



**1.1 Australian
Braille
Authority**

A subcommittee of the
Round Table on
Information Access for
People with Print
Disabilities Inc.

2 Chair
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Submission No 111

RECEIVED
18 MAR 2009

BY:.....SM

**Submission to
House of Representatives
Legal and Constitutional Affairs Committee**

**Draft Disability (Access to Premises – Buildings)
Standards**

March 2009

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Introduction

The Australian Braille Authority ("the ABA") sets standards and develops guidelines for braille codes and usage in Australia. The ABA is a subcommittee of the Round Table on Information Access for People with Print Disabilities Inc. In addition to its standards-setting function, the ABA operates through a network of State and Territory Committees to promote awareness of braille in the community, and maintain close links with braille authorities in other countries..

The ABA believes it is important for it to provide comment on aspects of the Draft Premises Standards that specifically refer to braille. We would be pleased to appear before the Committee at its public hearing in Melbourne to provide further information.

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Specific Comments

- 1) The Draft Premises Standards (including the Access Code that forms Schedule 1 to the Standards) contain numerous references to braille, all in connection with requirements for the provision of braille and tactile signage. The ABA is pleased that the need for such signage is recognised in the Standards. However, we believe that the Standards need to go further by requiring a greater use of braille and tactile signs.
- 2) It is a fundamental principle of non-discriminatory, independent and dignified access that people who are blind and who read braille should have access to the same information that is provided to the rest of the community.



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- 3) The UN Convention on the Rights of Persons with Disabilities (“the Convention”), which Australia ratified in 2008, recognises the importance of braille, and refers to braille in five places throughout its 50 Articles. In particular, the Convention refers to the importance of braille signage in Article 9(2)d., which calls on States Parties to “Provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms;”.
- 4) In this context, we note that the Draft Premises Standards contain a number of provisions that refer to signage, but which seem to imply that braille and tactile signage is not required. These include:
 - a) Where a sign identifies an accessible sanitary facility as being right- or left-handed (Clause D3.6 (c));
 - b) Where there is a sign to direct people to an accessible sanitary facility (Clause D3.6 (f));
 - c) Where a sign identifies the location of an ambulant sanitary facility within a sanitary facility block (Clause D3.6 (d));
 - d) Where there is a sign that provides direction to an accessible entrance to a building (Clause D3.6 (e));
 - e) Where a sign within a room is used to identify the type of and area covered by a hearing augmentation system (D3.6 (b)).
- 5) In the above cases, the intention of the drafters may have been to include the words “braille and tactile”, in which case an amendment to the wording is necessary. However, if there was a deliberate decision to exempt such signage from including braille and tactile components, then the ABA strongly recommends that the Standards be changed so that such components are included in these cases.
- 6) As further evidence of the need for braille and tactile signage in the situations listed above, we note the following:
 - a) People who are blind and who read braille 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 need to be able to locate such facilities when signage is used to direct people to them from another area within the building.
 - b) People who are blind quite often have responsibilities as carers of people with other disabilities, and so need to be able to find accessible facilities (including ambulant facilities) and entrances easily.
- 7) The ABA believes that there is a need for braille and tactile signage in a number of key locations within premises that are currently not required by the Draft Standards to include such signage. These include:
 - a) Numbers on the doors of hotel rooms, offices, etc., to allow people who are blind to locate them;
 - b) Numbers on stair landings to allow the identification of floors in buildings;



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- c) Numbers within reach of lift openings to allow the identification of floors, especially in situations where lifts are not equipped or required to be equipped with audio announcements (for example, lifts that only service one or two levels in a building).
- 8) It is the ABA's understanding that requirements for such signage would fall within the scope of the current Premises Standards. Braille and tactile signage could be included in these locations at minimal cost, and would have significant benefits for braille users.
- 9) The Current Draft Premises Standards contain various exemptions to the requirement to provide access, and such exemptions also apply to braille and tactile signage.
 - a) The most flagrant exemption relates to Class 2 buildings, which are currently exempt from the Premises Standards, even though certain areas within such buildings were included as part of the access requirements in the 2004 Draft. The ABA believes that braille and tactile signage should be included in Class 2 buildings and, more generally, strongly supports their re-inclusion in the Premises Standards.
 - b) There are limitations on access requirements for Class 3 buildings, the effect of which will be to require braille and tactile signage in some areas, but not in others. Given the minimal cost of providing these signs, we recommend that braille and tactile signs be required in such buildings wherever they would be required in other cases by Clause D3.6.
- 10) The ABA notes that there are also many situations where the provision of signage is part of building fitout, and so is not covered by the current Premises Standards. 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 print signage is provided for the rest of the community.
- 11) Clause D4.6 (a) refers to "criteria developed by the Australian Braille Authority". The ABA has not been asked to develop specific criteria relating to the use of Grade 1 braille on signs, although there are general specifications for braille cell dimensions on the ABA website, at <http://www.e-bility.com/roundtable/downloads/aba/braillespecifications.rtf>. The ABA would welcome the opportunity to have further discussions with the Building Access Policy Committee about the criteria that are required before the finalisation of the Premises Standards.
- 12) The provision of braille and tactile signage is a component of wayfinding. Like all other organisations in the blindness sector, the ABA is extremely disappointed that the current Premises Standards do not include comprehensive deemed-to-satisfy provisions relating to wayfinding. If people who are blind are to have equal, independent and dignified access



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to premises that are open to the public, then they must be able to navigate around them in safety, and have access to information that is available to the rest of the community. To the extent that the current Standards fail to include wayfinding provisions, they fail people who are blind.

- 13) The ABA is aware of the complexities involved in developing a set of deemed-to-satisfy provisions about wayfinding that could be included in the Premises Standards. We are also aware that research conducted by the Cooperative Research Centre (CRC) for Construction Innovation did not identify best-practice solutions. Nevertheless, we feel that more work should have been done to develop such provisions. We call on all those involved in the development of the Premises Standards to show more leadership and ensure that there are comprehensive provisions relating to wayfinding ready for inclusion in the Premises Standards as part of the first 5-year review.
- 14) One area that needs further research is the readability of the tactile (non-braille) components of braille and tactile signs. As far as we know, there has been no research conducted to examine which specific groups prefer to use tactile signs (as opposed to signs in large print), or whether people who use tactile signs can also, or would prefer to, use braille. While the ABA supports the inclusion of tactile characters on signs if there is a demonstrable benefit, we do note that they add complexity to the signs. We therefore seek the inclusion of such research as part of more general research into wayfinding.
- 15) Similarly, there is a need for further research to determine whether Grade 1 (uncontracted) or Grade 2 (contracted) braille should be used on braille and tactile signs. The Access Guidelines developed under the Americans with Disabilities Act specify that Grade 2 should be used; the UK standard specifies grade 1; the Canadian standard specifies Grade 1 for use where there are less than 10 words on a sign, and Grade 2 where there are 10 or more words. Because Grade 1 braille does not use contractions (braille symbols and abbreviations for commonly-occurring words and letter-groups) it requires more space than Grade 2, which can be a problem where a sign occupies a small area, such as a lift button. It has been suggested that more people read Grade 1 than read Grade 2, especially among people who have lost their vision later in life. However, there is no research available on whether people actually prefer Grade 1 braille on braille and tactile signs. The ABA therefore recommends that such research be conducted as part of more general research into wayfinding.