

**ROYAL COMMISSION INTO VIOLENCE, ABUSE, NEGLECT AND EXPLOITATION OF  
PEOPLE WITH DISABILITY.**

# Promoting Inclusion Referral Paper Submission

June 2021



## Introduction

Being able to access buildings and facilities is one thing. Being able to spend a day there is another.

Access to fully accessible bathrooms is a fundamental human right, and a pivotal step in creating a truly inclusive society. 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 is 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 complex disability 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 Ireland, Scotland, New Zealand, Australia, Canada and the United States.

In order to champion the rights and inclusion of people with high support needs, it is important to get as many Changing Places across Australia as possible. [A conservatively estimated 1.4 million Australians](#) with profound and severe disability would benefit greatly from the creation of more Changing Places.

For this community, the lack of Changing Places is locking them out of huge parts of society. To ensure Australian society is working towards being truly inclusive, **Changing Places should be made available everywhere public toilets are found.**

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 advocate for Changing Places, promote Changing Places and increase the number across Australia – ensuring Changing Places are a part of accessible standards is vital. So far, there are 174 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 the makeup of an inclusive society. For example, having them included in more public places and funding them through Infrastructure projects and grants to expand the type of buildings where Changing Places must be included.

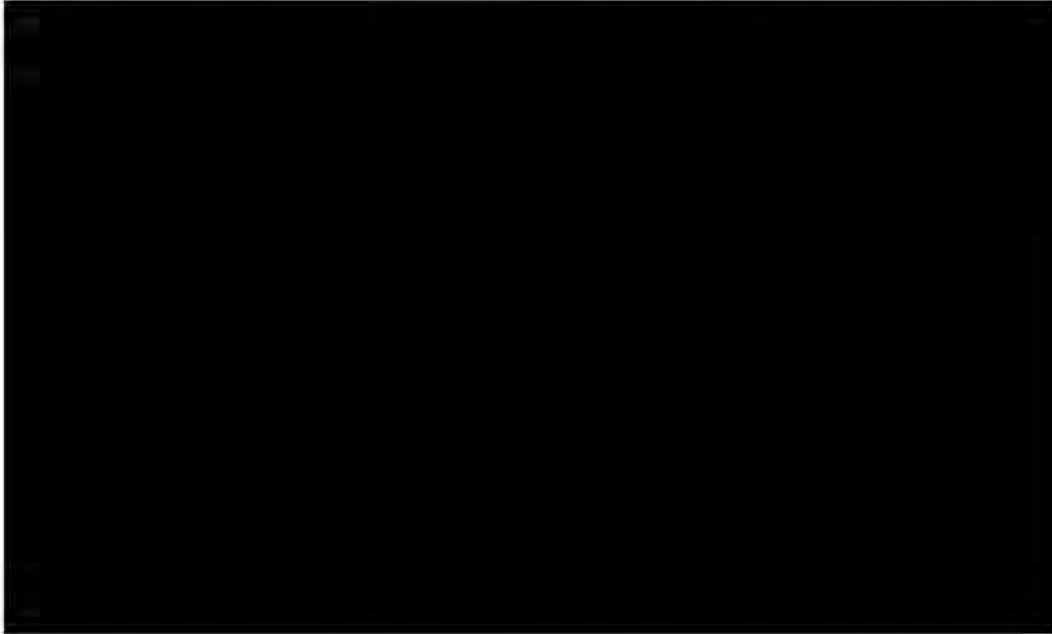
The paper asks the question **What does inclusion mean to you?** Changing Places user [REDACTED], and her best friend [REDACTED] put it simply:

"It's about being able get out and enjoy everything life has to offer. Adventures became tricky when you can't easily find out what is accessible and available for us."



For Changing Places user [REDACTED], an inclusive society is one where she can fulfill her travel dreams.

"I have big travel goals coming up, but sometimes travelling seems virtually impossible. If there's no Changing Places at the airport, you've got to wait until you get to your hotel with a hoist, and if it's ready then you can use a bathroom," she says.



The Changing Places initiative aligns to the different areas considered to be inclusive by the Committee on the Rights of Persons with Disabilities (CRPD), including accessible services and environments being a precondition for the inclusion of people with disability in their local communities and for them to have an independent life. Changing Places facilities also support the second area put forward by the CRPD, by providing the opportunity to "live a full social life and have access to all services [including] cultural life in the community, among others, public meetings, sports events, cultural and religious festivals and any other activity in which a person with disability wishes to participate."

Commitment to building Changing Places need to continue and is imperative in promoting inclusion throughout society.

### ***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 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 June 2021 there are **174** Changing places across Australia, with the majority in Victoria.

**Table 1 Number of Changing Places in Australia June 2021**

State or Territory	Number of Changing Places Facilities
Australian Capital Territory	1
New South Wales	25
Northern Territory	0
Queensland	17
South Australia	10
Tasmania	2
Western Australia	34
Victoria	85

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.

## **Benefits of Changing Places**

The benefits of Changing Places facilities are real examples that can be used to answer the proposed question in the paper: **How can an inclusive society support the independence and choice and control of people with disability** in particular reference to supporting a person with disability's right to live free from **neglect**.

As outlined in the paper published by the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*, for a society to be truly inclusive, systematic issues that involve "depriving a person with disability of basic necessities of life" need to be addressed. We believe that access to safe, dignified, and hygienic bathroom facilities is basic human right.

██████████ mother of Changing Places user ██████████ said she knows what happens when there isn't access to appropriate facilities all too well, and unfortunately is victim to barriers of inclusion on many occasions. 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 ██████████ needs with dignity, so we choose our destinations accordingly."*

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.

These benefits align strongly to elements of an inclusive society as outlined in your paper. By helping ensure a commitment to building Changing Places, the Royal Commission recommendations will be directly helping promote inclusion in society.

Two Changing Places surveys were undertaken in 2016 and 2019. As part of the 2019 survey Changing Places users indicated where they would like to see more facilities built. Respondents wanted to see more Changing Places built in more locations – particularly in shopping centres, visitor/tourist attractions, hospitals, leisure centres, parks and gardens, train stations, airports and playgrounds.



*The Changing Places facility at Chadstone Shopping Centre*

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

- Consistency across standards.
- Embedding co-design and Universal Design into infrastructure projects by making Changing Places mainstream
- Toilet and change room provisions.

## Addressing our broad themes

### Consistency across standards

The paper asks: ***What is the role of governments through legislation, policy making, funding and operation of public systems and services, in achieving an inclusive society?***

In order to ensure consistency across national and state access standards we **recommend** that the Royal Commission include a commitment to advocate for consistency across national building regulations and call for the inclusion of Changing Places design to be adopted in the Disability (Access to Premises – Buildings), Disability Standards for Accessible Public Transport (DSAPT) and the Disability Standards for Education.

In addition, we **recommend** that the Government supports the expansion of the types of buildings included in the NCC and other related standards to include:

- Universities
- Schools
- Hospitals and health services
- Public transport locations, including premium or major train stations and public transport interchanges/hubs
- Major tourist destinations/visitor attractions
- Parks and gardens, including National Parks
- Accessible playgrounds (e.g. Livvi's Place)
- National Public Buildings and offices.

In having Changing Places facilities included consistently across all building standards, the Government will in turn be assisting **non-government institutions and the private sector in achieving an inclusive society**, through new build legislation that must be adhered to.

Consistency across standards would also provide a part of the solution in providing **consistent support for people with disability whilst also promoting an inclusive society**.

## Embedding co-design and universal design into infrastructure projects by Making Changing Places mainstream

The NCC has made a wonderful start, but only covers certain classes of building. We recommend that the Royal Commission recommend including Changing Places as a **mainstream requirement of all Government funded projects where public toilets currently exist and expands the types of buildings** required to have a Changing Places to also include:

- Universities
- Schools
- Hospitals and health services
- Public transport locations, including premium or major train stations and public transport interchanges/hubs
- Major tourist destinations/visitor attractions
- Parks and gardens, including National Parks
- Accessible playgrounds (e.g. Livvi's Place)
- National Public Buildings and offices

We **recommend** that facilities be built to the Changing Places Design Standards. In doing so, the Royal Commission would be further supporting a consistent approach in developing a more inclusive society.

<http://changingplaces.org.au/build-a-facility/designs/>

██████████ supports this recommendation:

*"We know that Changing Places facilities are critical in assisting people with high support needs, their families and carers to participate more easily in their community and engage in recreation activities. It is therefore imperative that the Government take all necessary steps to ensure that, over time, Changing Places facilities are available in all regions."*

We also **recommend** that Changing Places facilities be required in the larger Government Offices in order to improve visitor experience and to increase access to employment opportunities for people with high support needs.

In our interview with ██████████, 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."*

And particularly relevant to this submission was this comment from ██████████

*"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. We should be covering every community, and make sure all Australians with disability – no matter where they live – can access a Changing Places. If you're in a position to build a Changing Places, you're in a position to change lives – it's really quite powerful."*

## Universal Design

We are of the strong belief the Royal Commission and the community would be best served by a revised **Universal Design approach (including the above recommendations)** – creating environments that are proactively intended to be useable by all people, without need for adaption.

This will best inform the achievement of the Promoting Inclusion paper's goals, of providing access to all, empowering the fullest possible social participation for the most diverse audience.

## Conclusion

In responding to the questions: ***What practical and sustainable steps can governments take to promote a more inclusive society for people with disability?*** and ***What practical and sustainable steps can non-government institutions, the private sector and communities take to promote a more inclusive society for people with disabilities?*** We believe that Changing Places are a pivotal component of the answer.

Ultimately, we are recommending Changing Places become the norm.

By including commitments to the Changing Places initiative, both governments and non-government institutions, the private sector and communities will be championing the rights and inclusion of people with high support needs across Australia.

\_\_\_\_\_ openly expresses his support for Changing Places, its growing network, and our recommendations accompanying this submission:

*"You are supporting a very worthy and long overdue endeavour which I am pleased to continue to support."*

In short, we are proposing three key recommendations that address your question in what needs to change in:

- Laws, policies and standards
- Implementation, monitoring and accountability measures
- Service provision

These recommendations are as follows:

1. We need to continue to **build awareness for Changing Places and mandate for them to become mainstream**. We want to see Changing Places across:
  - Universities
  - Schools
  - Hospitals and health services
  - Public transport locations, including premium or major train stations and public transport interchanges/hubs
  - Major tourist destinations/visitor attractions
  - Parks and gardens, including National Parks
  - Accessible playgrounds (e.g. Livvi's Place)
  - National Public Buildings
2. There needs to be **one name and one standard** for these facilities. We're recommending it be Changing Places – an internationally recognised, consistent and comprehensive standard.
3. We further **recommend** that each Government Department and peak national body for the private sector be required to develop a clear strategy on how they will ensure more Changing Places are constructed and sets targets for how many Changing Places they will build or fund.



Legislated standards for Changing Places need to be the norm, so we ensure standards are adhered to with few to no exemptions. There should be a commitment to advocate for consistency across national building regulations and call for the inclusion of Changing Places design to be adopted in the Disability (Access to Premises – Buildings), Disability Standards for Accessible Public Transport (DSAPT) and the Disability Standards for Education.

By being able to achieve the above **we will truly change lives**. Having access to toilets and bathroom facilities is a **basic human right**. [REDACTED] 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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