Australian Rehabilitation and
Assistive Technology Association (ARATA)

ARATA's response to the ABCB Consultation on
Housing Accessibility

Suggested citation:

Callaway, L. & Layton, N. (2018, November). ARATA's response to the ABCB Consultation on Housing Accessibility. Beaumaris, Victoria: Australian Rehabilitation and Assistive Technology Association. Access via: http://www.arata.org.au/

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EXECUTIVE SUMMARY

The Australian Rehabilitation & Assistive Technology Association (ARATA) – as a national not-for-profit membership association of assistive technology consumers and practitioners – is pleased to respond to the Australian Building Codes Board (ABCB) Consultation on Housing Accessibility. In putting together this response, the authors have drawn on the current National Construction Code (Australian Building Codes Board, 2016), the ABCB Accessible Housing Options Paper (Australian Building Codes Board, 2018), Livable Housing Design Guidelines (Liveable Housing Australia, 2017), existing international policy and peer-reviewed literature, occupational therapy practice and lived experience of housing accessibility, and information presented by the ABCB in the Accessible Housing National Consultation Forum hosted by the ABCB in Melbourne on 31st October 2018, which Libby Callaway attended.

Considering the percentage of Australians who will benefit from accessible housing across the lifespan, ARATA supports **implementation of LHDG Gold level** within the National Construction Code (NCC). This is Option 3 proposed within the ABCB Consultation on Housing Accessibility (Australian Building Codes Board, 2018). Noting that the NCC takes a focus on minimum necessary standards for design, construction, performance and liveability of new buildings, this would ensure that Australia's responsibility as a signatory to the UN Convention on the Rights of Person with Disability can be upheld and that – across the lifespan – Australians can live with maximum independence, autonomy and control.

WHAT IS ARATA & WHAT DOES ARATA DO?

The Australian Rehabilitation & Assistive Technology Association (ARATA) is a national not-for-profit membership association of assistive technology consumers and practitioners. ARATA is focused on enhancing the lives of people of all ages and abilities through the best use of assistive technology. The Association is a forum for knowledge sharing between the range of people who are involved with the use, prescription, customisation, supply and ongoing support or training in the use of assistive technology. This includes application of home modifications, smart technologies and accessible design in housing. ARATA represents skilled practitioners, consumers, and suppliers Australia wide and is linked to sister organisations worldwide through the Tokushima Agreement (ARATA, 2012).

WHAT IS ASSISTIVE TECHNOLOGY?

Assistive Technology (AT) is an umbrella term for any device or system that allows individuals to perform tasks they would otherwise be unable to do, or increases the ease and safety with which tasks can be performed (World Health Organisation, 2004). AT can be anything from a simple device such as a single grab rail in the bathroom to a complex wheelchair or home automation system. AT is vital in enabling participation in society despite the presence of disability. AT not only minimises the impact of impairments, but it enables people to:

- enhance their independence
- work and volunteer
- care for themselves and others
- engage in cultural, social, educational, recreational and spiritual lives alongside the rest of the community.

In addition to a specific device or system used (i.e. 'hard technology'), 'soft technology' is frequently necessary, and may at times be overlooked, when planning AT. Soft technology refers to human factors essential to successful delivery and use of the 'hard technology' (the AT device). Soft technology includes assessment, collaborative planning, trial, training, AT set up and customisation, repairs, maintenance and review. AT needs to be well matched to the user, the tasks they undertake, and the environments in which they engage in daily life. This is the role of AT practitioners. The specialist skills of AT

practitioners are critical in maximizing investment of public and private AT funds[1] (ARATA, 2012).

ASSISTIVE TECHNOLOGY, ACCESSIBLE HOUSING & THE AUSTRALIAN POLICY CONTEXT

ARATA takes a focus on assistive technology (AT) users across the lifespan. Assistive technology can be an enabling factor in the delivery of outcomes for Australians. In 2012, as part of the 'Making a Difference with AT' paper series, ARATA published a paper on the positive consumer outcome and economic potential of AT solutions (Layton & Walker, 2012). As part of these considerations, and to reduce the cost of AT investment required for Australians, ARATA endorses a focus on universal design within housing.

Universal design is 'the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability … if an environment is accessible, usable, convenient and a pleasure to use, everyone benefits' (Centre for Excellence in Universal Design, 2014). Universal design offers benefit to a large proportion of Australians, including the nation's aging population, people with disability, families with young children and those who experience chronic illness or short-term injury. Australia is now moving into the 9th year of a 10-year National Disability Strategy which espouses a vision of 'an inclusive Australian society that enables people with disability to fulfil their potential as equal citizens' (Department of Social Services, 2010, p. 1). Australia's ten-year National Disability Strategy further identifies the need for universal design in housing, noting 'the number of people with disability is growing significantly at both ends of the lifecycle – young and old – including those with the highest needs' (Department of Social Services, 2010, p. 19).

Most recent ABS data indicates that the Australian population is aging, with one in seven Australians (15.1% or 3.5 million) aged over 65 years, with the majority (94.8%) living in their own homes. Following, one in five Australians (18.5% or 4 million people) identify as experiencing disability, defined as a 'a limitation, restriction or impairment, which has lasted, or is likely to last, for at least six months and restricts everyday activities' (Australian Bureau of Statistics, 2016). The lack of accessibility in housing, particularly for

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[1] For further details, see http://www.arata.org.au/download/arata_flyermay2012.pdf

older people and those who experience temporary or permanent health conditions or disability, 'costs both government and individuals millions of dollars each year in hospital admissions, home care, early aged care admissions and expensive modifications' (Victorian Council of Social Service, 2008, p. 7).

Article 9 of the UN Convention on the Rights of Persons with Disability (UN CRPD) focuses on accessibility, and the rights of persons with disabilities to have access, on an equal basis with others, to the physical environment (United Nations, 2006). Article 19 of the UN CRPD is focused on the right to live independently and be included in the community. Australia is a signatory to this Convention, which proposes that people should have 'the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement'.

Specific to Australians aged under 65 years who experience significant and permanent disability, the introduction of Australia's $22B National Disability Insurance Scheme (NDIS) offers opportunity for eligible participants to plan for personalised AT equipment, home modifications, and associated 'soft technologies' and supports linked to participation goals (National Disability Insurance Scheme, 2016). However, once the Scheme is fully launched, NDIS participants will represent only 1.8% of the total 24.6M Australian population. For the remaining 16.7% of Australians identifying with disability and the group within the 15.1% total of older Australians who need accessibly housing, urgent action is required to increase the stock of accessible housing in Australia. This will ensure that people can choose to age in place or move with greater choice of accessible housing stock in the future. This will also deliver potential for a direct cost-benefit to the Australian government and the tax payer, with a reduction in spending on home modifications through disability or aged care schemes.

There are some key benefits for a National Construction Code that offers minimum necessary standards in the provision of accessible housing. These include maintaining participation and independence across the lifespan and reducing the risk of 'disablement' stemming from inaccessible environments. Disablement is a term used 'to emphasize the potentially disabling impact of environmental barriers for people with impairment. The locus of disablement occurs in the space between individuals' capabilities, the tasks they aspire to, and the environments in which they exist. Disability can therefore be defined as

impairment of body structure or function combined with subjective experience of disablement brought about by environmental barriers. Should environmental barriers exist, the effects of impairment are magnified and the person experiences disablement' (Layton & Steel, 2015, p. 11147).

ARATA'S POSITION ON THE ABCB CONSULTATION ON ACCESSIBLE HOUSING

The Board of ARATA endorses the proposal-for-change presented by Australian Network for Universal Housing Design (ANUHD) and Rights & Inclusion Australia (R&IA) in 2016, seeking amendment of the National Construction Code to include accessibility standards for housing. Specifically, ARATA agrees with ANUHD and R&IA's position that there has to date been an inability of the housing industry to respond to the National Dialogue agreement in 2010 and the subsequent COAG commitment within the National Disability Strategy and inconsistency across Australia in what is considered to be accessibility in housing.

Considering the percentage of Australians who will benefit from accessible housing across the lifespan, ARATA supports **implementation of LHDG Gold level (Option 3)** within the National Construction Code. Noting that the National Construction Code takes a focus on minimum necessary standards for design, construction, performance and liveability of new buildings, this would ensure that Australia's responsibility as a signatory to the UN Convention on the Rights of Person with Disability can be upheld and that – across the lifespan – Australians can live with maximum independence, autonomy and control.

Previous reporting has indicated that 'if regulation were implemented, the costs of the mandated (universal housing) features would decrease with competition and bulk purchasing as they became standard across the construction industry. Standardisation across designers and architects would also reduce costs' (Victorian Council of Social Service, 2008, p. 4). ARATA endorses this position and encourages government to invest in further research that examines the cost-benefit implications of this change in the NCC. This will allow true representation of evidence on both the economic and social impact of this amendment. It will also allow Australians to be further informed regarding costs incurred in accessible housing build and associated tax payer benefit through reduction in social, aged and health care investment required.

ARATA would welcome the opportunity to discuss this submission further – if required, please contact ARATA president, Dr Natasha Layton, via president@arata.org.au

Dr Natasha Layton   Libby Callaway
ARATA President   **ARATA Board Member**

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