**Submission  
  
Review of the Disability (Access to Premises – Building) Standards 2010**People With Disabilities (WA) Inc. (PWdWA) would like to thank the Australian Government Department of Industry and Science for the opportunity to provide comment on the Review of the Disability (Access to Premises-Building for the opportunity to provide comment on) Standards 2010. PWdWA is the peak disability consumer organisation representing the rights, needs and equity of all Western Australians with disabilities via individual and systemic advocacy.

PWdWA is run BY and FOR people with disabilities and, as such, strives to be the voice for all people with disabilities in Western Australia.

**President: Greg Madson**

**Executive Director: Samantha Jenkinson**

**People with Disabilities (WA) Inc.**

Oasis Lotteries House, 1/37 Hampden Rd, Nedlands, WA 6009

Email: samantha@pwdwa.org

Tel: (08) 9485 8900

Fax: (08) 9386 1011

TTY: (08) 9386 6451

Country Callers: 1800 193 331

Website: <http://www.pwdwa.org>  
  
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This submission is from People With disabilities (WA) Inc. (PWdWA) in response to the review of the Disability (Access to Premises Buildings) Standards 2010.

**People With Disabilities WA (PWdWA)**

Since 1981 PWdWA has been the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy. We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable.

PWdWA is run by and for people with disabilities and aims to empower the voices of all people with disabilities in Western Australia.

**Introduction**

PWdWA welcomes the opportunity to comment on the review of the Disability (Access to Premises Buildings) Standards 2010. It is encouraging that the review will focus on providing people with disability with dignified, equitable, cost effective access to public buildings and facilities and services within buildings and will identify any necessary amendments to the standards.

In providing this submission PWdWA consulted with members through a combination of social media, group discussions and direct feedback. This submission reflects the views of people with disabilities who are networked with PWdWA. It is vital is that any proposed revisions to the standards are co-designed with people with disabilities. Additionally it is essential that a technical committee comprising of people with disabilities, access auditors and other technical experts be formed to oversee the review process. The Standards are currently not easily accessible as a public document. This makes it very difficult for people to raise a complaint in relation to the Standards if they cannot access them to check non- compliance.

**Recommendations**

* All revisions to Standards must be co-designed with people with disabilities.
* Raise awareness about the existence of the Access to Premises Standards to accommodation operators and their obligations to provide lawful access.
* Operators of premises built pre 2011 be required to upgrade their facilities to comply with the Standards
* Require buildings with multiple tenancies to have one accessible unisex toilet on each floor
* Require all multiple tenancy buildings to have at least one accessible toilet that includes a hoist system and height adjustable change table.
* Increase the ratio of accessible toilet facilities including a hoist system and height adjustable change table in public buildings where a higher number of people with disability frequent such as hospitals and schools.
* The 90th percentile dimension is adopted as the minimum requirement for access for people who use wheelchairs
* Require lifts to use up to date technology such as infra-red sensors which allows operation by proximity movement rather physical activation such as pushing a button
* Require lifts to have braille & audio announcements as well as visual information.
* Removal of the 40 metres exemption criteria for swimming pools
* Review the Standard in relation to accessible parking, and new measures, as identified in the car parking section of this submission be implemented.
* Create a technical committee comprising people with disabilities, access auditors and other technical experts to oversee the review process.
* Ensure the Standards are easily accessible to the public at no cost

**Rental, shared and holiday accommodation**

People with a disability should have the same choice as other members of the community in relation to the type of accommodation they stay in.  
PWdWA believes that where a range of different types of accommodation exists in hotels/motels & resorts e.g. single rooms/family rooms/penthouses, there must be at least one accessible room available in each category.

Holiday accommodation which existed prior to 2011 is not required to comply with the Access to Premises Standards. This situation can cause confusion for both operators and people with disabilities as to what is considered accessible accommodation. Operators may believe their premises are accessible when in fact they don’t conform to the standards. Conversely people with disabilities who have experience of premises meeting the standards may not understand that a premises built prior to 2011 is not required to meet the standards and justifiably expect all premises to comply.

PWdWA recommends consideration be given to a program to raise awareness of accommodation operators about the existence of the Access to Premises Standards and to encourage operators of premises built pre 2011 to upgrade their facilities to comply with the Standards.

**Accessible toilets**

People with disabilities have the same rights as others in society to meaningful employment, to be consumers of goods and services and to access facilities in the community. A barrier to being able to do these things is the lack of, and poorly equipped toilets facilities.

PWdWA believes that buildings with multiple tenancies must be required to have one accessible unisex toilet on each floor. In addition the toilet should be centrally located so that it can be easily accessed from anywhere on that floor with a clear path of access without barriers such as security doors and narrow corridors. PWdWA also strongly advocates that all multiple tenancy buildings have at least one accessible toilet that includes a hoist system and height adjustable change table.

The location of toilets should be clearly signed throughout the building and have clearly identifiable signage. It is PWdWA’s view that where there are toilet facilities in buildings such as shops, cafés and restaurants, toilet facilities for people with disabilities are also included. PWdWA recommends that there is a higher ratio of accessible toilet facilities including a hoist system and height adjustable change table in public buildings where people with disabilities visit more frequently such as schools and hospitals. The standard should be revised with an acceptable toilet/visitor ratio.

**Wheelchair access**

People with disabilities regularly encounter barriers that impact on their ability to interact with the broader community and be meaningful contributors to society. One of the most common barriers encountered by wheelchair and mobility aid users is around access to the built environment. The research into wheelchair spatial dimensions which was completed in February 2015 found that the majority of spatial requirements in the Premises Standards and referenced Australian Standards remain appropriate, however PWdWA strongly recommends that 90th percentile dimension be adopted as the minimum requirement for access.

**Lifts**

Some types of passenger lifts are difficult for people to use. For example, some lifts have buttons that you have to hold down to make them move, some lifts need a key to make them move. These types of features are often used in open lifts, like the ones used on stairways.

The standards must incorporate as a minimum standard that lifts do not have a button requiring hold down or a key. People with fine motor skill difficulties and limited dexterity find it extremely difficult to access lifts with the use of a key. Automatic opening doors must also be a minimum standard. Lifts with buttons that have to be constantly held to make them move impact on the independence of people with disabilities as this is difficult to operate. Technology such as infra-red sensors that allow someone to operate a lift by proximity movement rather than having to push a button should be encouraged.

Braille & Audio announcements as well as visual information should also be encouraged when designing or improving lift facilities. It is a reality that higher density development is occurring incorporating both residential and commercial buildings. It is therefore essential that all new developments include fire-rated lifts to allow people with disability safe, independent and dignified egress in an emergency situation.

**Swimming pools**

Consideration is given to removing the 40 metres criteria. Spas, hydrotherapy and paddle pools are often utilized by people with disabilities for therapy and rehabilitation purposes. These kinds of facilities often have an outside border of less than 40 metres and consequently people with disabilities whose quality of life could be improved by being able to access are excluded.

Innovative design and planning of swimming pool facilities should be encouraged to incorporate access for people with disabilities. While ramp access to pools offers the most independence and dignity for people with disabilities, beach wheelchairs and handrails add to accessibility options for people with disabilities. For facilities such as spas and situations where space is limited and these options are not physically possible, installation of mechanical hoists should be considered although this method reduces the independence of the individual and is less dignified.

**Carparks**

PWdWA considers that levels of existing accessible parking are not meeting the needs of the community, both in terms of the availability and the design of parking bays. An aging population is putting increasing demand for and pressure on existing accessible parking as more people become eligible to use accessible parking facilities. This problem is made more acute at premises such as hospitals, medical centres and areas that attract large volumes of people. PWdWA considers that all carparks, both public and private must haveaccessible parking and that there is consistency across all carparks in relation to the location and orientation of accessible parking bays. Parking facilities that have paid parking must ensure people with disabilities can independently and safely access parking meters or machines.

PWdWA is concerned that the current Standard for accessible parking bays does not meet the needs of many people with a disability. PWdWA recommends the Standard in relation to accessible parking be reviewed and consideration be given to addressing a number of issues.

1. That there are specific bays allocated for larger vehicles such as buses.

2. That accessible parking bays are large enough, especially in length to accommodate vans where wheelchair users can exit the rear of the van safely and are not exiting into the flow of traffic.

3. Users of accessible parking bays are both passengers and drivers of vehicles and accessible parking bays are large enough so that wheelchair users are able to exit both side of a vehicle safely without restrictions.

4. That the clearance height of undercover and multi-level carparks be increased to allow sufficient space for higher vehicles and vehicles with roof-mounted wheelchair carries to enter, unload and exit the carpark without difficulty.

**Public transport buildings**PWdWA recommends that all major Public Transport buildings and hubs have public toilets including accessible toilets the same as other public buildings. Consideration should be given to a requirement of the standards being that public transport buildings provide a range of access options for people with disabilities such as lifts, ramps & escalators. Access points such as lifts and escalators should be centrally located have independent power supplies. Where there is more than one lift and escalator, they should be able to operate independently in the event that one is out of service. In addition to lifts and escalators at Public Transport buildings, PWdWA believes that ramps should be available at all times as means of independent access and an alternative in the event of total power failure or an emergency situation requiring evacuation.

**Conclusion**

PWdWA strongly urges that the recommendations put forward in this submission are carefully considered and actioned. An important step to ensure standards are enforced is to align actions contained in public authority Disability Action and Inclusion Plans with the Standards. This would not only greatly improve compliance but also raise awareness and knowledge of the Standards.