



# **Changing Places Risk Management Guide**

Contact:

WALGA

ONE70, LV 1, 170 Railway Parade West Leederville

Phone: (08) 9213 2000

Fax: (08) 9213 2077

Email: [info@walga.asn.au](mailto:info@walga.asn.au)

Website: [www.walga.asn.au](http://www.walga.asn.au)

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## 1.0 Introduction

Changing Places are public toilets designed for people who cannot use Standard Universal Access Toilets. They have additional features including an adult-size height adjustable change table, peninsular toilet, ceiling hoist, enough space for two support persons to assist, automatic doors and a locking system. Some include a shower.

A Changing Place is not open to the general public. It is kept locked to help ensure a clean, safe environment for Changing Places users, and to reserve the facility so it is available for users as needed. Changing Places can be accessed using a Master Locksmith Access Key (MLAK).

Like any public asset the construction and operation of a Changing Place is not without some risk, however like all public amenities, a well-considered risk management plan can mitigate the risks and maximise the benefits to the community.

This guide was developed to support Local Governments to develop their own risk management plan for Changing Places. Local Governments are encouraged to consult with their staff and their community when developing their plan.

This guide would not have been possible without the collaboration and input of several stakeholders. This includes Local Governments and public authorities developing and operating Changing Places, LGIS and the partners of the WA Changing Places Project - WA Local Government Association, National Disability Services WA and the Department of Communities, Disability Services (formerly Disability Services Commission). This guide was developed in consultation with business consultancy service, *Strategic Support*.

**Disclaimer:** This document is a guide only and does not constitute legal advice. Local Governments are advised to undertake their own risk management assessment and develop mitigation strategies appropriate to those risks. Local Governments should seek independent legal advice on any matters of legal liability or concern.

## 2.0 Responsibility

Like all other Local Government assets, the Local Government is responsible for the maintenance, upkeep and serviceability of a Changing Place. In doing this, Local Government should ensure the Changing Place is subject to all usual asset management practices.

A Changing Place like all other Local Government facilities is also a workplace for some staff and occupational health and safety legislation and regulations apply.

### 3.0 General considerations

Organisations constructing and operating Changing Places need to ensure effective communication with staff and community members who may need to use a Changing Place. Information should be provided on the Local Government's website, be available at visitor's centres and at the Changing Place. Changing Places can also be regularly promoted through social media including information about any closures.

In addition to promoting the availability of the facility, good information supports staff and community members to understand how Changing Places work and their responsibilities.

#### Policy

Organisations should ensure the obligations of staff are reflected in relevant policies including:

- Staff of organisations who provide a Changing Place are not to physically assist people to use a Changing Place.
- Changing Places are intended for use by people with disability who generally require the assistance of a support person/s. It is reasonable to expect that anyone intending to use a Changing Place will be accompanied by a support person/s who is familiar with the user's needs and use of specialist equipment (i.e. hoists and change tables).  
Note: some people with disability can independently self-transfer onto a toilet and may wish to access a Changing Place as it contains a peninsular toilet which enables them to self-transfer from either side of the toilet.
- Changing Places should be placed on the organisations Asset Management Plan Register to define levels of service and processes used to manage each of their assets.
- The requirement for regular inspection and maintenance of the hoist, battery system and other equipment.
- The requirement for a regular cleaning schedule.
- Organisations should ensure that a service response for complaints handling process is in place to manage and respond to user feedback.
- Changing Places should be considered as part of an organisations accident/ injury policy and public liability policy.

#### Instructions and signage

Emergency contact details are to be made available on the responsible Local Government's website, within the Changing Place itself, the Australian Public Toilet Map and the Changing Places Australia Toilet Map.

Manufacturers of equipment within a Changing Place generally provide instruction sheets for their use and these need to be provided for all equipment. Instructions are to be supplied inside a Changing Place and include any warnings such as maximum weights. Warning information should include a notice that only people experienced in using a hoist should use this equipment.

Information and signs need to be displayed close to the equipment and be easy to read. Notices will make it clear that users of equipment are in effect agreeing they are competent in the use of the equipment. It is recommended an easy English version of the instructions also be provided so support persons with disability can read them.

All signage and information must advise people they are to provide their own sling for health and safety reasons. Information on the specific hoist in the Changing Place must be made available to users to ensure people bring an appropriate sling for the hoist. Local Governments must not provide slings in Changing Places due to the risk of cross infection or safety issues that could arise if a person was not familiar with the type of sling provided.

Local Governments should place the same information on their website so that users of the facility are prepared with relevant equipment, including a compatible sling.

### **Equipment and maintenance**

All specialist equipment, including hoists and change tables, should be fitted according to Australian Standards and the manufacturer's instructions. They should be regularly inspected and maintained according to manufacturer's servicing schedules. All inspections must be carried out by a competent person. This may include the need to use a third-party contractor with skills, knowledge and experience with these facilities. Another consideration is the risk of a power failure or damage. Organisations should ensure that a regular maintenance and inspection programme is adhered to.

The organisation should ensure the facility is kept as clean and hygienic as possible. Provide signage that tells users how to maintain hygiene and keep the area clean. Equipment that helps users keep it clean should be included, for example tear off paper towels to cover the change table, a large sanitary bin for the disposal of continence aids, and chemical wipes.

### **Locks and keys**

Organisations should regularly inspect and maintain MLAK locks. It is recommended that dry lubricant is used on the key barrel and tumbler every three to six months to protect the lock from erosion, and more regularly for those in harsh / coastal environments

Wherever possible organisations should gather data on usage rates so the asset can be managed appropriately.

## 4.0 Potential hazards and treatment options

Organisations that provide and operate a Changing Place are advised to carry out a full independent risk assessment that considers the potential risks, their likelihood and probability, the seriousness of those risks and action that can be taken to reduce or remove the risk.

Whilst the hazards and risks associated with each facility can vary depending on both internal and external factors, the following table provides some examples of the sorts of hazards and treatment options that may be considered:

Potential Hazard	Treatment Options
<b>Asset management</b>	
Legal liability for public amenity	Undertake risk assessment and mitigate risks.
Change in specifications required for accreditation	Monitor Changing Places Australia technical specification.
Equipment malfunctions or breaks	<p>Install and maintain all equipment according to the manufacturers' instructions and the relevant Australian Standard.</p> <p>Maintain inspection schedule for all equipment as per the equipment's applicable Australian Standard.</p> <p>Lock out procedures for damaged equipment.</p>
Delay in fixing broken equipment inconveniences community members	<p>Specify requirements in service contracts.</p> <p>Provide signage at facility (with alternative if available nearby) and information on website about delay.</p>
Equipment is dirty	<p>Utilise contract cleaner.</p> <p>Develop maintenance policy.</p> <p>Develop cleaning schedule relevant to the facility.</p> <p>Provide tear off paper or paper hand towels and a large waste bin for disposable pads.</p>

Power failure leaves door open, leaving facility open to misuse	<p>Check manufacturer's instructions and ensure facilities staff have required information on manual systems override where available.</p> <p>Implement restricted access procedures that may include barricades, signage and patrols.</p>
Onsite emergency requiring evacuation	<p>Include Changing Place in emergency plan.</p> <p>Display evacuation advice inside facility.</p>
<b>Staffing</b>	
Staff asked to assist a person to use a Changing Place	Staff are advised not to provide attendant care.
Staff are asked for advice on how equipment works	Staff are advised not to provide advice on operating equipment. Frontline staff or key holders are provided with access to a copy of printed instructions to provide to users.
<b>Usage</b>	
Person is injured/harmed	<p>Install equipment as per manufacturer's instructions.</p> <p>Provide information and signage on how to use the equipment according to manufacturer's instructions.</p> <p>Do not provide slings to use with the hoist. Communicate requirement for users to provide their own slings.</p> <p>Include Changing Places in Public Liability policy.</p> <p>Use existing complaints policy and process to manage complaints.</p>
Facility being mistreated by other people	<p>Routine visual inspections.</p> <p>Restrict access and only permit use of loan key to persons with disability or another authorised user.</p> <p>Routine security associated with asset management e.g., patrols or CCTV.</p>
Misuse of nearby Acrod Parking bay	Complaint process.



	Ranger contact information at location and ranger enforcement.
Person arrives at facility unaware they need to obtain a key beforehand	Advertise terms of use and need for users to have their own MLAK key.  Display information about borrowing a key and the contact information at the facility.
Person forgets their key	Frontline staff, security staff to carry spare key with contact number of location information provided at front of Changing Place.
Person's sling doesn't fit the hoist	Communicate the person and or their support person is responsible for providing equipment.
Person gets hit by door or gets stuck in doorway	Calibrate automatic door to include enough time for people to enter safely.  Install a fail-safe opening mechanism to automatic door.  Install sensors in doorway to indicate when objects are in the doorway.
Person gets locked inside	Install emergency exit button or call phone inside Changing Place.
Changing Place not available when people need it	Ensure Changing Place is open at same times as other public toilet facilities.  Allocate a routine cleaning time so people can plan access.  Promote opening hours.
Person can't find Changing Place  Low usage rate	Include location/s on Local Government website. Submit information to the Department of Communities website, National Disability Services WA, Changing Places Australia (map) and the National Toilet Map (app).
Environmental risks	Schedule pest control Motion sensor lighting Antiskid- pathways Colour contrast Maintain site and vegetation Signage Respond to customer complaints.

## 5.0 Legislation and standards

### **Disability Discrimination Act**

The Disability Discrimination Act 1992 (DDA) makes it unlawful to discriminate against a person because of their disability.

### **Disability Services Act**

The Disability Services Act 1993 (amended 2004) requires all Local Governments to develop and implement a Disability Access and Inclusion Plan (DAIP). DAIPs assist public authorities to plan and implement improvements to access and inclusion in their community.

### **Equal Opportunity Act**

The Equal Opportunity Act 1984 provides for discrimination in relation to access to places, services and facilities.

### **Carers Recognition Act**

Carers are formally recognised under the Carers Recognition Act 2004 and it is a requirement that carers are treated with respect and dignity, and their views and needs are considered.

### **Building Act**

The Building Act 2011 provides for the issuing of permits for building work and demolition work, standards for the construction and demolition of buildings and incidental structures, the use and maintenance of, and requirements in relation to, existing buildings and incidental structures and managing work affecting land other than land on which the work is done.

### **Occupational Health and Safety Act and associated Regulations, codes of practice and standards**

The Occupational Health and Safety Act 1984 places certain duties of care for safety and health at the workplace on employers, principal/main contractors, sub-contractors, people involved in labour hire, employees, self-employed people, manufacturers, designers, importers and suppliers.

### **Health Act and Health (Public Buildings) Regulations**

The Health Act 1911 and the Health (Public Buildings) Regulations 1992 provide for public sanitary conveniences, drains, privies etc. to be properly kept.

### **Disability Access to Premises Standards**

The Disability (Access to Premises – Buildings) Standards apply to any buildings or major redevelopments commencing after May 2011 and aim to provide people with disability with dignified and equitable access to buildings, and provide certainty to industry that they are complying with the DDA.

## National Construction Code

The National Construction Code (NCC) provides the minimum necessary requirements for safety, health, amenity and sustainability in the design and construction of new buildings in Australia. The NCC incorporates all on-site construction requirements into a single code, comprising of the Building Code of Australia (BCA) and the Plumbing Code of Australia (PCA).

## 6.0 Example Risk Rating table

Local Government are encouraged to utilise their existing risk management framework when managing the risks associated with the Changing Places facility. The following risk tables can be used as a guide:

Risk Rating	Action required
Extreme	Requires treatment to eliminate the risk as this level of risk is unacceptable.
High Mitigate	This level of risk requires treatment to mitigate impact and lower the rating to a more acceptable level.
Substantial	Accepted with detailed treatment plan and ongoing review.
Moderate	Accepted with detailed treatment plan and ongoing review.
Low	Acceptable level of risk unless additional controls are available.

Likelihood		Consequence				
		1 Minor	2 Disruptive	3 Serious	4 Critical	5 Catastrophic
5	Almost certain	Moderate	Substantial	High	Extreme	Extreme
4	Likely	Low	Moderate	Substantial	High	Extreme
3	Occasional	Low	Moderate	Moderate	Substantial	High
2	Possible	Low	Low	Moderate	Moderate	Substantial
1	Rare	Low	Low	Low	Low	Moderate

## 7.0 Example of maintenance schedule

This schedule is currently used in WA to manage risks associated with a Changing Place.

Item	Description	Interval
Change table	Inspection	Daily
	Service	6 months
Hoist (and battery)	Inspection	Daily
	Service	6 months
Automatic door	Inspection	Daily
	Test	Daily
	Service	3 Months
Lock	Inspection	Daily
	Test	Daily
	Service	Manufacturers instruction
Water heater thermostat	Testing and service	12 months
Shower screen and fan	Inspection	Daily
	Service	When required
Power/ Lights/hand dryer	Inspection	Daily
	Service	When required
Plumbing	Inspection	Daily
	Service	When required
Paper towel dispenser and stock	Service	Daily
Signage	Inspection	Daily
	Replace	As required

## 8.0 Further reading

Changing Places Australia. Information on design and accreditation <http://changingplaces.org.au/>

Changing Places Information Guide & Technical Standard June 2017 by Changing Places Transforming Lives (Victoria). Includes discussion of requirements for safe operation. [www.dhs.vic.gov.au](http://www.dhs.vic.gov.au)

Changing Places-The Practical Guide by the Changing Places Consortium (UK). Includes detailed consideration of different aspects of risk and a management checklist. <http://www.changing-places.org>

## Changing Places in Western Australia

Changing Places Grants Program WA Local Government Association. <http://walga.asn.au/Policy-Advice-and-Advocacy/Community-Development/Inclusive-Communities/Disability-Inclusive-Communities/Changing-Places-Grants-Program.aspx>

Changing Places improving community access. Department of Communities  
[www.disability.wa.gov.au/individuals-families-and-carers/for-individuals-families-and-carers/recreation-and-leisure-/changing-places/](http://www.disability.wa.gov.au/individuals-families-and-carers/for-individuals-families-and-carers/recreation-and-leisure-/changing-places/) or search 'changing place'

National Disability Services WA  
[www.wacompanioncard.org.au](http://www.wacompanioncard.org.au)