# **Buckle Covers Model Policy** self & others underneath seath release arms Unbuckle Release Slide Open windows of 80% Move Interfere Trapped in crash or emergency driver or passage MACA Mobility & Accessibility for Children & Adults www.macahub.org



#### Buckle Covers Model Policy

#### Publication date: Version 2, March 2025

This model policy has been developed by Mobility and Accessibility for Children and Adults Ltd (MACA).

MACA is a registered charity dedicated to advancing the rights of children with disabilities and medical conditions to safe and equitable transport. For more information, visit macahub.org

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#### Legal disclaimer

MACA believes this publication to be correct at the time of publishing and does not accept responsibility for any consequences arising from the use of information herein. Users should rely on their own professional skill and judgement in applying this model policy in their work.

This model policy is not intended to promote modification of Australian standard child restraint systems or vehicle seatbelts. MACA acknowledges the limited evidence-base and access to appropriate vehicle restraint systems for many people with disabilities and medical conditions in our community. As the evidence-base continues to advance, MACA will review and update this model policy.

This policy is designed to guide organisations in meeting their professional and legal obligations. The guidance materials cater for motor vehicle occupants of all ages.



Mobility & Accessibility for Children & Adults

# **Buckle release** and associated travel challenges

Policy guidance for the prescribing and use of child restraint and seatbelt buckle covers

### 1. Introduction

Buckle covers are a low-cost, higher-risk assistive technology\* usually prescribed for vehicle passengers with disabilities and/or behaviours of concern who habitually release their child restraint and/or seatbelt buckle.

Buckle covers are commonly prescribed by allied health professionals in Australia (Black et al, 2024). Even though these devices are often needed, there's a lack of research and knowledge about their safety, features and appropriate use. This presents an unacceptable road safety risk impacting organisations' and allied health professionals' ability to appropriately support families and clients.

This model policy has been developed by Mobility and Accessibility for Children and Adults Ltd (MACA), as part of the Commonwealth Office of Road Safety, Road Safety Innovation Fund (RSIF); and the Australian Government Department of Social Services, Information, Linkages and Capacity Building grant. The RSIF project was delivered in collaboration with La Trobe University, Centre for Technology Infusion, and included a:

- desktop review of buckle covers available in Australia and from overseas
- legislative and regulatory review relating to the supply and use of buckle covers across Australian jurisdictions
- publication inviting researchers, vehicle manufacturers, and innovators to develop new products and solutions that effectively respond to buckle release, and road safety risks.

This model policy is intentionally informative and presents a framework to assist organisations to develop policies and procedures specific to their setting. It is regularly updated in response to feedback and legislative changes.

\* The NDIS Assistive Technology Product Risk Table classifies "mobility and postural support or correction devices", "motor vehicle adaptions", and "items that potentially restrict voluntary movement" as higher-risk assistive technology products, noting in their broad description that these type of products "will generally require advice from an assistive technology advisor or assistive technology assessor for the right item selection and good outcomes". [4]

# 2. Purpose

The Buckle Cover Model Policy aims to:

- provide knowledge and guidance on best practice approaches and legal requirements for prescribing child restraint and seatbelt buckle covers for use in motor vehicles
- support the rights of people with disabilities and/or behaviours of concern to access suitable assistive technology for their transport needs
- reduce the risks of driver distraction for families, carers and employees when transporting passengers in motor vehicles.

### 3. Values

Values are unique to each organisation. The following are provided as examples only. [insert name of organisation] is committed to:

- applying family- and person-centred practice
- a best practice approach to supporting the rights of children and adults with disabilities and/or behaviours of concern to safe motor vehicle transport
- the Safe System approach to road safety (refer to section 7, Definitions)
- providing a safe workplace for employees involved in transporting children and adults in motor vehicles
- reducing or eliminating restrictive practice.

[insert additional values relevant to the organisation]

## 4. Scope

This model policy sets out considerations for organisations and allied health professionals prescribing child restraint and seatbelt buckle covers for vehicle passengers in accordance with best practice.

There are additional requirements where a seatbelt buckle cover is used in a heavy vehicle, where Heavy Vehicle National Law applies. This includes for all states and territories, except Northern Territory and Western Australia. The National Heavy Vehicle Regulator is currently revising their requirements relating to the use of seatbelt buckle covers. This model policy will be updated to reflect these changes when they are implemented.

Note: A heavy vehicle is defined in the Heavy Vehicle National Law (HVNL) as a vehicle that has a gross vehicle mass (GVM) or aggregate trailer mass (ATM) of more than 4.5 tonnes, which includes passenger buses.

# 5. Background

In 2020/21, MACA and La Trobe University received funding from the Commonwealth Office of Road Safety to undertake a project: Buckle release — eliminating road safety risks for children with disability. This project was initiated in response to the gaps in road safety knowledge, research and practice relating to buckle covers and their use.

The most common products used in Australia to manage buckle release challenges are child restraint and seatbelt buckle covers, which are assistive technology devices applied to the buckle, intended to prevent the vehicle passenger from releasing their restraint buckle.

The project assessed the compliance of buckle covers against the Australian Standard AS 8005 Accessories for child restraints used in motor vehicles which includes requirements for the design, safety and performance of child restraint and seatbelt buckle covers.

This review (MACA Ltd and La Trobe University, 2021) identified that no buckle cover complies with AS 8005. Further, consultation activities found that:

- there is variable quality of materials used to produce buckle covers
- there is limited to no information provided by product manufacturers about the risks associated with using buckle covers
- some products are easy for vehicle passengers to remove (not fail-proof)
- seatbelt buckle covers may introduce additional risks such as the person attempting to get out by sliding under the lap part of the seatbelt
- parents and carers often seek solutions to unbuckling challenges and purchase products directly from suppliers and online (and subsequently inform their allied health professional)
- allied health professionals generally do not feel confident recommending a buckle cover in the first instance and prefer to trial behavioural strategies
- there is inconsistent advice relating to restrictive practice and the use of buckle covers
- the legislative and regulatory requirements for the legal use of buckle covers on our roads is inconsistent (or unclear) across states and territories.

The application of a child restraint or seatbelt buckle cover modifies the child restraint or seatbelt, to prevent unbuckling, and may also impact on the person's safety if they cannot be quickly released from the vehicle seat in an emergency.

Further, once a child restraint or seatbelt is modified there may be other legal requirements that need to be complied with. For example, some states and territories require a medical certificate for the vehicle occupant to legally use a buckle cover on the road network.

MACA works with state and territory road agencies to improve timely access to seatbelt buckle covers, and to provide clarity regarding the legal requirements for their use in motor vehicles. This has already resulted in Queensland and the Northern Territory publishing improved legal requirements.

### Buckle release behaviours and impacts

Passengers who unbuckle their vehicle restraint may also demonstrate aggressive, self-injurious, or disruptive behaviour during car travel (Yonkman et al, 2013). In this situation the passenger, driver, other vehicle occupants and road users are at risk, as the person's behaviour may distract and interfere with the driver, increasing crash risk.

In some cases, having the buckle cover applied encourages the person to find another way to get out of the vehicle restraint. For example, when a buckle cover is used on the seatbelt, vehicle passengers find that they can lift the sash and/or lap part of the seatbelt away from their body and slip out from under the lap part of the seatbelt.

In addition, as many buckle covers need a key or other device to undo them, in the event of a crash or other emergency, the buckle cover may impact the person's safety if they cannot be easily released from their child restraint or seatbelt.

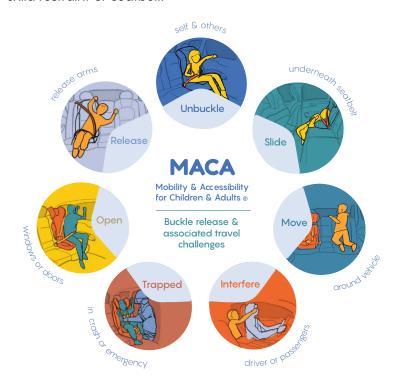


Table 1: Examples of buckle release behaviours and impacts

Examples	
Attempting to get out of child restraint or seatbelt	Interfering with other passengers
Unbuckling seatbelt	Moving around vehicle (passive)
Unbuckling child restraint	Moving around vehicle (aggressive)
Sliding underneath the seatbelt	Trying to open vehicle windows (passive)
Taking arms out of child restraint harness	Trying to open vehicle windows (aggressive, e.g., hitting)
Releasing arms from seatbelt	Trying to open doors of moving vehicle
Releasing other occupants' buckles	Driver distraction
Interfering with driver	Not able to be released from buckle cover in an emergency

Relevant standards and legislation include, but are not limited to:

#### 6.1. Australian Standards

### 6.1.1. AS/NZS 4370:2013 Restraint of children with disabilities. or medical conditions, in motor vehicles

This standard aimed to provide guidance for prescribers to assess the need and recommend the most suitable vehicle restraint option for a child with disability or medical condition (under 16 years) while travelling in a motor vehicle. When AS/NZS 4370:2013 was developed, there was a lack of research and knowledge about some of the restraint types and accessory products included in this standard, such as modified Australian standard car seats, special purpose car seats and specialty harness/vests.

This standard is now an aged standard, as it is over 10 years old. Since this standard was published in 2013, there have been significant advancements impacting on the ongoing relevance and need for this standard. This includes, for example, the introduction of the National Disability Insurance Scheme (2013) improving access to supports and products, the establishment of MACA and its Australian Safety Assessment Program (AuSAP), MACA's specialist training courses, new published research, and developments in Australian standards.

#### 6.1.2. AS 8005:2020 Accessories for child restraints for use in motor vehicles

The key principle of this voluntary standard (current version: 2020) is that accessories, such as buckle covers or cross-chest straps, must not compromise the safety of an AS/NZS 1754 compliant child restraint or increase the risk of injury to the child.

The standard outlines the design, construction, and performance of, and test methods for accessories and add-on devices to be used with child restraints, and accessories used to improve the comfort or fit of seatbelts when used with child restraints.

The AS 8005 is a voluntary standard; however, the Australian Capital Territory includes AS/NZS 8005 in its legislation (the impact of this is unclear).

There are currently no accessory buckle covers certified to AS 8005.



### 6.1.3. AS/NZS 1754 Child restraint systems for use in motor vehicles

Australia's child restraint standard provides minimum design, construction, and performance requirements for child restraint systems to provide a high level of protection for children travelling in motor vehicles.

AS/NZS 1754 is a voluntary standard, with some parts mandated (since 1978) by the Australian Competition and Consumer Commission (ACCC) in its Consumer Protection Notice No.3 of 2014 (for the sale and supply of car seats in Australia).[10] This notice ensures that child restraints supplied in Australia have key safety features considered appropriate to reduce the risk of injury to a child involved in a motor vehicle crash.

It is important to note that since October 2008, the ACCC has not mandated the relevant clauses of AS/NZS 1754 for the sale and supply of car seats for children with disability (this includes medical conditions), which allows special purpose car seats from overseas to be sold and supplied in Australia.

AS/NZS 1754:2024 was published 25 September 2024. This revised standard includes a new section to allow for variations to Australian standard car seats, to cater for the needs of children with disabilities and medical conditions.

Whilst the inclusion of the child restraint system needs for children with disabilities is a significant advancement, it will rely on product manufacturers investing in the development of such products.

#### 6.1.4. AS 5384 Accessories for seat belts for use in motor vehicles

Published in September 2023, this new voluntary standard addresses the design, safety, and performance of accessory devices used with vehicle seatbelts. This includes postural support devices, such as specialty harnesses and vests. It outlines requirements for crash testing, labelling, and packaging.

This standard is a significant advancement as previously no Australian standard existed for postural support devices. MACA is promoting this standard to industry to encourage the development and supply of products that meet this new standard.

#### 6.1.5. National Disability Insurance Scheme Act 2013, Section 34

The NDIS funds a range of supports and services including assistive technology. This includes vehicle restraint systems, and in some cases, modified Australian standard child restraints. However, for the NDIS to consider the request as a reasonable and necessary support all the following criteria must be met, including:

Section 34 Reasonable and necessary supports

- (1) For the purposes of specifying, in a statement of participant supports, the general supports that will be provided, and the reasonable and necessary supports that will be funded, the CEO must be satisfied of all the following in relation to the funding or provision of each such support:
  - (a) the support will assist the participant to pursue the goals, objectives and aspirations included in the participant's statement of goals and aspirations
  - (b) the support will assist the participant to undertake activities, so as to facilitate the participant's social and economic participation
  - (c) the support represents value for money in that the costs of the support are reasonable, relative to both the benefits achieved and the cost of alternative support
  - (d) the support will be, or is likely to be, effective and beneficial for the participant, having regard to current good practice
  - (e) the funding or provision of the support takes account of what it is reasonable to expect families, carers, informal networks and the community to provide
  - (f) the support is most appropriately funded or provided through the National Disability Insurance Scheme, and is not more appropriately funded or provided through other general systems of service delivery or support services offered by a person, agency or body, or systems of service delivery or support services offered:
    - (i) as part of a universal service obligation; or
    - (ii) in accordance with reasonable adjustments required under a law dealing with discrimination on the basis of disability.
- (2) The National Disability Insurance Scheme rules may prescribe methods or criteria to be applied, or matters to which the CEO is to have regard, in deciding whether or not he or she is satisfied as mentioned in any of paragraphs (1)(a) to (f).

#### 6.1.6. NDIS (Restrictive Practice and Behaviour Support) Rules 2018

The NDIS (Restrictive Practices and Behaviour Support) Rules 2018 (Behaviour Support Rules) apply to all registered NDIS providers who use restrictive practices in the course of delivering NDIS supports. The rules set out conditions relating to the regulation of specified restrictive practices, including:

- seclusion
- chemical restraint
- physical restraint
- environmental restraint
- mechanical restraint.

#### Mechanical restraint

The Behaviour Support Rules (NDIS, 2018) define mechanical restraint as:

the use of a device to prevent, restrict, or subdue a person's movement for the primary purpose of influencing a person's behaviour but does not include the use of devices for therapeutic or non-behavioural purposes.

The NDIS Quality and Safeguards Commission in its Restrictive Practice Guide, Safe Transportation (NDIS, 2023) notes that this definition applies to safe transportation. However, the guide also notes that some devices, products and strategies are considered reasonable measures when used in transportation by the NDIS Commission, and do not require reporting. This includes seatbelt buckle covers, and in some cases postural harnesses/vests.

The NDIS Quality and Safeguards Commission's position on the use of seatbelt buckle covers in motor vehicles may differ from some state and territory requirements which consider the use of a seatbelt buckle cover for managing behaviours of concern a restrictive practice. Refer to the relevant state or territory responsible agency for advice.





### 7. Definitions

Assistive Technology Advisors: people with a recognised qualification in assistive technology advice, for example continence nurses, occupational therapists, orthoptists, assistive technology mentor, physiotherapists, podiatrists, speech pathologists, rehabilitation engineers.

NOTE: The Operational Guidelines | NDIS note that sometimes the participant's medical practitioner or specialist may have enough assistive technology experience to provide advice on what is needed. But they will usually refer to a more experienced assistive technology advisor. The guidelines also note that an assessment may be needed from an assistive technology assessor.

Assistive Technology Assessor: are specialist assistive technology advisors. The difference is that they have a university or equivalent degree relevant for providing assistive technology assessments, and work within the standards set by a professional registration organisation, such as the Australian Health Practitioner Regulation Agency (AHPRA).

Assistive technology: equipment or devices that help a person do things they can't do because of a disability. Assistive technology may also help a person do something more easily or safely (NDIS, n.d).

Child restraint buckle cover: an accessory product that is placed over the top of the buckle release on the built-in harness of a child restraint (Appendix 1).

Seatbelt buckle cover: an accessory product that is placed over the top of the vehicle seatbelt buckle to prevent the occupant from accessing the seatbelt's release button (Appendix 1).

Behaviours of concern: (or challenging behaviour) behaviours of concern are those of such intensity, frequency or duration that the physical safety of the person or others is likely to be placed in serious jeopardy, or behaviour which is likely to seriously limit the use of, or result in, the person being denied access to ordinary community facilities.

Heavy vehicle: a vehicle that has a gross vehicle mass (GVM) or aggregate trailer mass (ATM) of more than 4.5 tonnes, which includes passenger buses.

Light vehicle: a motor vehicle with an GVM not exceeding 4.5 tonnes.

Mechanical restraint: the use of a device to prevent, restrict, or subdue a person's movement for the primary purpose of influencing a person's behaviour but does not include the use of devices for therapeutic or non-behavioural purposes (NDIS, 2023).

Modified car seat: a child restraint that includes accessories, postural supports, and/or additional padding that are not provided with the child restraint, and are not included in the child restraint manufacturer's instructions for use (Standards Australia, 2013).

### 7. Definitions

Prescriber: a health professional with specialist training in assessing and prescribing for the motor vehicle transport needs of people with disabilities and medical conditions. This includes an occupational therapist, physiotherapist, medical practitioner, and rehabilitation engineer.

Restrictive practice: any practice or intervention that has the effect of restricting the rights or freedom of movement of a person with disability, with the primary purpose of protecting the person (NDIS, 2013).

\*\*Some devices might, or might not, be a mechanical restraint depending on why they are being used. It is not the use of a device itself that requires authorisation, but its use as a mechanical restraint to manage behaviour. The key point being the purpose or intention of using the device.

Safe System approach: this approach is based on an ethical position where it can never be acceptable that people are seriously injured or killed on the network. It provides a set of design and operating principles to guide action on the journey to the long-term elimination of death and serious injuries on our roads.





#### The Safe System

The five pillars of the Safe System, as shown in the image, operate in harmony to reduce fatalities and serious injuries. It is intended to be an inclusive approach that caters for all groups using the road system. [10]

The principles of a safe system approach are:

Human fallibility: we all make mistakes on the road.

Human vulnerability: people are physically frail with limited ability to tolerate the forces in a crash.

Forgiving system: a road transport system must be 'forgiving' of mistakes within these limitations.

Shared responsibility: the responsibility for road safety is shared by system designers, maintenance, decision-makers and road operators and users.

### 8. Procedures

### 8.1. Prescribers are responsible for:

- undertaking specialist training relating to transporting people with disabilities and medical conditions, such as MACA's specialist <u>training</u> course.
- assessing and prescribing for a person's motor vehicle restraint needs in accordance with best practice.
- complying with relevant regulatory and legislative requirements.
- providing information to parents/guardians about their legal responsibilities when transporting a person in a motor vehicle that is using a child restraint or seatbelt buckle cover, this includes:
  - · providing the parent/guardian with an Advice to Parent/Client form.
  - providing, where required by law, the parent/guardian with a medical practitioner referral letter to obtain a medical certificate for legal use of the child restraint or seatbelt buckle cover.
  - providing, where required by law, the parent/guardian with information to assist with complying with vehicle standards requirements.
- educating parents/guardians on the use of the child restraint or seatbelt buckle cover, this includes:
  - advising that some users can easily undo buckle covers or may attempt to get out of the child restraint or vehicle seat, for example by sliding under the lap part of the seatbelt. This is a significant road safety risk and requires urgent follow-up.
  - advising that an additional person may need to assist in the vehicle for the first few trips
    to minimise road safety risks and driver distraction. If this is not possible it is recommended
    the parent/guardian choose travel routes that enable the vehicle to be pulled over quickly if
    needed (i.e., avoid freeways and high-speed roads).
  - · advise that a seatbelt cutter should be kept in the vehicle in case of an emergency.
- regularly reviewing the child's transport needs and updating the person's Motor Vehicle Transport Plan (refer to the MACA Guide).
- keeping up to date with current research, laws, and best practice for the transport of people with disabilities and medical conditions in motor vehicles.
- · maintaining appropriate documentation.

### 8.2. Parents/guardians are responsible for:

- complying with relevant laws when using a child restraint or seatbelt buckle cover for an occupant when travelling in a motor vehicle (e.g., carrying a medical certificate in the vehicle).
- ensuring other drivers transporting the person using the child restraint or seatbelt buckle cover are provided with the required education and documentation for legal use of a buckle cover.
- ensuring other drivers are advised of what to do in an emergency, and, where required, supplying the driver with a seatbelt cutter.
- notifying the allied health professional if the person using the child restraint or seatbelt buckle cover continues to be able to get out of the child restraint or seatbelt, or any other associated behaviours of concern.

### 8. Procedures

### 8.3. Organisations are responsible for:

- ensuring staff have undertaken specialist training relating to transporting people with disabilities and medical conditions in motor vehicles.
- ensuring Work, Health and Safety obligations are met where staff are responsible for transporting vehicle occupants using child restraint and/or seatbelt buckle covers.
- · complying with relevant regulatory and legislative requirements.
- · ensuring that relevant policies and procedures are shared with staff, and regularly reviewed.

# 9. Appendices

- · Appendix 1: Buckle covers
- · Appendix 2: Legal requirements for the use of buckle covers
- · Appendix 3: FAQs

### 10. Authorisation

This policy was adopted by [insert name of organisation] on [insert date].

## 11. Policy review date

This policy will be reviewed by [insert name of organisation] on [insert date].

(MACA recommends that the policy is reviewed annually or more frequently in response to legislative and/or other changes and new products. MACA updates this model policy in response to changes, so please visit <a href="https://www.macahub.org/resources/policies">https://www.macahub.org/resources/policies</a> to access the latest version).

# 12. Acknowledgement

This policy was developed by MACA in consultation with parents, allied health professionals, Autism Spectrum Australia and Autism Queensland Limited.

# 13. Resources and training

There are a range of resources available to assist in guiding prescribing practice. This includes:

#### The MACA Guide

The guide is Australia's leading assessment and prescribing resource. It is designed for MACA trained professionals and assists with clinical reasoning and decision-making when assessing and prescribing for motor vehicle transport needs.

#### MACA's online training courses

#### Transporting children with disabilities and medical conditions

Designed for allied health professionals to build knowledge and confidence in assessing and prescribing for children's motor vehicle transport needs.

CPD: nine hours

#### Leadership in supporting the transport needs of children with disability

Designed for product suppliers and service organisations to develop confidence and leadership in product supply.

CPD: six hours

#### Workplace road safety leadership course

Designed to assist organisations in the care sector to manage vehicle-related risks in the workplace and influence their organisation to adopt a culture of workplace road safety.

CPD: six hours

#### NDIS Quality and Safeguards Commission, Restrictive Practice Guide, Safe Transportation [12]

This guide aims to assist in identifying regulated restrictive practices during transportation.

The NDIS Quality and Safeguards Commission requirements relating to regulated restrictive practices need to be considered along with relevant state and territory requirements.



### References

Black, M. H., Falkmer, T., Hayden-Evans, M., Lindner, H., Clarkson, E., Vale, L., Picen, T., Kuzminski, R., & McGarry, S. (2024). Safe Transportation of Children With Disabilities and Medical Conditions in Motor Vehicles: Experiences and Perspectives of Australian Health Professionals and Organisations. Journal of Road Safety, 35(1), 15-26.

Mobility and Accessibility for Children in Australia and La Trobe University Centre for Technology Fusion 2021, Buckle release: inspiring innovation to improve road safety for children with disability and their families, unpublished project report.

NDIS (n.d), Assistive technology explained, accessed 27 March 2025

NDIS Quality and Safeguards Commission (2023). Restrictive Practice Guide: Safe Transportation (Version 2). Penrith, Australia: NDIS Quality and Safeguards Commission.

Yonkman J, Lawler B, Talty J, O'Neil J, Bull M, 2013 Safely transporting children with autism spectrum disorder: evaluation and intervention. Am J Occup Ther. Nov-Dec; 67(6):711-6.

### **Standards**

AS 5384, 2023. Accessories for seat belts used in motor vehicles.

AS 1753. 2022, Webbing for restraining devices for occupants of motor vehicles.

AS 2596. 2022, Seatbelt assemblies for motor vehicles.

AS/NZS 1754. 2013, Child restraint systems for use in motor vehicles.

## Regulations

National Disability Insurance Scheme Act 2013, section 34, accessed 27 March 2025

National Disability Insurance Scheme (Restrictive Practice and Behaviour Support) Rules 2018, accessed 27 March 2025

# Appendix 1

#### **Buckle covers**

Seatbelt buckle covers are assistive technology accessory products that are placed over the top of the vehicle seatbelt buckle to prevent the occupant from accessing the seatbelt's release button.

Child restraint buckle covers are assistive technology accessory products that are placed over the top of the buckle release on the built-in harness of a child restraint.

Many products on the market require the use of a tool or key to release the buckle cover. However, more recent products have evolved in response to keyless car entry and provide solutions that, for instance, use the neighbouring buckle tongue to release the seatbelt buckle cover (e.g., Buckle Boss).

Some products facilitate release without need for a key/tool. For example, the Seatbelt Buckle Guard Pro uses a 'push-turn' screw cap to prevent children from opening. Other seatbelt buckle covers, such as BuckleSafe, feature the use of a sliding mechanism.

#### Seatbelt buckle covers

Note: Since the initial review in 2020 there has been a significant increase in the cost of most seatbelt buckle covers available in the market.

Brand	lmage	Manufacturer	Video Demonstration	Approx Price	Australian Standards Compliance	Comments
Buckle Boss	To Release Puth any alim object into open alor above. Pat. No. US 6.332,232 III  2024  202	Available from many retailers	<u>Video</u>	Various	No	This buckle cover can be opened with an adjacent seatbelt.  2024: The Buckle Boss website no longer includes the product listed first, however appears to be available from other sellers.  Buckle Boss have introduced a number of new products to their range.  See below for additional Buckle Boss product.

# Appendix 1 (cont)

## Seatbelt buckle covers

Brand	lmage	Manufacturer	Video Demonstration	Approx Price	Australian Standards Compliance	Comments
Buckle Boss	WWW.Buckleboss.4	<u>Website</u>	N/A	\$21.43	No	This product is available as a 3D printed option, however the product reviewed was fragile and already coming apart at the side.
Buckleroo	BuckleRoom	Available from many retailers	<u>Video</u>	\$22.12	No	
BuckleSafe		Available from many retailers	<u>Video</u>	\$39.95	No	Uses a sliding method for installation an release.
FAS Therapeutic	NEST ID IN S.DT PART O PLEASE	<u>Website</u>	N/A	\$89 (Note: increased from \$65 in 2022)	No	Requires a key (or similar size probe) to open.  Comes with seatbelt cutter, wedge spacer, and warning sticker for vehicle.

# Appendix 1 (cont)

## Seatbelt buckle covers

Brand	lmage	Manufacturer	Video Demonstration	Approx Price	Australian Standards Compliance	Comments
Houdini Click n Lock	cite suppose	<u>Website</u>	<u>Video</u>	\$15 NZD	No	Provides misleading information regarding compliance with Australian standards on its packaging.
Hurphy Durphy	The state of the s	Available from many retailers	<u>Video</u>	\$24.99	No	Product is made from soft fabric and Velcro.
McNaughton Incorporated		<u>Website</u>	<u>Video</u>	Refer to website	No	Amazon user reviews report that the cap mechanism is not always reliable.
Mobility Engineering	Contraction of the state of the	<u>Website</u>	<u>Video</u>	\$159 (Note: increased from \$150 in 2024)	No	Requires a key (or similar size probe) to open. Supplied with seatbelt cutter and warning stickers for vehicles.
Morlike	Constitution of the second of	Available from many retailers	<u>Video</u>	\$31.50	No	

# Appendix 1 (cont)

### Seatbelt buckle covers

Brand	lmage	Manufacturer	Video Demonstration	Approx Price	Australian Standards Compliance	Comments
Safety Buckle Pro	G SAFET TENE	Available from many retailers	N/A	\$20.25	No	
Securiseat		<u>Website</u>	N/A	€51.90 (euro)	No	
Seatbelt Extender Pro		<u>Website</u>	<u>Video</u>	\$12.99 USD	No	Comes in a pack of two

### Child restraint buckle covers

Brand	lmage	Manufacturer	Video Demonstration	Approx Price	Australian Standards Compliance	Comments
Buckle-upp	Industry Control of the Control of t	<u>Website</u>	<u>Video</u>	Refer to site	No	Available in three colours
Merritt		Website	<u>Video</u>	Refer to site	No	This product does not fit all child restraint buckle types

Note: This list is a selection of available products at the time of publication and is not intended to be an exhaustive list of all available seatbelt buckle covers in the market. References to any specific product, brand or website does not constitute an endorsement or recommendation by MACA based on the quality of a product or affiliation to a brand.

# Appendix 3

### Legal requirements for the use of buckle covers

The use of a child restraint buckle cover modifies a child restraint. This means the child restraint no longer meets state or territory road laws and there are requirements that must be met for legal use in a motor vehicle.

The use of a seatbelt buckle cover may impact on road laws, and/or 'modify' the seatbelt impacting on the vehicle's compliance with vehicle standards.

This appendix provides an overview of the requirements in each state and territory for the legal use of child restraint and seatbelt buckle covers, when travelling in a motor vehicle.

Some states and territories do not have adequate legislation and processes in place to guide the legal use of buckle covers. MACA understands this impacts on safety and makes it difficult for families and carers to comply with laws. It is also challenging for organisations and allied health professionals to meet their professional obligations. MACA is continuing to work closely with each state and territory to address this.

Further, MACA continues to engage with the National Heavy Vehicle Regulator regarding Vehicle Standards Exemption requirements for the use of seatbelt buckle covers in heavy vehicles (e.g., buses).

This document is regularly updated to reflect changes to relevant laws. However, if you need assistance, please get in touch: contact@macahub.org.

### Exemption requirements for the legal use of buckle covers

#### Child restraint buckle covers

State/Territory	Under 16 Years	16 Years and Over
Australian Capital Territory	Medical certificate	Medical certificate
New South Wales	Medical certificate	Medical certificate
Northern Territory	Medical certificate	Medical certificate
Queensland	Advice to Parent form* or Medical certificate	Medical certificate
South Australia	Medical certificate	Medical certificate
Tasmania	Medical certificate and exemption from the Department of State Growth To obtain an exemption: Email: tse@stategrowth.tas.gov.au Tel: 1300 135 513	Medical certificate and exemption from the Department of State Growth To obtain an exemption: Email: tse@stategrowth.tas.gov.au Tel: 1300 135 513
Victoria	Medical certificate	Medical certificate
Western Australia	Advice to Parent form* and Medical certificate (to confirm diagnosis) or Medical certificate	Medical certificate

<sup>\*</sup> An Advice to Parent form only applies to the requirements of that state therefore a medical certificate is required where the person travels interstate.

# Exemption requirements for the legal use of buckle covers

## Seatbelt buckle covers (all ages)

State/Territory	Requirements
Australian Capital Territory	Application required.
	Contact the Vehicle Inspection and Technical Unit, Access Canberra
	Email: vitu@act.gov.au or
	Tel: 02 6207 7236
New South Wales	· Medical certificate, with manufacturer's instructions attached.
	More information: Vehicle Standards Information 49
Northern Territory	No application required.
	· 'Seatbelt Advice Form' (either an Advice
	to Parent form or medical certificate)
	Manufacturer's instructions
	More information: Information Sheet
Queensland	· 'Prescriber's certificate' issued by a 'specialist' (doctor, occupational
	therapist, psychologist, physiotherapist or biomedical engineer)
	MACA recommends use of the following for the prescriber's certificate:
	<ul><li>Advice to Parent form (under 16 years)</li><li>Advice to Client form (16 years and over)</li></ul>
	More information: Safe Movement Guideline
South Australia	Medical certificate
odan Addirand	(this may change as SA vehicle standards requirements are under review)
Tasmania	Application required.
	Email tse@stategrowth.tas.gov.au to obtain an exemption.
	Provide the following:
	Advice to Parent form (under 16 years)  Advice to Clarat form (16 years)
	Advice to Client form (16 years and over)     Medical certificate
Viotoria	Medical certificate
Victoria	
Western Australia	Application required.
	Complete Form E82 (fees waived)
	Submit to vsp@transport.wa.gov.au together with:
	Advice to Parent form (under 16 years)
	Advice to Client form (16 years and over)
	Medical certificate

# Appendix 3

#### **FAQs**

#### Do buckle covers comply with the Australian Standard AS 8005?

MACA has reviewed child restraint and seatbelt buckle covers available in Australia and on-line. The review found that no buckle cover complies with the Australian accessory standard (AS 8005). This voluntary standard was introduced in 2013, and updated in 2020.

The standard specifies requirements for the design, construction and performance of, and test methods for, accessories and add-on devices to be used with child restraints, and accessories used to improve the comfort or fit of seatbelts when used with child restraints.

NOTE: Seatbelt buckle covers are now included in the new AS 5384 standard and will be removed from AS 8005 when next reviewed.

#### Do buckle covers fit all child restraints/seatbelts?

No. Buckle covers do not fit some child restraint and seatbelt buckle types. Therefore, if you are purchasing a product, we recommend providing the make and model of the child restraint and/or vehicle to the supplier to seek confirmation of compatibility.

#### How are buckle covers fitted to the seatbelt or child restraint?

This depends on the design of the buckle cover. Some products slide easily over a seatbelt, whereas others use Velcro and "wrap" around the seatbelt or child restraint buckle. Many buckle covers need a tool or key for release which manufacturers recommend keeping in the vehicle the person is travelling in.

#### What should I tell a parent/carer to do in an emergency when their child or client is using a buckle cover?

If you are unable to find the tool or key for release, use a seatbelt cutter. Some manufacturers provide a seatbelt cutter with the buckle cover. If not, we recommend you advise the parent/carer to purchase a seatbelt cutter to be kept in the vehicle (low cost and available online).

#### Where can you buy buckle covers?

Buckle covers are readily available from mainstream shopfronts, disability product suppliers and online. Some brands are only available from overseas disability equipment suppliers (e.g., Merritt).

#### Is it legal to use a buckle cover in a motor vehicle?

States and territories in Australia have different requirements for the legal use of child restraint and seatbelt buckle covers. Refer to Appendix 2 and MACA's website for more information.

#### Is there a risk the vehicle passenger will remove the buckle cover while the vehicle is moving?

Yes. Parents/carers report that some vehicle occupants can easily remove buckle covers. Therefore, it is important when the buckle cover is first used that an additional person is available to assist in the car for the first few trips. Due to the risks associated with using buckle covers it is recommended travel routes are selected that enable the vehicle to be pulled over quickly if needed (i.e., avoid freeways and high-speed roads).

#### What is the recommended review period for the use of a buckle cover?

Due to the risks associated with using buckle covers a short review period to monitor the effectiveness of the buckle cover is recommended.

# Appendix 3

#### **FAQs**

#### What are the risks of using buckle covers?

There are potential risks associated with using buckle covers which may impact on the safety of the person using the buckle cover, the driver, other vehicle occupants and road users. For example, some products are easy for some passengers to remove (not fail-proof); and some users may continue to attempt to get out of their seatbelt (when using a seatbelt buckle cover) by sliding under the lap part of the seatbelt. Further, in an emergency, it may be difficult to quickly release the person from the vehicle.

However, these risks can be managed by ensuring you have policies and processes in place to guide your practice, for example trialling different products with the client, regularly reviewing the person's transport needs, and providing parent/carer education.

#### Where can I learn more about assessing and prescribing for children's transport needs?

MACA offers specialist online training: Transporting children with disabilities and medical conditions in motor vehicles. For more information and to enrol visit here.

What is MACA doing to improve knowledge about products used when transporting people with disabilities and medical conditions?

MACA is committed to advancing the rights of people with disabilities and medical conditions to safe and equitable transport.

With funding support from the Transport Accident Commission (Victoria), MACA established the Australian Safety Assessment Program (AuSAP). This program is supported in-kind by Britax Childcare Pty Ltd, and Neuroscience Research Australia (Transurban Road Safety Centre) and Transport for NSW (Safer Vehicles and Crashlab). AuSAP independently assesses specialty restraint systems used by people with disabilities and medical conditions.

Visit MACA's national product register for more information

#### What research has MACA undertaken in relation to buckle covers?

In 2020/21 MACA and La Trobe University received funding from the Commonwealth Office of Road Safety, Road Safety Innovation Fund. This project found that complete vehicle safety solutions are needed to respond to buckle release challenges.





We pay respect to the Traditional Custodians of all lands, past, present & future. Honouring Elders & nurturing all young people.

