

SUBMISSION ON PREMISES STANDARDS REVIEW CONSULTATION PAPER



Australian Government Department of Industry, Science
Energy and Resources

PremisesStandards@industry.gov.au



Australian
Institute of
Architects

Submission issued May 2021

2020 Review of the Disability (Access to Premises - Building)
Standards 2010 (Premises Standards)

ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) in response to the Australian Government Department of Industry, Science, Energy and Resources on the 2020 Review of the Disability (Access to Premises - Building) Standards 2010 (Premises Standards).
- At the time of this submission the National President is Alice Hampson FRAIA.
- The Chief Executive Officer is Julia Cambage.
- The Institute acknowledges the valued work and expert contributions, of those members who comprise our National Access Working Group, that has enabled this submission to be prepared.

CONTACT DETAILS

Australian Institute of Architects
ABN 72 000 023 012
2A Mugga Way Red Hill ACT 2603 +61 2 6208 2100
+61 2 6208 2100
policy@architecture.com.au

Contact

Name: Paul Zanatta | Advocacy and Policy Manager
Email: paul.zanatta@architecture.com.au

TABLE OF CONTENTS

1	INTRODUCTION.....	3
2	DETAIL OF ISSUES AND SOLUTIONS FOR KEY THEMES.....	4
2.1	Access and Egress.....	4
2.1.1	Accommodation	4
2.1.2	Existing buildings	5
2.1.3	Alignment of Premises Standards, NCC and Standards Australia documents	5
2.1.4	Scooters	6
2.2	Communication and Wayfinding.....	6
2.2.1	Inclusions and coverage	6
2.2.2	Specific concerns in buildings.	6
2.2.3	Wayfinding Technology is absent from the Standard.	7
2.2.4	Emergency egress stairs	8
2.3	Toilets and change provisions.....	8
2.3.1	The toilet concession	8
2.3.2	Scope of inclusion	8
2.4	Other.....	8
2.4.1	The broad range of disabilities	8
2.4.2	Education	9
2.4.3	Access board or similar	9
2.4.4	NCC/standards Australia/Premises Standards queries	10
2.4.5	AS 1428.2 :1992 Design and mobility. Part 2: Enhanced and additional requirements – buildings and facilities	11
2.4.6	Standardised implementation across States and Territories	11
2.4.7	Access to Premises Guide	12
2.4.8	Clear purpose on standards details	12
2.4.9	Access to documents	13
2.4.10	Premises Standards Scope	13
2.4.11	Performance solutions	14
2.4.12	Evacuation in Lifts	14

1 INTRODUCTION

The Australian Institute of Architects (the Institute) is the peak body for the architectural profession in Australia, representing around 12,000 members. The Institute works to improve our built environment by promoting quality, responsible, sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology. By combining creative design with technical knowledge, architects create the physical environment in which people live, which in turn, influences quality of life. Through its members, the Institute plays a major role in shaping Australia's future.

Architects are a key component of Australia's \$100 billion built environment sector and there are around 13,500 architectural businesses in Australia with around 40,000 employees. Approximately 25,000 people in the labour force hold architectural qualifications (bachelor's degree or higher) and architectural services in Australia in 2017-18 had revenue of \$6.1 billion and generated \$1.1 billion of profit¹

Australian architects have a worldwide reputation for creative and innovative design leadership and Australia is known for producing contemporary and breakthrough architecture. We have a well-recognised, high quality and liveable built environment. To maintain this into the future and support our burgeoning population in both urban and regional centres, we must create buildings and public spaces that are environmentally, sustainable and accessible to all.

In the spirit of "building back better" approach, as governments across Australia seek to either rebuild natural disaster ravaged communities or create economic stimulus through capital expenditure on various built environment projects, there is an opportunity to ensure premises access is also inherently featured in designs. The Institute, therefore, welcomes the opportunity to make a submission to this consultation on the 2020 Review of the Disability (Access to Premises - Building) Standards 2010 (Premises Standards).

The Institute has also recently taken the opportunity to respond to the Department of Infrastructure, Transport, Regional Development and Communications' consultation in its review of the National Cities Performance Framework (NCPF). In our submission², the Institute pointed out that there is a glaring gap in the current Liveability measures of the NCPF with the absence of measures of accessibility of our cities for people living with disabilities. We recommended that there needs to be more than one measure of accessibility for people living with disabilities under the current theme of Liveability or a new theme that we proposed for the NCPF of Inclusion and Health.

¹ Industry Profile: Architectural Services in Australia, IBISWorld April 2019

² https://www.architecture.com.au/wp-content/uploads/Australian-Institute-of-Architects-Submission-to-DITRDC-on-NCPF_FINAL_February_2021.pdf

About this submission

While the current premises Standards have improved accessibility for people with disabilities, the current Standards focus mainly on what is required to ensure that people with physical disabilities can more easily access social gatherings, places where goods and services are provided, employment, health care, education and participate in recreational activities. There is now an opportunity for future reviews and updates of the Premises Standards to incorporate requirements that will extend this access to people with disabilities other than physical disabilities. This includes people who are blind or have no vision, have a hearing impairment or a cognitive impairment, people on the Autism spectrum or people with chemical sensitivities.

Increased dissemination of knowledge to, and education for design professionals, builders and building owners and developers in relation to the user requirements for accessible environments would increase the consistency in built outcomes across Australia.

The objectives of the submission are to:

- highlight concerns that have been identified during the period of the current Premises Standards and propose possible solutions
- highlight additional areas that could be considered to be included in the next revision of the Premises Standards, which would improve the opportunities for people with various disabilities to access a variety of building types
- seek clarification of all the concerns raised in the submission, as this clarification would assist architects and other design and access consulting professionals to deliver buildings that were more compliant and suitable for people with disabilities

The detailed part of our submission identifies issues in relation to relevant themes amongst the seven themes identified in the consultation paper and proposes solutions for these issues.

2 DETAIL OF ISSUES AND SOLUTIONS FOR KEY THEMES

2.1 Access and Egress

2.1.1 Accommodation

Issues

The current threshold for short stay accommodation in Class 1b buildings (i.e. stayz, Air B&B) has the unintended consequence that many people with disabilities cannot access accommodation.

Internal spaces and the design within Class 3 hotel and motel rooms can also compromise people's independence, including the presence of support workers. This can mean insufficient space is provided to allow for two king-single beds (one for a support worker or partner), the location of general power outlets is out of reach, vanity units are often removed and a single basin with no shelf space is instead provided and the poorly located placement and design of suit case racks and wardrobes means they cannot be used.

Solutions

A higher ratio for accessible accommodation provisioning unit of 1 in 3 units above the current 1 in 4 ratio would increase the overall availability of accommodation for people with disabilities.

A minimum provision should be made for two king-single beds and attention paid to the location and design of fixtures and fittings.

Design items for hotel and motel rooms are being included within the proposed new standard AS 1428.6 Design and mobility: Part 6 Fittings and Fixtures, which is being currently finalised. This could be referenced in the Premises Standards.

2.1.2 Existing buildings

Issues

The rate at which provision of accessibility for existing buildings across the country is occurring is slow. The triggers for upgrading existing buildings are complex and contribute to the slow pace of upgrade of accessibility within existing buildings.

A further issue for existing buildings is that people with disabilities do not know in advance whether the building is suitable for their use.

Solutions

A central register of accessibility within buildings could be developed so that people with disabilities could determine in advance if a building was suitable for them (refer 2.4.3 below)

In the Institute's 2021 Federal Budget Submission³, our Recommendation 6.4 to the Australian Government is that following the review of the Disability (Access to Premises – Buildings) Standards 2010, that Government should investigate the options for subsidy or incentive programs to enable all public and certain classes of private existing buildings to be retrofitted to meet the revised standards.

2.1.3 Alignment of Premises Standards, National Construction Code and Standards Australia documents

Issues

Due to misaligned publication dates, it has been identified that there is a lack of alignment of Premises Standards, National Construction Code (NCC) and Australian Standards. This results in confusion, misunderstandings and in some instances, outdated requirements being included in buildings or different outcomes being delivered in buildings for the same situation, solely due to the misalignment of requirements between the three documents.

Solution

Regular alignment of publication of NCC, Premises Standards and Australian Standards is required to ensure consistent built outcomes for people with disabilities.

³ https://www.architecture.com.au/wp-content/uploads/Institute-of-Architects-2021-Federal-Pre-budget-submission_VFINAL_20210129B.pdf

2.1.4 Scooters

Issues

The use of scooters for mobility is increasing but scooters are not considered in the current Premises Standards, the NCC or Australian Standards – Access for Mobility Standards. This is primarily due to the wide range of dimensions of scooters and that the spatial requirements to enable many scooters to enter buildings would have a significant impact on building design. There is also a lack of research into the prevalence of scooter use including whether all users need to always use their scooters within buildings. An example is users with a chronic health condition who use their scooter for larger outdoor distances but do not require a scooter indoors.

Solution

Research needs to be undertaken to determine the degree to which scooter users require their scooters to enter public buildings. If it is determined that provision needs to be made for scooters in public buildings, the government needs to work with Standards Australia to develop a new standard to cover the needs of scooter users (refer 2.4.3 below).

2.2 Communication and Wayfinding

2.2.1 Inclusions and coverage

Issue

The Standards Australia MEO64 committee worked for some years on the development of a wayfinding standard. While a standard has been published, there were limitations on what could be included in the normative section. This was primarily because not all elements could be located consistently in the built environment and were therefore difficult for a certifier to sign off. Inconsistent locations would also make it difficult for people who are blind or have no vision to discover wayfinding features.

Solution

Continued work is required to determine a process that would enable a greater level of wayfinding to be incorporated into buildings in a manner that would be usable by people who are blind or have no vision.

2.2.2 Specific concerns in buildings.

Issue(s)

Situations that have been highlighted as concerning to people who are blind or have no vision are areas of a building that contain:

1. extensive glazing with insufficient contrasting strips (i.e. often the horizontal contrasting strips are insufficient if the horizontal strips continue through glazed doors – with no other identification of where the door(s) are located within the glazing)
2. situations with extensive glare
3. a lack of means for self-navigating through the building can contribute to navigational difficulties for people who are blind or have no vision. This particularly relates to the need for relevant and regular provision and placement of signage and information

4. insufficient text size, proportionate to the distance from which text is intended to be read
5. text fonts, such as fonts with serifs, that lead to difficulties in visual discrimination between certain letters, numerals or characters
6. luminance contrast between any text and its background

Solutions

Further research should be carried out, or appropriate already published peer-reviewed research should be used, to provide an evidence-base for recommendations that are incorporated into the Premises Standards, the National Construction Code and Standards Australia documents.

Research should also include needs evaluation research to better understand the concerns of people who are blind or have no vision that develop as a result of unintended situations.

Research findings and recommendations should also form the basis for further education of:

- building design and access consulting professionals
- builders
- building owners and managers

With government support, some of these elements could be incorporated into an extension of the current AS 1428.4.2 Design and Mobility. Part 4.2: Means to assist the orientation of people with vision impairment – wayfinding signs.

2.2.3 Wayfinding Technology is absent from the Standard.

Issue

Because technology changes regularly, technology relating to wayfinding has not been incorporated into the Australian Standards. This was an active decision to enable technology to develop without being limited by a Standard.

Because there is no specific standard, there are a number of different systems now on the market (blind square, blindmaps etc) which each have a different device software application ('app') that the user has to download to gain access to particular premises.

Solution

Further work is required to consult with people who are blind or have no vision around the use of wayfinding apps in public spaces and whether a central location for holding information about different apps available at different sites would be helpful (refer 2.4.3 below)

The usefulness and feasibility of developing a common interoperability standard for these wayfinding applications should be explored with the vendors and their communities of users so that users would not need to download multiple applications.

2.2.4 Emergency egress stairs

Issues

1. Emergency egress stairs are currently only required to have a handrail on one side (left hand side while egressing). This severely hinders the ability for building users who can only use the right side of their body, to egress a building safely.
2. At the same time there is no requirement for tactile signage within fire stairs to enable building users who are blind or have no vision to identify where they are within a building when they are egressing in an emergency.

Solutions

1. It is recommended that, as is in some European countries, handrails are provided on both sides of emergency egress stairwells.
2. It is recommended that tactile signage be provided on the handrails in egress stairs indicating each floor level and the direction of egress.

2.3 Toilets and change provisions

2.3.1 The toilet concession

Issue

A toilet concession remains incorporated into the current Premises Standards.

Solution

It is recommended that this be removed in the next review with period of notice supported by an industry communication strategy.

2.3.2 Scope of inclusion

Issue

The scope of inclusion for adult change facilities is limited and does not currently include university campuses or TAFE campuses.

Solution

Research the need for adult change facilities at university and TAFE campuses and the required scope of amendments to inclusions to address this need.

2.4 Other

2.4.1 The broad range of disabilities

Issue

The main focus of the first Premises Standards was to ensure access into buildings for people with physical disabilities. It has been observed that the Premises Standard should be extended to include people with other disabilities including those who are blind or have no vision, who have a hearing impairment or a cognitive impairment, people on the Autism spectrum and people with chemical sensitivities.

Solution

It is recommended that more research is undertaken into the needs of people with a wider range of disabilities to understand their needs in accessing the built environment and that this research is used to develop the next or subsequent Premises Standards.

2.4.2 Education

Issues

1. A lack of education and subsequent understanding of the practical applications behind dimensions in the standards leads to non-compliance in design, construction and even use of spaces (e.g. accessible bathrooms being used as storage areas).
2. Not everyone is aware that compliance with the access requirements in the NCC does not mean that their building complies with the Premises Standards.

Solution

1. Education of building professionals and building owners in relation to the practical needs of people with disabilities and how decisions to alter required dimensions within the design or building phase can inadvertently cause discrimination by precluding use of the building/area by the intended people with disabilities. Objectives of education should include:
 - a) improved skills development and knowledge
 - b) more thorough and consistent documentation by consultants such as Architects, Design Practitioners and Access Consultants
 - c) greater consistency in building practice and subsequent built outcomes by builders across all states and territories.
 - d) less inappropriate use of areas such as accessible bathrooms for storage by building owners
2. Improve education of consultants, builders and building owners around the relationship between the Premises Standards, the National Construction Code and the Australian Standards and each party's responsibilities.

2.4.3 Access board or similar

Issues

1. While peak bodies are represented during standards development, more information of lived experiences of people with disabilities in using buildings is desirable as they would inform future standards and enable more problems to be accurately addressed.
2. People with disabilities may experience difficulties with technical literacy, knowledge or confidence to read and understand plans or describe concerns that they have.
3. Some people with disabilities may not raise concerns about specific premises because they either don't know how to do this, or they may not want to make a formal complaint involving a potentially adversarial process.
4. Outside of raising a complaint, there is no process by which building users can check whether a situation is compliant or non-compliant.
5. There is no process for raising concerns about an intended development before it is complete. If there was an ability to have a discussion, then there is an opportunity for money to be saved and the building to be built correctly.
6. The public are not generally aware of the nature of complaints made to the Australian Human Rights Commission as many of the complaints are resolved through mediation and the outcomes may be confidential.
7. Standards Australia does not fund research and relies on input from committee member experts and other published data. While other organisations such as the ABCB and industry groups do fund research, the research is for their own purposes and not automatically made available to Standards Australia. The result is that

research has been undertaken with people with disabilities, but the research cannot be necessarily utilised in the development of Australian Standards.

Solutions

It is recommended that a government funded body (similar to the U.S. Access Board⁴ or the Centre for Excellence in Universal Design in Ireland⁵) be set up specifically to:

1. Collect research data across Australia on the effectiveness of the Premises Standards in providing equitable access to buildings.
2. Commission and collect data from people with disabilities which could then be used to inform the NCC, the Premises Standards and development of accessible standards by Standards Australia. An example of data that could be collected is the collection of data on the real demand for accessible parking across all states and territories to inform the accessible parking space ratios in the NCC.
3. Operate a helpline which could provide advice as a first 'stop' where people could inquire whether a situation that they have encountered is compliant (i.e. ask "is it supposed to be like this"?) and provide advice on how to proceed with a complaint if the situation was non-compliant.
4. Deliver a service whereby people with disabilities would have the opportunity to provide input into new designs before they were built. Designers /developers and owners could also have the opportunity to review their designs with a user group that could include a broad range of people with disabilities and seek input into the development at the design phase.
5. Collect user experiences and concerns and pass this information on so that it can inform priorities for future Premises Standards, National Construction Code and Standards Australia publications.
6. Educate the public about the number and types of complaints and outcomes and the fact that people do make complaints, a summary in plain English on the Australian Human Rights Commission (AHRC) website would be helpful.
7. Conduct further research into the needs of people who are blind or have no vision (refer to previous comments).
8. Conduct further research into the needs of people who use scooters for mobility (refer to previous comments).
9. Maintain a central building register (refer to previous comments).

2.4.4 NCC/standards Australia/Premises Standards queries

Issues

There is currently a lack of clarity on the use and assessment of Clause D3.4 Exemptions. This includes a lack of clarity as to:

- who qualifies as an appropriate expert to assess that D3.4(a) access is inappropriate for people with disability and (b) the health and safety risk for people with a disability
- the method and criteria by which a certifier assesses these issues

⁴ <https://www.access-board.gov/>

⁵ <http://universaldesign.ie/>

- whether an Occupational Health and Safety (OH&S) assessment is required or the assessment of an Occupational Therapist

This clause is currently open to misinterpretation and assessors are falling back on pre-conceived ideas about what people with disability can or cannot do. Where an area may be inappropriate for someone with a physical disability, it may be accessible for someone who is blind or has no vision or vice versa.

As currently written, it seems that the accessibility requirements of people with a wide range of abilities are all assessed together. However, the guideline to the Premises Standards warns about preconceptions, advising that building surveyors need to document their decisions using all information available.

Solutions

1. Improved clarity and provide guidance materials for the use of Clause D3.4.
2. Consider partial exemptions.
3. Reference sections of the (under development) AS 1428.6 Design and mobility. Part 6: Fittings and Fixtures standard instead of AS 1428.2:1992 Design and mobility. Part 2: Enhanced and additional requirements – buildings and facilities.

2.4.5 AS 1428.2:1992 Design and mobility. Part 2: Enhanced and additional requirements – buildings and facilities.

Issues

The Premises Standards references AS 1428.2:1992 Design and mobility. Part 2: Enhanced and additional requirements – buildings and facilities in clauses H2.2, H2.3, H2.4, H2.5, H2.7, H2.10, H2.11, H2.12, H2.13& H2.14. A large portion of AS 1428.2:1992 Design and mobility. Part 2: Enhanced and additional requirements – buildings and facilities has been superseded by AS 1428.1. There are conflicting dimensions between the two standards.

Solutions

Refer to updated or in development Australian Standards

2.4.6 Standardised implementation across States and Territories

Issue

Because each state has its own building regulation and the protocol was written to advise the states on how to implement the Premises Standards into the state building legislation, there is a lack of standardised implementation of the Premises Standards including elements such as resolution of unjustifiable hardship claims across states and territories. This is a challenge because there is no consistent pathway for practitioners or individuals to dispute resolutions. It also precludes consistent education across the country in relation to the implementation of the Premises Standards.

Solution

Implementation of Access Panels, such as in Victoria, where these matters can be heard and formally determined with a view to national dialogue on recurrent issues to ensure that determinations are consistent.

An ability to be able to ‘comply’ with the Premise Standards throughout Australia is desirable.

2.4.7 Access to Premises Guide

Issue

The access to premises guideline⁶ has been helpful but it was developed some years ago.

There has been feedback that many people with disabilities and others find the contents of the Premises Standards too technical, with a large proportion of the population unable to either understand or visualise the intent of the diagrams and dimensions.

This leads to a lack of understanding of whether a situation is compliant or non-compliant with the Premises Standards/NCC/AS standards.

Solution

Update the Guideline on the Application of the Premises Standards and:

- include explanations and diagrams in Easy English format so that people with disabilities can understand their rights and others can understand what is required to be provided
- align information being provided with the Premises Standards to easily enable cross reference between the two documents
- include examples of how to deal with “difficult situations”
- provide downloadable simplified diagrams /photographs of compliant common items/situations such as thresholds, ramps and accessible bathrooms

2.4.8 Clear purpose on standards details

Issue

There has been repeated advice that people don't understand the "why" or the background of some of the detail within the Premises Standards (i.e. why does a toilet have to be set out to certain dimension?) This creates a risk of misinterpretation.

Solutions

- Develop a publication which explains why locating building elements in consistent locations, as included in the Premises Standards, is important for building users. This information would be used to inform designers and builders and inform certifiers and access consultants when performance solutions are sought.
- It is also recommended that the National Construction Code include access related performance solutions in its “limitations” section. This would reduce instances where performance solutions are agreed by parties who have no understanding of what should be considered in a particular performance solution.

⁶ Australian Human Rights Commission. [Guideline on the Application of the Premises Standards Version 2 February 2013](https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards) See; <https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>

2.4.9 Access to documents

Issues

Access to Australian Standards documents is currently only via user pays. This is seen by many people as a disadvantage and barrier to the provision of improved accessible built outcomes.

There are also many further Australian Standards that are available which are not currently referenced by the Premises Standards. However, these cover aspects of design which, if incorporated into designs, would enhance the buildings for people with specific disabilities. Examples include design for wayfinding and hearing impairment.

Solutions

Provision of free access to the AS 1428 series of standards to increase awareness and knowledge of the Standard, could help bring about increased proportion of buildings that provided a higher than minimum level of accessibility for people with non-mobility related disabilities.

2.4.10 Premises Standards Scope

Issues

1. The current NCC and Australian Standards currently reflect a 2009 view of what is considered to be the minimum requirements (mostly for people with mobility impairments).
2. A decision was made prior to the development and publication of the current Access to Premise Standards that the scope would not cover anything not covered by the NCC. This has led to a lack of clarity around compliance of building fit out elements such as reception counters, tea points and other similar built-in items.

The consensus process for development of Australian standards means that the result does not necessarily reflect an outcome that solely addresses a Human Rights perspective. This is due to a wide range of interests among members of the Expert Advisory Committee.

Solutions

1. Maintain the Expert Advisory Committee as a body where high-level conversations and potential policy for increasing the scope of the Premises Standards, the NCC and Australian Standards can be held. Provide guidance on any recommendations that come out of the second review and discuss with representatives from all stakeholder groups. Source expertise and knowledge from various interests of disability, industry, design. Include meaningful input from people with disabilities into the future Premises Standards.
2. As the Premises Standards is a human rights document, it would be preferable if the Attorney General's Department and the Department of Industry, Science, Energy and Resources:
 - led the discussions and investigations with organisations representing people with a wide range of disabilities with a view towards broadening the scope of accessibility covered in the Premises standards to cover a broader range of disabilities.

- agreed on any scope changes based upon the positive impact on people with disabilities and the importance of People With Disabilities (PWD) being able to access workplaces, accommodation and places or leisure and then directed the NCC and Standards Australia to write the technical requirements.
- Referenced sections of the (currently under development) AS 1428.6 Design and Mobility. Part 6 Fittings and Fixtures standard which will include accessible requirements for these and other fit-out elements.

2.4.11 Performance solutions

Issues

The current system enables Access Consultant / expert opinion shopping by some with a view to obtaining sign-off for non-compliances without going through a proper process (whether via Performance Solution or application to an Access Board). There is currently nothing to stop this and once a consultant indicates that they will not approve something, they lose the commission. This is a systemic problem which weakens the application of the Premises Standards and in some instances leads to outcomes being built that are not usable by the intended parties.

Solutions

1. It is recommended that the current situation applied to Building Certifiers be adopted – whereby once an accredited Access Consultant is appointed for a project, the client is unable to seek alternative consultants' solutions.
2. Improve education of Certifiers on the application of the Premises Standards to avoid acceptance of solutions which should have a Performance Solution or an application to the Building Authority Access Panel (depending on how the Protocol is implemented in the States and Territories) for approval. Strengthen the definition of what should be referred to the Access Panel.
3. Some guidance on issues to consider and input from people with disabilities into this guidance material, for particular performance solutions would lead to more consistency in outcome. The Access Consultant should already have the expertise to formulate a considered performance solution.

2.4.12 Evacuation in Lifts

Issue

There are currently no Australian Standards dedicated to evacuation in lifts. Standards would be useful in multi-level office and residential accommodation. The importance of people with disabilities being able to use lifts in an emergency in residential accommodation has become urgent with the increase in accessible accommodation in apartments associated with NDIS funding.

Solution

It is recommended that ISO/TS 18870:2014 *Lifts (elevators) – Requirements for lifts used to assist in building evacuation*⁷ be reviewed with a view to incorporation into Australian

⁷ <https://www.iso.org/standard/63641.html>

legislation. Involvement of people with disabilities with particularly mobility, vision and hearing impairments in any discussion relating to lift legislation is important. Inclusion of audio-visual alarms should be considered – especially within the ever increasingly popular destination control lifts.
