do not refer to provisions that have already been implicated by the discussion of general issues in the previous section of this submission.

1.3: Objects

Vision Australia suggests adding the word "dignified" to the description of access. This is more consistent with the principles of the UN Convention, and draws the attention to the need for access to be provided in a manner that respects the inherent dignity of people with disability.

D3.4 (Exemptions) (f) (ii) (areas of less than ²⁰⁰m²)

We are concerned that if this exemption remains unchanged, it will result in unpredictable use of TGSIs from the perspective of a person who is blind or has low vision and who uses premises that are open to the public. While technical exemptions may be predictable from the perspective of a building developer who is familiar with the Standards, an end-user is not. The provision of TGSIs and luminance contrast features is primarily a safety issue, and for them to be effective, their use must be predictable. People who are blind or have low vision must be able to rely on TGSIs and luminance contrast

features being used where they would expect them to be used (on stairs, ramps, etc.).

We therefore believe that at the very least, this exemption should be modified to require the provision of these features.

D3.8 (Tactile indicators) (1) (e) (i)

While TGSIs can be used to provide a warning of overhead obstacles, our view is that a better solution is to ensure that there is always a barrier around such obstacles. We are not aware of any situations where providing a barrier would be difficult or costly, and accordingly we recommend that this provision be amended.

D3.9 Wheelchair Seating Spaces

We support this clause, however we recommend that it be extended to require the provision of extra space in front or under some seating in a Class 9b assembly building (such as a theatre or cinema) to accommodate the needs of people who use dog guides ("guide dogs"). Such seating could be provided in the same ratio as for wheelchair seating in these buildings.

D4.2 (Location of Braille and tactile signs) (c) (ii)

We recommend that when a sign is mounted on a door (because it cannot be mounted on the wall near the door), then the location of the sign be more precisely specified (for example, 50-100mm from the latch side of the door). This will provide a consistent location, and thus make it easier for people who are blind or have low vision to find the information contained on the sign.

D4.6 Braille

We recommend that this section be moved to directly follow or be part of D4.3 (Braille and Tactile Sign Specifications). At present, D4.3 only contains the specifications for the tactile (non-braille) components of signs, even though the heading is "Braille and Tactile Sign Specifications".

D4.6 (Braille) (a) (Braille specifications)

This clause refers to criteria developed by the Australian Braille Authority. These criteria have not, in fact, been developed, and we recommend that the Committee liaise with the Australian Braille Authority to ensure that a suitable document is available for reference in the Standards by the time they are finalised.

D4.6 (Braille) (c) (Location of braille)

We think the wording is unclear here. Since there is no specification for the height of a descender on a tactile character, the inclusion of the parenthetical

"not including descenders" means that the braille would be too close to the tactile text above it if that text contained several descenders. This would make it more difficult to read the braille.

D4.6 (Braille) (h) (Arrows)

We do not believe that it is appropriate to use "solid arrows" since they are more difficult to interpret by touch; we recommend that AS1428.1 be referenced here, because the arrow therein described (one in which there is a wide angle between the barbs and the shaft and where the angle is not filled-in) is much more distinguishable than a solid arrow.

5

Issues Requiring Further Work

5.1 Wayfinding

Wayfinding refers to a range of techniques used by people who are blind or have low vision as they move from place to place, independently and safely. "Wayfinding is typically divided into two categories: orientation and mobility. Orientation concerns the ability for one to monitor his or her position in relationship to the environment; and mobility refers to one's ability to travel safely, detecting and avoiding obstacles and other potential hazards. In general terms, wayfinding is the ability to; know where you are, where you are headed, and how best to get there; recognize when you have reached your destination; and find your way out—all accomplished in a safe and independent manner ..." (*US Department of Education, NIDRR (National Institute on Disability and Rehabilitation Research)*)

Wayfinding thus encompasses far more than braille and tactile signage, and safety features such as TGSIs and luminance contrast. For example, it includes being able to access information on noticeboards and tenant directories, being able to independently locate key parts of a building such as the lifts or reception area, and having access to other orientation information that is available to the rest of the community explicitly (for example, through a map that is provided near the building entrance) or implicitly via visual cues.

Vision Australia is aware of the difficulties that the Building Access Policy Committee has encountered in attempting to address the general issue of wayfinding for people who are blind or have low vision. We are aware of the research that was released in 2004 by the Cooperative Research Centre (CRC) for Construction Innovation, and that this research did not lead to outcomes that could be incorporated into the Premises Standards in the form of deemed-to-satisfy provisions. There is clearly a need for more research to identify best-practice solutions regarding wayfinding, and it is very unfortunate

that nothing further has been done since the CRC report was released in 2004.

Even though it has not been possible to develop provisions for wayfinding, the fact remains that the current Draft Standards do not provide equal, independent and dignified access to premises for people who are blind or have low vision. Such a situation is not acceptable in the medium- to long-term, and we call on the Committee to take a proactive, leadership role by ensuring that all wayfinding issues are fully addressed in the first Review of the Standards. In the meantime, we also seek the inclusion in the Standards of advice that DDA complaints are allowable where a person with a disability believes that they have been discriminated against because of a failure to provide wayfinding information.

5.2 Fitout and Fixtures

We recognise that the current Draft Standards are limited to those aspects of premises that are covered by the Building Code of Australia, and that they therefore do not cover such areas as fitout and fixtures in buildings. We note, however, that a comprehensive set of Premises Standards developed under the DDA should include such areas, and that Australia's obligations under the UN Convention also include the provision of access to all aspects of premises that are available to the public. We therefore look to the Committee to begin work on issues of fitout and fixtures once the current Draft Standards have been finalised.

We have already referred to the need for increased braille and tactile signage. There are many other aspects of fitout that have access implications for people who are blind or have low vision, and we will provide a detailed discussion when such issues are being addressed. For now, we note that a trend that we have observed in the last year or so is for accessible sanitary facilities to incorporate visual cues such as flashing lights to signal when a facility is locked or open, buttons to control the locking/unlocking of the facility, and flushing mechanisms that rely on motion or other types of sensor. We have so far not found any instances where such facilities have taken account of the access needs of people who are blind or have low vision, and the ironic outcome is that there is a growing number of accessible sanitary facilities that are not accessible to people who are blind or have low vision. While we certainly support features that increase access for people with disability generally, we believe that new technologies should only be introduced after consultation with the sector, and that greater attention needs to be given to ensuring that people who are blind or have low vision are able to access them. At the very least, accessible sanitary facilities that rely on the use of visual information must include non-visual (audio and tactile) alternatives.

This is one example of a fitout issue that is not covered by the Draft Premises Standards but which is starting to have a very real impact on people who are blind or have low vision. The extent of this impact is likely to increase unless

such issues are addressed via the Premises Standards. We therefore strongly urge the Committee to begin work on expanding the scope of the Standards as soon as practicable.

5.3 Emergency Egress

It goes without saying that people who are blind or have low vision should have their needs taken into account in the design of systems for the same evacuation of people from premises in emergency situations.

Article 9(1)(b) of the UN Convention refers to the right of people with disability to have equal access to emergency services, which we interpret to encompass emergency egress from buildings.

The current Draft Standards do not contain comprehensive provisions relating to safe emergency egress for people who are blind or have low vision. There are numerous components of a safe emergency egress strategy. While some of these fall outside the scope of the Premises Standards (for example, the need for information on egress procedures to be available in accessible formats) there are a number of design features that the Premises Standards can address. These include:

- Adequate lighting of emergency egress routes
- Braille and tactile signage of emergency egress stairways and exits
- The need for wayfinding features such as directional TGSIs to provide an accessible path of travel from emergency exits to designated assembly points.

Vision Australia believes that this issue must be given high priority so that such provisions are available for inclusion as part of the first review of the Standards.