deafness forum of australia

# POSITION STATEMENT

# TITLE: COMMUNICATION ACCESS – SECURE FACILITIES

## ISSUE:

Many office buildings, apartments, carparks and similar facilities (e.g. lifts) provide locked doors with an intercom or telephone as the means of contacting someone and the process of gaining entrance. These situations include secure enclosures used by guards or security officials.

The Disability Discrimination Act makes it clear that all people who are Deaf or have a hearing impairment have the same right to enter secure facilities as do people with hearing. Failure to provide equitable entry arrangements to such facilities means the person who is Deaf or has a hearing impairment is discriminated against. It is illegal to discriminate against people on the basis of their hearing/deafness disability. If there are legislative provisions to provide particular facilities, then those facilities must be accessible to all. The Building Code of Australia and various Australian Standards indicate the specific obligations in respect of various types of buildings and transport systems. Where there are no specific other legislative provisions, the DDA still applies and makes it illegal to discriminate against people with hearing/deafness disabilities on the basis of that disability.

It is possible to provide communication access through the provision of the right equipment. For example, it is possible to purchase teletext-enabled TV sets so that captions may be displayed. It is possible to purchase telephones with text display, volume control, ring flasher for incoming calls, amplifiers and hearing aid coupler. A range of affordable solutions exists. There is no valid reason why building operators cannot provide adequate communication access for all users who need it.

If a secure facility provides a telephone or intercom system as the means of contacting someone to gain entrance, then those facilities must be accessible to all people regardless of their hearing. Unless it has a captioned display, an intercom system should not be used for visitors to gain entry to any secured area.

## POSITION:

That, regardless of whether or not there are particular legislative requirements:

1. All secure facilities should provide communication access facilities where necessary to enable all deaf and hearing impaired users to gain entrance.
    - Access to captioning on intercoms, telephones, or television or video display sets.
    - Functioning assistive listening systems (ALS), such as Induction loop (IL),

Frequency Modulated (FM), or Infrared (IR) systems, to enable all participants who need ALS to clearly hear the information without reverberation or background noise.

- Voice telephones with:
  - (a) Built in or clip on amplifiers (minimum of 20dB gain compared to a standard telephone as defined by Telecommunications (legislation);
  - (b) Telecoil couplers (minimum field strength of 100mA/m); and
  - (c) Flashing lights, captions or text message to alert the user to the fact that the voice telephone or intercom is responding.
- Text facility using Baudot 50 (such as TTYs) compatible with TTYs complying with EIA/TIA-825, and compatible with the National Relay Service. In addition, flashing lights shall be provided to alert the user to the fact that the text telephone is ringing.

2. All building owners and operators should implement:
   - Ongoing maintenance and checking of all communication access equipment and procedures.
   - Ongoing training of staff regarding correct use of facilities.
   - Promote (including signage) the existence of installed communication access facilities.
   - Use the International Symbol for Deafness to identify:
     - The existence of hearing (communication) access.
     - The type of system available.
     - The areas covered by the system.

Explanations

1. People with telecoils in their hearing aids need telecoil couplers for telephone access. They are built in to some telephones. Many phones that are fitted with telecoils are of insufficient strength.
2. People without telecoils in their hearing aids (or without hearing aids at all) need built-in or clip-on amplifiers for telephone access.
3. Adequate volume control for the majority of hearing impaired people is 20dB gain compared to a standard telephone as defined by Telecommunications legislation.
4. Telephones with 20dB gain usually have built-in telecoils of sufficient strength, and do not require clip-on amplifiers or clip-on telecoil couplers.
5. A significant number of hearing-impaired people wear hearing aids but cannot benefit from the hearing aid coupler. Therefore, captioning or text display must be provided.
6. Wherever flashing lights are used to alert people they must be visible from the area near the telephone/intercom facility.

## COSTS OF POSITION

The cost of implementing this position statement is considered to be small.

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## RESEARCH BASIS

The availability of the range of communication access facilities referred to in the position statement is known.

**APPROVED:** Board - 14 September 2004.

**REVIEWED:** CEO - November 2004, Board - March 2005.

**DATE OF NEXT SCHEDULED REVIEW:** No further review yet scheduled.