

DEPARTMENT OF INFRASTRUCTURE, TRANSPORT, REGIONAL DEVELOPMENT AND
COMMUNICATION

Reform of the Disability Standards for Accessible Public Transport: Consultation Regulation Impact Statement

May 2021



Introduction

Being able to access buildings and facilities is one thing. Being able to travel there comfortably, is another.

Access to fully accessible bathrooms is a fundamental human right. Everyone should have the right to access a clean, safe and private place to go to the toilet. Changing Places allow people with disability – and their friends, families and carers – the opportunity to leave the house without worrying about when they'll be able to use a toilet. To fully enjoy and engage with their community, just like anyone else.

Changing Places are the answer. Changing Places facilities provide accessible bathroom facilities for people whose high support needs mean they cannot access standard accessible toilets. They are larger than standard accessible toilets and have extra features such as a height adjustable adult change table, a tracking hoist system and room for two people either side of a peninsula toilet. Changing Places were designed to meet the needs of people with high support needs and their carers. They are an internationally recognised facility, which started in the UK in 2006 and are now in countries all over the world – including Australia, Ireland, Scotland, New Zealand, Canada and the United States.

Whilst access is critical, a significant issue is getting as many Changing Places across metropolitan and regional transport hubs in Australia. [A conservatively estimated 1.4 million Australians](#) with profound and severe disability would benefit greatly from the creation of more Changing Places in Australia.

For this community, the lack of Changing Places is locking them out of huge parts of society. To ensure the Disability Standards for Accessible Public Transport is working for every Australian, appropriate bathroom facilities are vital. For universal access to become the standard, **Changing Places should be made available everywhere public toilets are found at premium or major train stations, public transport stations and hubs, airports and road transport/service station stops.**

Think HQ has been contracted by the Department of Families, Fairness and Housing to manage the Changing Places initiative. It's in that capacity that we are making this submission – and we'd like to thank you for the opportunity. It's our responsibility to promote Changing Places and increase the number across Australia – so ensuring Changing Places are a part of accessible standards is vital. So far, there are 171 Changing Places in Australia – we hope to increase that to at least 600 in the next two years. To do that, we need to embed Changing Places within Australian standards – like having them included in the Disability Standards for Accessible Public Transport to expand the type of buildings where Changing Places must be included.

Building Changing Places isn't about building a toilet. Bella, best friend of Changing Places user Briana, put it simply:

"You're not just building a toilet. You're changing people's lives by doing this – and not just the person with a disability, but their families, friends and people caring for them."

The Changing Places initiative aligns to the Victorian Government's absolutely everyone State Disability Plan 2017-2020 with one of the priorities being Universal Design. The government is committed to implementing the Universal Design approach by making the built environment, government, programs and policies usable for as many people as possible. This includes a commitment to building Changing Places.

Changing Places in Australia

Changing Places have been adopted nationally and there is strong support from all over Australia.

The Changing Places concept was first introduced into Australia in 2011 when Maroondah City Council contacted the UK Changing Places consortium and sought permission to use the Changing Places branding and logo. The

first Australian Information kit with Changing Places design specification was released in 2013. These specifications were based on the UK design but also incorporated Australian Standards.

The first Changing Places built to Changing Places specifications opened in Australia at Ringwood Lake, Melbourne in 2014. Since then, we have made good progress and as at May 2021 there are **171** Changing places across Australia, with the majority in Victoria. Only a handful of these Changing Places are located in proximity to public transport stations, hubs or interchanges.

Table 1 Number of Changing Places in Australia May 2021

State or Territory	Number of Changing Places Facilities
Australian Capital Territory	1
New South Wales	24
Northern Territory	0
Queensland	16
South Australia	1
Tasmania	2
Western Australia	34
Victoria	83

Source: Changing Places website find a toilet <https://changingplaces.org.au/>

The Changing Places design specifications have undergone a number of revisions, based on feedback from Changing Places users and facility owners with the most recent release being the *Changing Places Design Specifications 2020* available at: <https://changingplaces.org.au/>

In 2015, there was significant community input into the Australian Government's review of the Premises Standards (2010) requesting that Changing Places being incorporated into the Building Code of Australia.

Later that same year the Building Ministers' Forum released the following communique: *Ministers noted the initiatives being implemented by jurisdictions in providing accessible adult sanitary facilities in public buildings and noted that the Review of the Disability (Access to Premises – Buildings) Standards 2010 received a large number of submissions in respect of this initiative.*

In 2019, Australia became the first country in the world to include the Changing Places design in its National Construction Code. The Australian Building Codes Board updated the National Construction Code in 2019 (BCA Volume One, Clause F2.9) to include a new type of toilet called 'Accessible Adult Change Facilities'. This new type of toilet – based on the Changing Places design – must be included in certain classes of public buildings. From 1 May 2019, one unisex Accessible Adult Change Facility must be provided in:

- Class 6 buildings: shopping centres – with a design occupancy of not less than 3,500 people.

- Class 9b sports venues – with a design occupancy of not less than 35,000 spectators or contains a swimming pool that has a perimeter of not less than 70 m.
- Museum and art gallery (or similar) buildings – with a design occupancy of not less than 1,500 patrons.
- Theatre and entertainment venues – having a design occupancy of not less than 1,500 patrons.
- Domestic and international passenger airports.

The National Construction Code does not require that Accessible Adult Change Facilities be accredited as Changing Places toilets. However, toilets built according to the Changing Places design standards will generally meet the Deemed-to-Satisfy Provisions of the National Construction Code.

Changing Places at public transport locations

The inclusion of Airport terminals in the National Construction Code was a significant step in improving accessibility for people with high support needs and has led to an increase in Changing Places in Airport Terminals including Sydney and Brisbane, with Perth and Adelaide opening Changing Places facilities soon.

Although there has been some progress to include Changing Places in other public transport locations, progress has been slow. Across Australia, there are only **13 facilities** that are in close proximity to public transport stations and hubs, airports and road transport/service station stops. The table below lists these facilities.

Table 2: Changing Places facilities at or near public transport May 2021

State or Territory	Facility
New South Wales	BP Ballina Highway Travel Centre
	Sydney International Airport (2)
	Wigmore Arcade Car Park (near bus interchange)
	Rest Centre Adult Accessible Change Room Wagga Wagga (purpose built for travellers)
Queensland	Brisbane Domestic Terminal
	Brisbane International Terminal
Victoria	Bendigo Train Station
	Carrum foreshore (near Carrum Station)
	Cowes Transit Centre
	Croydon Town Square (near Croydon train station)
	Maude St Bus Interchange Shepparton
Western Australia	BP The Lakes Roadhouse Chidlow

Source: Changing Places website find a toilet <https://changingplaces.org.au/>

Benefits of Changing Places

An evaluation of the Changing Places initiative in 2019 found that:

Changing Places make a very real difference to people with disability, their families and carers by:

- Enabling more freedom and dignity.
- Enabling more choice about where people with disabilities can go in the community.
- Enabling people to stay away from their home for longer.
- Changing Places were safer and reduced lifting injuries for carers.
- Changing Places were more hygienic.

Respondents wanted to see more Changing Places built in more locations – particularly in public transport.

Public Transport Locations requested by Changing Places users

There is strong demand for Changing Places to be built at public transport locations. Two Changing Places surveys were undertaken in 2016 and 2019. As part of the survey Changing Places users indicated where they would like to see more facilities built. Public transport locations were amongst the most frequently requested locations, including service stations, train stations, airports and bus stations

Table 3: Type of locations Changing Places are needed the most in Australia (2019 Survey)



The *Changing Places 2019 Evaluation* by the Centre for Evaluation and Research and Victorian Health and Human Services Building Authority showed that 32% of respondents thought Changing Places facilities were most needed at transport locations such as train stations, bus stations and service stations.

In the same survey, respondents were able to nominate locations they would like to see a Changing Places facility built. Fourteen different transport locations were listed, including metro and regional train stations, ferry interchanges, airports and service stations, with these locations acquiring a total of 27 nominations.

Table 4 provides an analysis of the 2016 and 2019 Changing Places surveys demonstrating the strong demand for Changing Places facilities to be built at public transport locations.

Table 4 Requested locations for Changing Places facilities

Location	2016 Survey (VIC Survey)	2019 Survey*
Train Stations	Geelong Train Station Bendigo Train Station Melbourne Central Shopping Centre & Train Station Flinders St Station Parliament Station Southern Cross Station Echuca Train Station Yarra Ranges Belgrave Puffing Billy Train Station Lilydale Train Station Casey Hallam Train Station Ballarat Train Station Frankston Train Station Monash Glen Waverly Train Station Knox Bayswater Train Station Darebin Preston Train Station Maribyrnong Footscray Train Station Maroondah Ringwood Train Station Box Hill Train Station Warragul Train Station Bairnsdale Train Station Riddell's Creek Train Station Traralgon Train Station Sunshine Train Station St Albans Train Station Mernda Train station Castlemaine Train Station Prahran Train Station Richmond Train Station Dandenong Train Station Melton Train Station Cardinia Officer Train Station	Frankston Station (VIC) Geelong Station (VIC) Flinders St Station (VIC) Southern Cross Station (VIC) Parliament Station (VIC) Shepparton Train Station (VIC) Lilydale Station (VIC)
Bus Stations	Geelong Bus Depot	Moorabool Street Geelong Bus Interchange (VIC)
Ferry terminals	Port of Echuca	Sorrento Ferry terminal (VIC)
Service stations/roadside services	Hume Highway from Wangaratta to Melbourne Seymour Rest Area Hume Hwy	Gunalda Service Station Bruce Highway (QLD) Cowell Service Station (SA)

Location	2016 Survey (VIC Survey)	2019 Survey*
Airports	Avalon Airport Melbourne Airport	Avalon Airport (VIC) Melbourne Airport (VIC) Brisbane Airport (QLD) Gold Coast Airport (QLD)

*The 2019 survey allowed respondents to only nominate up to three different locations, in comparison to the 2016 survey where there was no limit.

International building regulations for Changing Places and public transport.

Although Australia was the first country in the world to include Changing Places in its National Construction Code, both the UK (Jan 2021) and Scotland (March 2020) have now mandated Changing Places be included in public buildings including public transport locations such as major transport terminus i.e. airports and large train stations as well as at motorway service stations.

In our submission, we have incorporated a few themes to be considered.

- Consistency and clarity
- Making Changing Places Mainstream
- Toilet and change room provisions.

Addressing our broad themes

Consistency and clarity

Whilst the National Construction Code (NCC) has gone a long way in ensuring consistency in construction of accessible adult change facilities we would still like to see Disability Standards for Accessible Public Transport mandate Changing Places in addition to standard **accessible facilities at public transport locations**, including premium or major train stations, public transport interchanges/hubs, airport terminals and major road transport services/service stations.

Knowing Changing Places are available gives people with disability and their carer's confidence. Rebecca, mother of Changing Places user Sarah, said knowing the facilities are available is a 'game-changer'. She said:

"It can be really difficult to find safe and dignified places. When you're forced to use these other avenues, anything from having to resort to asking at a medical centre, using the floors of regular accessible bathrooms or even hidden from view in a public park... it's not fair to her, it's not fair to us, it's just not okay."

"We will not spend our family travel dollars somewhere we can't attend to Sarah's needs with dignity, so we choose our destinations accordingly."

In our interview with Briana and Bella, they said:

“When you know a Changing Places is available, it’s a massive relief. It adds some normalcy to your life, so you don’t have to plan out every minute of your day around when you might be able to access a toilet. People without disability don’t need to plan like this. If we all had to plan our lives around going to the toilet, the world couldn’t operate.”

Making Changing Places Mainstream

We need to examine the best path to including Changing Places as a **mainstream requirement of public transport interchanges, hubs and stations where public toilets currently exist**. Adopting, aligning and expanding on measures laid out in the National Construction Code (NCC) which ensures accessible adult change facilities are included in airport terminals, would create a clearer pathway.

Changing Places should be included as a **mandatory requirement of public transport interchanges, hubs, premium or major train, bus, tram and ferry stations and terminals, roadside services and stations where public toilets currently exist**.

Disability Standards for Accessible Public Transport should require facilities that align to current Changing Places Design Standards <http://changingplaces.org.au/build-a-facility/designs/>

A recent interview with Jack Mulholland, Community Access and Inclusion Facilitator at Maroondah City Council – who was in large part responsible for bringing Changing Places to Australia – provided these insights into building awareness with Councils:

‘When you’re working on major projects or building new community infrastructure, you need to make sure it’s accessible for all. We should be covering every community, and make sure all Australians with disability – no matter where they live – can access a Changing Places.’

And particularly relevant to this submission was this comment:

“When it comes to community infrastructure, I’d like to see the people overseeing things make sure what they’re working on is accessible to all, not just being built to standards. If you’re in a position to build a Changing Places, you’re in a position to change lives – it’s really quite powerful.”

Toilet and change room provisions

Your consultation paper refers to a key theme of improving accessibility across the different reform areas, including allocated spaces in transit, wayfinding, and passenger loading areas. **We propose that the construction of Changing Places facilities should be included in the reforms.**

We are of the strong belief the Standards and the community would be best served by adopting a **Universal Design approach** – creating environments that are proactively intended to be useable by all people, without need for adaption.

This will best inform the achievement of our goals, of providing access to all and will empower the fullest possible social participation for the most diverse audience.

Conclusion

Ultimately, we are recommending Changing Places become the norm, with the Disability Standards for Accessible Public Transport mandating Changing Places be built in all key transport locations including public transport interchanges, hubs, premium or major train, bus, tram and ferry stations and terminals, roadside services and stations. This will provide much needed facilities for travellers, and ensure a shared, internationally recognised standard.

In short, our recommendations are:

1. We want to see Changing Places included in the Disability Standards for Accessible Public Transport across all public transport interchanges, hubs, premium or major train, bus, tram and ferry stations and terminals, roadside services and stations.
2. There needs to be one name and one standard for these facilities. We're recommending it be Changing Places – an internationally recognised brand and that the Changing Places Design Specifications 2020 be adopted as the design specification.

By being able to achieve the above **we will truly change lives**. Having access to toilets and bathroom facilities is a **basic human right**. Jack Mulholland best expresses it with:

“You have the power to change people’s lives, you really have. Once you learn about the issue, you can’t unlearn. It’s about people who can’t maximise opportunities in life, just because there’s no toilet available. That isn’t fair.”

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