

26 April 2013

Disabilities Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Dear Sir / Madam

**RE: 2012 REVIEW OF THE DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC
TRANSPORT 2002 (TRANSPORT STANDARDS) SECTOR C: FOR DISABILITY
SECTOR AND PUBLIC VIEWS**

Maroondah City Council welcomes the opportunity to make a submission to the Review.

In recent years, Maroondah City Council has taken a lead with advocacy efforts associated with the introduction of 'Changing Places' facilities. Council has recently designed and constructed a portable Changing Places facility (known as 'Marveloo'), which will be used by many Councils for events across Melbourne.

Council is also working closely with the Association for Children with a Disability (Victoria) to bring state and national attention to the Changing Places cause. This has found form in the establishment of a Changing Places Consortium in 2012. The Consortium has developed designs for Changing Places toilets with the assistance of an architect from the access committee of the Royal Australian Institute of Architects, an occupational therapist and an Access Consultancy Firm with 25 years of experience in architectural design amongst others. The designs have been approved by Changing Places UK thus providing permission to the consortium to use the name Changing Places and their symbol. 

With respect to the current Review, Council is of the view that *the new Disability Standards for Accessible Public Transport 2002 must include provision for Premium Train Stations to have Changing Places accessible toilets.*

In short, standard accessible toilets are not meeting the needs of people with profound disabilities, multiple learning disabilities, as well as spinal injuries, spina bifida, motor neurone disease, multiple sclerosis or an acquired brain injury.

Enhanced facilities are required to allow them and their carers to use toilets effectively and with dignity.

Changing Places toilets are substantially different to standard accessible toilets and include many additional design benefits and features including:

- A height adjustable adult-sized changing bench
- A tracking hoist system
- Additional space
- A safe and clean environment

Without Changing Places toilets being available, carers struggle choosing between changing their loved-ones on dirty toilet floors or leaving them confined to their own home.

Attached below is a weblink to a 2 minute video that highlights the difficulties carers face every day with standard facilities:

http://www.changing-places.org/real_life_stories/jenny_and_craig/jenny_and_craig_video.aspx

Changing Places was introduced in the UK in 2006. They have improved the lives of many people by assisting them to access their community on a daily basis. To date, 500 Changing Places toilets have been introduced across the UK.

The UK has provided strong international leadership. Changing Places toilets have been introduced at Premium Train Stations under British Standard 8300:12.7. This Standard is supported in the UK's Department of Transport's Accessible Train Station Design for Disabled People: A Code of Practice.

In April 2011, 'Arriva Trains' which is the rail company for Wales, opened their first Changing Places facility in Swansea. This has been very well received with an expanded roll out planned.

Changing Places facilities should not just be limited to rail. Airports are another example of high use facilities where improvements are required. Unlike the UK, there are no Changing Places toilets at Australian airports. This makes domestic and international travel for people with a severe or profound disability and their carers a near impossibility outside of changing the person on the floor of the toilet at the airports or having the person with a disability soaked in wet pads.

Council is mindful of recent announcements such as the \$400m new domestic terminal announced for Melbourne Airport. This provides an excellent opportunity for the installation of Changing Places facilities.

Of note, Australia has a strong existing policy basis from which to encourage the introduction of Changing Places facilities. The Australian National Disability Strategy 2010-2020, which has been endorsed by the Federal and all State and Territory governments, has a strong focus on improving conditions for people with a disability and their families. The Strategy is structured around six broad outcome areas. The first outcome is 'Inclusive and accessible communities'. It states:

"People with disability may experience restricted access to social and cultural events and to civic, political and economic opportunities because of inaccessible attributes of the built and natural environment, and of services and programs.. A key first step in removing these barriers is to incorporate universal design into the design and build of community resources, from parks to houses, to shopping centres and sporting arenas."

As public transport is a form of transport used by many, it is logical to improve the built environment to ensure accessibility for all. With the universal design, 'Changing Places', being introduced to Australia there is now a solution available.

There are also strong grounds to pursue Changing Places from a human rights perspective. In July 2010, the United Nations declared sanitation as a human right. By introducing Changing Places in the Disability Standards for Accessible Public Transport, *Australia would be both* upholding United Nations Human Rights and ensuring our transport systems meet the needs of all Australians.

Council notes that the National Disability Insurance Scheme will not directly assist in providing Changing Places facilities. Through the terms of this current Review, the Commonwealth has the opportunity make a real difference to families.

It is worth reflecting that in 2013 our rail system has been in place for well over 150 years along with the first modern flushing public toilet. Yet people with a profound and severe disability and their carers are still waiting for toilets in the community that they can use.

There is clearly scope to make substantial improvements to hundreds of thousands of Australians affected by this issue and Council calls on the Commonwealth to act.

Yours sincerely



Frank Dixon
Chief Executive Officer