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BY: LACA

AUSTRALIAN BLINDNESS FORUM

ABN 47 125 036 857

All correspondence to:

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

March 2009

About the Australian Blindness Forum

The Australian Blindness Forum (ABF) was formed in 1992 and, in 2007, was registered as an Australian public company limited by guarantee. It is funded through the contributions of its members, the major Australian organisations that serve people who are blind or vision impaired, and the national consumer organisation, Blind Citizens Australia. This submission is made following consultation with members and represents a sector response.

Members of the ABF, reflecting the Australian Government's policy on social inclusion, are committed to assisting people who are blind or vision impaired to become and remain independent, valued and active members of the community.

The main purposes of the ABF are to:

- Encourage exchange of information between members
- Exert influence on Government policy development
- Enable blindness sector representation both nationally and internationally
- Enable Australia to facilitate its membership of the World Blind Union
- Encourage and promote the development and equity of the level of services throughout Australasia

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Introduction

The ABF welcomes the release of the Draft Disability (Access to Premises – Buildings) Standards (Premises Standards) and their promise of delivering better access for people with disability and better certainty for building owners, operators and builders.

The ABF takes this opportunity to draw attention to the particular needs of people with vision loss that must be addressed if the Premises Standards are to prevent the incidence of current exclusionary practices.

Currently there are 500,000 Australians with vision loss, including 50,000 who are blind, 4,000 of whom have a form of deafblindness. This total is estimated to increase to nearly 800,000 by 2024.¹

This submission is structured as follows:

- List of recommendations;
- Section 1 presents comments on the Principles Underpinning the Premises Standards;
- Section 2 considers Contentious Issues including the exclusion of wayfinding and emergency egress;
- Section 3 provides some Comparison with the 2004 Draft and Other Comments on Specific Standards; and
- Section 4 provides a Conclusion and acknowledgements.

Recommendations

Recommendation 1

The ABF recommends that in assessing any provisions in the Premises Standards the Committee must comply with the provisions of the Convention.

Recommendation 2

The ABF recommends that where unjustifiable hardship is used to justify the exclusion of people with disability the provision of no access is not appropriate and the Premises Standards needs to reflect this.

Recommendation 3

The ABF recommends that the term 'safe, equitable and dignified access' be included in the final version of the Premises Standards.

Recommendation 4

The ABF recommends that consideration of the Premises Standards and AS1428.4.1 be aligned.

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

Recommendation 5

The ABF recommends that both Standards Australia and the Commonwealth Government ensure that all materials are accessible to people who are unable to read print.

Recommendation 6

The ABF recommends that:

- The current version of the Premises Standards be rewritten in a manner that allows wayfinding issues to be easily inserted before the scheduled five-yearly review
- The jurisdiction under which complaints about wayfinding issues can be lodged is clarified
- Given the importance of accessible signage to wayfinding, accessibility be required for all signage and not restricted to toilets and lifts as proposed and the Premises Standards reflect this. (See later comments regarding clause D3.6.)

Recommendation 7

The ABF recommends the inclusion of emergency egress design elements which ensure the safe evacuation of people who are blind or have low vision.

Recommendation 8

The ABF recommends that lighting of public space be included in the Premises Standards.

Recommendation 9

The ABF recommends that, at these reviews, the various parts of the Premises Standards are harmonised without loss of access or amenity for people with disability

Recommendation 10

The ABF recommends that, as a matter of priority, disability access standards covering all types of premises must be developed and either added to the Premises Standards or allowed to stand alone as per the Disability Standards for Accessible Public Transport.

Recommendation 11

The ABF recommends that a requirement for a clearly identified logical and safe accessway for pedestrians to enter a shopping or other similar centre be mandatory under the Premises Standards.

Recommendation 12

The ABF recommends that the common areas for Class 2 or 3 Buildings are accessible – this includes the foyer, lifts, laundry and other areas as listed in Table D3.1. The Premises Standards should include the mandatory provision of TGSIs and contrast nosings on stairs, marking on glazing and accessible signage for all facilities in common areas.

Recommendation 13

The ABF recommends that the exemption in D3.4 be amended as it currently

effectively precludes people who are blind or have low vision from safely using stairs in a significant number of premises, 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

The ABF recommends that specifications be developed and included for commercial driveways and directional TGSIs.

Recommendation 16

The ABF recommends that the exemption of fire isolated stairs be removed.

Recommendation 17

The ABF recommends 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

The ABF recommends that the exclusion of health-care buildings be removed.

Recommendation 19

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

Recommendation 20

The ABF recommends that specification clause D3.6 be replaced and other specifications reflecting those of Part H included.

Recommendation 21

The ABF recommends that clause D4.2 (c) (ii) also includes the 50mm to 300mm requirement from the latch side of the door.

Recommendation 22

The ABF recommends that the Standard clarifies precisely which case is meant.

Recommendation 23

The ABF recommends that the Committee liaise with the ABF and the Australian Braille Authority to ensure that a suitable document is available for reference by Standards Australia.

Recommendation 24

The ABF recommends that the placing of Braille with descenders be clarified.

Recommendation 25

The ABF recommends that AS1428.1 be referenced as 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.

Recommendation 26

A communication device, identified by a Braille / tactile sign that allows for a call for the controls to be unlocked, must be located at each lift landing.

Recommendation 27

The ABF recommends that Accessible Toilet locking mechanisms have controls useable by people who are blind or have low vision and included as a requirement of the Access to Premises Standards within section F2.4.

Recommendation 28

The ABF recommends that the final version of the Premises Standards 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.

1. Principles Underpinning the Premises Standards

UN CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES

Australia was one of the first countries to ratify the Convention. The following Convention articles relate to the intent of the Premises Standards.

Article 1: Purpose

The purpose of the present Convention is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.

Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

Article 3: General Principles

- Full and effective participation and inclusion in society
- Accessibility

Article 9: Accessibility

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 ... which shall include the identification and elimination of obstacles and barriers to accessibility to

- a. buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces.
2. To 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 in building and other facilities open to the public signage in Braille and in easy to read and understand forms

Article 19: Living independently and being included in the community

- a. persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others

Currently, the Australian Government is consulting with all stakeholders on the adoption of the Optional Protocol. Under the Optional Protocol, a person who considers that Australia has not complied with the Convention and has exhausted all domestic remedies can lodge a complaint with a specialised UN Committee.

Recommendation 1

The ABF recommends that in assessing any provisions in the Premises Standards the Committee must comply with the provisions of the Convention.

DISABILITY (ACCESS TO PREMISES – BUILDINGS) STANDARDS GUIDELINES

The ABF supports the principle articulated in Part 5, Exceptions and Concessions at point (8) of the Guidelines that states:

'Where a person responsible for a building does not provide full and equitable access in an existing building (including heritage buildings) because they believe this would involve unjustifiable hardship, providing no access at all would not be appropriate [emphasis added].'

Recommendation 2

The ABF recommends that where unjustifiable hardship is used to justify the exclusion of people with disability the provision of no access is not appropriate and the Premises Standards needs to reflect this.

DISABILITY DISCRIMINATION ACT 1992

As the Premises Standards support the aims of the Disability Discrimination Act 1992 (DDA), it is concerning that the term 'safe, equitable and dignified access', as used in the DDA and in the performance requirements of the current Building Code of Australia (BCA), is missing from the Premises Standards.

Recommendation 3

The ABF recommends that the term 'safe, equitable and dignified access' be included in the final version of the Premises Standards.

2. Contentious Issues

ALIGNMENT OF THE BUILDING CODE OF AUSTRALIA (BCA) AND AUSTRALIAN STANDARDS WITH THE PREMISES STANDARDS

Once the Premises Standards are adopted, the BCA section on 'Access for People with Disabilities' and the AS1428 suite of standards, which covers design for access and mobility, will require amendment to reflect the Premises Standards.

The ABF is aware that the new drafts of AS1428.1 (200X) and AS1428.4.1 (200X) have just been released. The ABF is concerned that the consultation for the Premises Standards and AS 1428.4.1 are being conducted in isolation when in fact they need to be aligned.

Recommendation 4

The ABF recommends that consideration of the Premises Standards and AS1428.4.1 be aligned.

Given the focus on accessibility, it is unacceptable and an issue raised on numerous occasions by ABF member organisations, that the Australian Standards themselves remain unavailable in accessible formats. This, in itself, is a breach of Standards Australia's obligations under the DDA.

Recommendation 5

The ABF recommends that both Standards Australia and the Commonwealth Government ensure that all materials are accessible to people who are unable to read print.

WAYFINDING

Wayfinding has many definitions. However, for people who are blind or have low vision, the ABF believes the following is the most appropriate definition:

'Knowing where you are, where you are headed, and how best to get there; recognise when you have reached your destination; and

find your way out – all accomplished in a safe and independent manner.’²

When drafting of the Premises Standards began in 2002, it was agreed by stakeholders that research was needed on wayfinding to identify the issues and potential solutions in a form deemed-to-satisfy technical requirements that might be included in the Premises Standards.

The research was undertaken by CRC Construction Innovation and other partners including the Australian Building Code Board (ABCB). Organisations representing people who are blind or have low vision were also involved in collecting the data for the research.

However, the resulting report, ‘Wayfinding in the Built Environment’ released in July 2004, was considered to lack a clear set of specifications that could be put into the Premises Standards. The ABCB subsequently published a guideline on wayfinding and CRC Construction Innovation and the Queensland Government another guideline and audit tool. Whilst there are now tools and specifications available, nothing encompassing the wider elements of wayfinding has been included in the Premises Standards.

The draft Premises Standards has some limited coverage of Braille and tactile signs, luminance contrast, lighting and tactile indicators. However, wayfinding is much more than these – it is about the ease with which a person proceeds and is facilitated through an environment from one point of interest to another. Wayfinding systems include the basic layout of a building and site, interior and exterior landmarks, views to outside, signs, floor and room numbering, spoken directions, maps, directories, logical progression of spaces, colour coding.

It is the ABF’s strong belief that wayfinding needs to be included in the Premises Standards.

The BCA only incorporates requirements for Braille and tactile signage of facilities such as toilets and lifts in an extremely limited fashion. ABF members believe that wayfinding must cover a far broader range of accessible signage (Braille and tactile) which includes items such as tenants’ boards, maps, location of facilities, and other orientation cues. Further, luminance contrast and lighting are important elements of making signage accessible.

Signage that is required to provide information for the general public should also be available to people who are blind or have low vision. If accessible signage was linked to wayfinding, people would soon know what to look for and where to look. Until this happens, the proliferation of visual-only signs on and in public buildings will go largely unchecked and discrimination will continue against people who are blind or have low vision.

The ABF is aware that people who are blind or have low vision are tired of their specific access needs being ignored and strongly protests at the

² US Department of Education’s National Institute on Disability and Rehabilitation Research

exclusion of wayfinding from the Premises Standards. Given the attempts to have wayfinding included during the years of drafting the standards, this exclusion is unacceptable.

People who are blind or have low vision have been cautious about complaining about the lack of wayfinding, but this cannot be construed as a lack of desire to raise awareness of their access needs, rather a reflection of the uncertainty about jurisdiction and delays while awaiting the outcomes of research.

Given the lack of wayfinding as an accessibility criterion and the availability of research and tools as mentioned above, the ABF has written to the Attorney-General expressing its concern and asking for clarification of whether complaints on wayfinding issues will still be possible under the DDA after the Premises Standards are finalised. The ABF believes that it will be unacceptable and discriminatory if such complaints cannot be considered under the DDA, particularly since the current Premises Standards has such limited coverage of wayfinding.

Recommendation 6

The ABF recommends that:

- **The current version of the Premises Standards be rewritten in a manner that allows wayfinding issues to be easily inserted before the scheduled five-yearly review**
- **The jurisdiction under which complaints about wayfinding issues can be lodged is clarified**
- **Given the importance of accessible signage to wayfinding, accessibility be required for all signage and not restricted to toilets and lifts as proposed and the Premises Standards reflect this. (See later comments regarding clause D3.6.)**

EMERGENCY EGRESS

Emergency egress is noted within the BCA performance requirements but is not expanded upon in Part D3 where other elements such as carparking are included. There is a passing mention of emergency egress for people with vision loss to locate the exit path (at H2.14). However, this does not extend to any co-located general buildings, causing an unnecessary break in continuity.

There are also many design elements that would be necessary for safe egress of people who are blind or have low vision that are not included within the Premises Standards such as:

- Standards for lighting are silent on accessibility
- Accessible signage for exits is not included
- Tops and bottoms of stairs may have TGSIs but not stairs or accessways leading to or for holding areas after evacuation

The BCA is in conflict with the Premises Standards because of its lack of coverage of emergency egress.

Recommendation 7

The ABF recommends the inclusion of emergency egress design elements which ensure the safe evacuation of people who are blind or have low vision.

3. Comparison with 2004 Draft and Other Comments on Specific Standards

The Premises Standards is somewhat of a diminution of the 2004 draft, which is unfortunate. The 2004 draft was considered barely adequate by most commentators from the disability sector. Diminishing the rights of people with disability yet further is hardly welcome. Comments on some specific standards and some comparison between the 2009 and 2004 drafts with pertinent comments are set out below.

PART 1.3 OBJECTS

The ABF queries the appropriateness and effectiveness of the proposed Premises Standards in achieving their first object:

1.3(a) to ensure that reasonably achievable, equitable and cost-effective access to buildings, and facilities and services within buildings, is provided for people with disabilities

Defining the minimum acceptable standard of access for people with disability to buildings and the facilities and services within buildings will improve a component of the built environment and provide certainty for all parties in the areas covered by the Premises Standard. However, the Premises Standards have shortcomings in the following areas: Lighting, Public Transport Premises, and Paths of Travel Between Buildings. More detail is given in the sections below.

LIGHTING

No requirements for 'accessible' lighting exist except in Part H2.12. This is a serious omission. Many people with vision impairment require strong, even lighting to follow an access path and locate signs. People who are hearing impaired in addition to having low visual acuity require correct illumination to lip read when interacting with staff at service counters and similar.

Recommendation 8

The ABF recommends that lighting of public space be included in the Premises Standards.

PART H2 PUBLIC TRANSPORT BUILDINGS

Class 9b Public Transport Premises

Considerable inconsistencies exist between Part H and the other parts of the Premises Standards. Particularly in terms of specifications for accessways, wayfinding and lighting, Part H appears to be superior from the perspective of a person who has a disability. As the Premises Standards must undergo five-year reviews:

Recommendation 9 The ABF recommends that, at these reviews, the various parts of the Premises Standards are harmonised without loss of access or amenity for people with disability.

PATHS OF TRAVEL BETWEEN BUILDINGS

The Premises Standards will, unfortunately, only regulate premises that currently fall under the purview of the BCA and the Disability Standards for Accessible Public Transport.

In its Section 4 Interpretation, the DDA defines 'premises' to include:

- (a) a structure, building, aircraft, vehicle or vessel; and
- (b) a place (whether enclosed or built on or not); and
- (c) a part of premises (including premises of a kind referred to in paragraph (a) or (b)).

Clearly, the bulk of premises, including the accessways connecting the premises regulated by the above, will remain outside the scope of the Premises Standards and subject to the arbitrary regulation by their public or private owners, tenants or managers.

While subject to the DDA, alleged breaches in areas not regulated by a DDA Standard can only be determined to be breaches following public complaint and subsequent court decision. In such actions, neither complainant nor respondent have any nationally accepted point of reference under which an appeal for compliance under the DDA can be made.

Recommendation 10

The ABF recommends that, as a matter of priority, disability access standards covering all types of premises must be developed and either added to the Premises Standards or allowed to stand alone as per the Disability Standards for Accessible Public Transport.

PART D3 ACCESS FOR PEOPLE WITH DISABILITY

D3.2 Access to Buildings

Shopping or other centres: There is an overarching assumption that everyone accesses a centre through the car park. As a result many new centres have no discernible pedestrian entry other than through the car park. When people with vision loss arrive at a centre by bus, taxi or dropped off by family or

friends, they will have no way of locating the entrance from the road.

Recommendation 11

The ABF recommends that a requirement for a clearly identified logical and safe accessway for pedestrians to enter a shopping or other similar centre be mandatory under the Premises Standards.

Table D3.1

Class 2 (apartments): Despite the argument of the building industry that no areas of class 2 buildings should need to be accessible unless they are serviced apartments, the ABF believes this class of building should be accessible to people with disability, including those who are blind or have low vision. Just like other Australians, they will have family and friends living there or may wish to purchase one of the apartments for their own use.

Class 3 (common place of long-term or transient living for a number of unrelated persons): The common areas of such buildings (for example, the foyer, laundry, sauna) used by residents and visitors are required to be accessible. However, this does not include features to assist people who are blind or have low vision. Accessibility, in its broadest sense, includes accessible signage, visual barriers on glazing, TGSIs and contrast nosings on stairs.

Recommendation 12

The ABF recommends that the common areas for Class 2 or 3 Buildings are accessible – this includes the foyer, lift, laundry and other areas as listed in Table D3.1. The Premises Standards should include the mandatory provision of TGSIs and contrast nosings on stairs, marking on glazing and accessible signage for all facilities in common areas.

D3.4 Exemptions

The Premises Standards includes exemptions for stair wells in the following circumstances:

D3.4 (f) in a Class 5, 6, 7b or 8 building:

- (i) containing not more than 3 storeys; and
- (ii) with a floor area for each storey, excluding the entrance storey, of not more than 200m²; a storey or level other than the entrance storey, except if the storey or level is served by a ramp complying with AS 1428.1 or a passenger lift

This was not included in the 2004 Draft.

This exemption will exclude people not able to climb stairs from all but the entrance storey of a significant proportion of commercial buildings in regional and suburban retail centres.

Further, it fails to address common two storey developments located on a single block that have a number of tenancies which share walls, but are not

connected to each other by accessways, except at ground / entrance level.

Similarly, where the upper storey of each tenancy is less than 200 m² but the gross floor area for the building's upper storey exceeds 200 m². It is unclear how D3.4 (f) would be applied under these and other circumstances. D3.4 (f) must be revisited to clarify the multiple tenancy scenario and the floor area trigger for unjustifiable hardship and this scaled down to 100 m² for each storey.

Recommendation 13

The ABF recommends that the exemption in D3.4 be amended as it currently effectively precludes people who are blind or have low vision from safely using stairs in a significant number of premises, effectively denying access.

D3.6 Signage

The stipulation for Braille and tactile signage under the Premises Standards only covers sanitary facilities and, while it does refer to section D4 (Braille and tactile signs), the specific requirements for such signage are not explained in each of this section's sub-clauses.

The Guidelines accompanying the Premises Standards, page 10, Clause 5.1 (8), advise that where full and equitable access in an existing building is not believed to be possible the provision of no access at all would not be appropriate. This statement is hidden in the section under unjustifiable hardship but the intent of this statement does not appear to permeate throughout the Standards.

Accessibility in the broadest sense covers the needs of all people with disability and should apply to signage allowing all people who are blind or have low vision to independently access the public facilities that those with sight are able to do so.

There are no requirements for general signage on public buildings to be accessible. People with vision loss moving about independently have great difficulty in locating a building if the external signage cannot be read by them. Once inside the building, this is exacerbated by their inability to find a particular room if the numbering is not Brailled and/or tactile.

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)**

D3.8 Tactile Indicators

The Premises Standards include D3.8 (3) which is an additional clause not included in the previous draft.

Commercial driveways crossing footpaths at-grade are not explicitly covered in D3.8. These are usually outside the property boundary but are normally constructed by the developer as part of the building project. The ABF believes that Standards Australia needs to be directed to liaise with the Australian Local Government Association to develop appropriate specifications and that these are to be mandatory in subsequent editions of the Premises Standards.

Wayfinding via directional TGSIs, and the circumstances which require directional TGSIs, are also not covered. As per commercial driveways Standards Australia should be directed to liaise with the ABCB in order to develop appropriate 'on site' specifications and these referenced in subsequent editions of the Premises Standards.

Recommendation 15

The ABF recommends that specifications be developed and included for commercial driveways and directional TGSIs.

Fire Isolated Stairs

In many buildings fire stairs and ramps provide vertical access to other floors and are not kept exclusively for use during a fire emergency.

Fire isolated ramps and stairs are excluded from the requirement to have tactile indicators. This is unsatisfactory and potentially hazardous as the exclusion prevents people with vision loss from using the stairs in normal daily situations (as would happen with many sighted people), as well as from independently leaving the building in an emergency. There are no circumstances in which the ABF can envisage such an exemption is warranted.

Recommendation 16

The ABF recommends that the exemption of fire isolated stairs be removed.

Suitable Barrier

The Foreword to Australian Standard AS1428.4.1 (draft and current) comments on the purpose of TGSIs and the population that requires them.

However, the inclusion of the requirement to use TGSIs in the absence of a suitable barrier is potentially hazardous. The current exclusion relating to obstructions less than 2m above the floor level is counter-intuitive and overhead obstructions less than 2m still need to be 'barriered off' to provide the necessary safety.

Similarly, there should be suitable barriers for an overhead obstruction, such as posts or rails used in shopping centres to isolate the area under escalators. However, the ABF cautions against over-zealous application of indicators as they should be used more for the other hazards mentioned in both the Premises Standards and the revised AS1428.4.1.

Recommendation 17

The ABF recommends 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.

Health-care building

It is concerning that Class 9a health-care buildings need not comply with paragraphs 9(1) (a) and (d), TGSIs if handrails incorporating a raised dome button in accordance with the requirements for stairway handrails in AS1428.1 are provided to warn people who are blind or have low vision that they are approaching a stairway or ramp.

The ABF does not believe that the raised dome provides sufficient information or warning with regard to the potential hazard.

Recommendation 18

The ABF recommends that the exclusion of health-care buildings be removed.

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. The ABF believes that this requirement needs to be strengthened.

Firstly, the ABF does not believe that building developers are best placed to decide whether a particular glazed surface is capable of being mistaken for a doorway, because of the number and complexity of the factors that must be considered, including ambient lighting, and the diversity of vision loss. Secondly, limiting the requirement to provide markings to glazed surfaces on accessways overlooks the reality that many people with low vision will encounter glazed surfaces that are not on accessways, and 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. The ABF is aware of serious injuries that have been caused when people think that they are approaching a doorway when in fact they are approaching a large panel of glass. 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.

Recommendation 19

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

PART D4 BRAILLE AND TACTILE SIGNS

D4.2 Location of Braille and tactile signs

The ABF is concerned and does not accept the deletion of wayfinding signs which had been included in the previous draft under Specification D3.6 Braille and tactile signs.

2.1 Location of Braille and tactile signs

(d) Signs identifying paths of travel must be placed so they are located directly ahead in the direction of travel. Where one wall continues in the direction of travel and the other forms a corner, the sign must be placed on the continuing wall.

Loss of a technical specification for wayfinding signage will make standardised placement difficult, with resulting disorientation. Especially for people who are blind or have low vision, consistent placement of signs is vital to locating the sign, enabling its information to be of use in wayfinding.

Recommendation 20

The ABF recommends that specification D3.6 be replaced and other specifications reflecting those of Part H included.

Clause D4.2 (c) (i) requires a sign to be 'located on the wall on the latch side of the door with the leading edge of the sign located between 50mm and 300mm from the architrave'. Establishing a similarly consistent place for the location of Braille and tactile signs (between 50mm and 300mm from the architrave on the door) will provide an expectation and consistency for people with vision loss when looking for information about a room.

Recommendation 21

The ABF recommends that clause D4.2 (c) (ii) also includes the 50mm to 300mm requirement from the latch side of the door.

D4.3 Braille and tactile sign specification

Clause (2) requires Sentence case (upper case for the first letter of each main word and lower case for all other letters) must be used for all tactile characters.

Sentence case is required but the clause's description of sign text is closer to Title case. An apparent conflict of definition between Sentence case (first letter of initial word and first letter of all proper nouns in upper case) and Title case (first letter of initial word and first letter of nouns, verbs, adverbs and adjectives in upper case) occurs.

Recommendation 22

The ABF recommends that the Standard clarifies precisely which case is meant.

D4.6 (a) Braille

This clause refers to criteria developed by the Australian Braille Authority. These criteria have not, in fact, been developed.

Recommendation 23

The ABF recommends that the Committee liaise with the ABF and Australian Braille Authority to ensure that a suitable document is available for reference by Standards Australia.

D4.6 (c) Braille

The wording in this Clause is unclear. 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.

Recommendation 24

The ABF recommends that the placing of Braille with descenders be clarified.

D4.6 (h) Braille

The ABF does not believe that it is appropriate to use 'solid arrows' since they are more difficult to interpret by touch.

Recommendation 25

The ABF recommends that AS1428.1 be referenced as 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.

PART E3 LIFT INSTALLATIONS

E3.6 Passenger lifts

Some of the lift types listed in Table E3.6 may or do require key operation. Lifts complying with AS1735.7, 14, 15 and 16 may all have key lockable controls.

As these lifts' controls will customarily be in the locked position, independent use is not possible. Where installed, building management or a designated tenant must be on standby to immediately unlock the controls on request.

Recommendation 26

A communication device, identified by a Braille / tactile sign that allows for a call for the controls to be unlocked, must be located at each lift landing.

PART F2 SANITARY AND OTHER FACILITIES

Part F2 covers the requirements of Sanitary and other facilities, with F2.4 outlining the content of the compartment only. There is no comment on the requirement to have an accessible locking mechanism.

AS 1428.1 (200X), which is referenced in part F2, covers WC doors in Clause 16.2.10. It requires that there be mechanisms to latch the door (section b)

and that there is an in-use indicator (section c). Unfortunately many “electronic door mechanisms” currently being installed in accessible toilet facilities are not accessible for people who are blind or who have low vision, resulting in many embarrassing moments. The mechanisms have no Braille or tactile signage instructions and the controls use buttons that are the same for different operations.

The difficulties of a multi function button were highlighted again recently where a woman with no vision managed by chance to open the toilet door via the touchpad sensor but, once inside, was unable to ensure that the door remained unlocked with highly embarrassing consequences.

Recommendation 27

The ABF recommends 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 Premises Standards within section F2.4.

4. Conclusion

The ABF acknowledges that the Australian Government aims to achieve greater accessibility for people with disability as part of its commitment to social inclusion for all Australians. However, the ABF believes that the Premises Standards as currently drafted are not considerate of the specific needs of people who are blind or have low vision. The ABF believes that decisions made in the planning phase of a design can have positive cost and operational impacts for the owner/developer.

The ABF also believes it is incumbent on planners, designers and developers to put maximum accessibility at the heart of their design briefs so that buildings and environments will be usable to the greatest extent possible without the need for further adaptation or specialised design.

The Royal Australian Institute of Architects is on record as giving full support for designers of buildings to do more in terms of access than is technically required, and not to limit access just because it may be allowable.³

Recommendation 28

The ABF recommends that the final version of the Premises Standards 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.

ACKNOWLEDGEMENTS

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³ *Submission to the Australian Building Codes Board on Guidelines to the Disability Standards for Access to Premises (Buildings) 200X – Consultation Draft, 30 April 2004*

- Jane Bryce, Community Education Officer, Guide Dogs NSW/ACT
 - Bashir Ebrahim, Manager Rehabilitation Services, Guide Dogs Queensland
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 - Robyn McKenzie, CEO, Blind Citizens Australia
 - Tony Starkey, Project Officer, Future Solutions Project, Royal Society for the Blind of South Australia
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