

self & others



Unbuckle

underneath seatbelt



Slide

release arms



Release

Buckle release & associated travel challenges



Move

around vehicle



Interfere

driver or passengers



Trapped

in crash or emergency



Open

windows or doors

MACA LTD

Mobility & Accessibility
for Children in Australia

**Model
Policy**

Buckle covers - model policy

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

Version 4

January 2023

1. Introduction

Buckle covers are a low-cost, higher-risk assistive technology¹ usually prescribed for children 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. Even though these devices are often needed, there's a lack of research and knowledge about their safety, features and appropriate use. [1] This presents an unacceptable road safety risk for children and their families, and other people transporting children with disabilities and/or behaviours of concern (e.g., carers, employees). In addition, this situation impacts organisations' and allied health professionals' ability to appropriately support families. [2]

This model policy has been developed by Mobility and Accessibility for Children in Australia 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.

2. Purpose

The Buckle Cover Model Policy aims to:

- provide knowledge and guidance for employers and allied health professionals on best practice approaches and legal requirements for prescribing child restraint and seatbelt buckle covers for use in motor vehicles

¹ The NDIS *Assistive Technology Product Risk Table* classifies "mobility and postural support or correction devices", "motor vehicle adaptations", 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". [13]

- support the rights of children 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 children in motor vehicles.

3. Values

[insert name of organisation] is committed to:

- applying family-centred practice
- a best practice approach to supporting the rights of children 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 in motor vehicles (in line with work health and safety (WHS) laws)
- reducing or eliminating restrictive practice for children with disability.

4. Scope

This policy sets out considerations for organisations and allied health professionals prescribing child restraint and seatbelt buckle covers for children under the age of 16 years, in accordance with *AS/NZS 4370:2013 Restraint of children with disabilities, or medical conditions, in motor vehicles*, research and best practice. [3]

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 child 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. [4]

This review 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 children to remove (not fail-proof)
- seatbelt buckle covers may introduce additional risks – such as the child attempting to get out by sliding under the lap part of the seatbelt

- parents 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 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 child’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 are additional legal requirements that must be complied with. For example, some states and territories require a medical certificate to legally use a buckle cover on the road network. More recently MACA has worked with states and territories to improve timely access to seatbelt buckle covers and to provide greater clarity regarding the legal requirements for their use in motor vehicles. This has already resulted in Queensland and the Northern Territory proactively publishing improved legal requirements. MACA continues to work with other states and territories.

5.1. Buckle release behaviours and impacts

Often children who unbuckle their vehicle restraint demonstrate aggressive, self-injurious, or disruptive behaviour during car travel. In this situation the driver, other vehicle occupants and road users are at risk, as the child’s behaviour may distract and interfere with the driver, increasing crash risk.

In some cases, having the buckle cover applied encourages the child to find another way to get out of the vehicle restraint. For example, when a buckle cover is used on the seatbelt, children 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 child’s safety if they cannot be easily released from their child restraint or seatbelt.

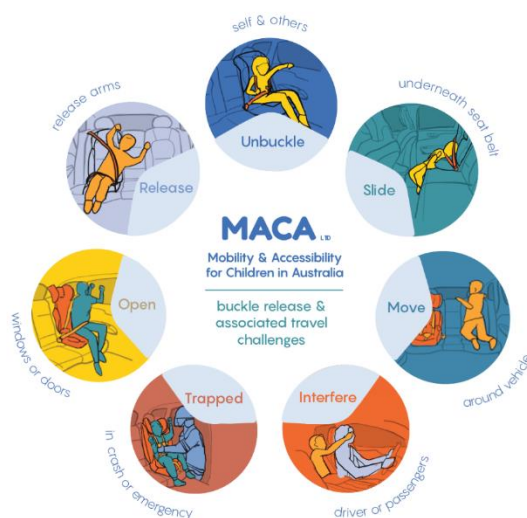


Table 1: Examples of buckle release behaviours and impacts

Examples
Child attempting to get out of child restraint or seatbelt
Child unbuckling seatbelt
Child unbuckling child restraint
Child sliding underneath the seatbelt
Child taking arms out of child restraint harness
Child releasing arms from seatbelt
Child releasing other occupants' buckles
Child interfering with driver
Child interfering with other passengers
Child moving around vehicle (passive)
Child moving around vehicle (aggressive)
Child trying to open vehicle windows (passive)
Child trying to open vehicle windows (aggressive, e.g., hitting)
Child trying to open doors of moving vehicle
Driver distraction
Child not able to be released from buckle cover in an emergency

6. Standards and Legislation

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 [3]

This standard aims to enable prescribers to assess the need and recommend the most suitable restraint option for a child (16 years and under) with a disability or medical condition, while travelling in a motor vehicle.

Prescribers include AHPs such as occupational therapists, physiotherapists, medical practitioners, rehabilitation engineers.

AS/NZS 4370 is a **voluntary standard**, however several jurisdictions (ACT, Queensland, WA and NT) either include AS/NZS 4370 in their legislation, or other legal instruments.

This standard has been approved for review by Standards Australia and work is expected to commence in 2023.

6.1.2. AS 8005:2020 Accessories for child restraints for use in motor vehicles [4]

The key principle of AS 8005 is that accessories do not compromise conformance of an Australian standard (AS/NZS 1754) car seat or increase the risk of injury for the child.

The AS 8005 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. Section 10 of AS 8005 specifies the requirements for child restraint buckle covers and seatbelt buckle covers.

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).

The standard's intent is that buckle covers should not impinge on the ability of an adult finger or thumb to be inserted to release the child restraint or seatbelt buckle.

No manufacturer has made a buckle cover that complies with AS 8005, therefore the standard has not been tested, and further research is needed to determine whether AS 8005 is sufficient to ensure good safety performance of buckle covers.

Note: an accessory that is added on, and not provided with an Australian standard car seat, or does not comply with AS 8005, modifies the restraint.

6.1.3. AS/NZS 1754 Child restraint systems for use in motor vehicles [6]

This standard (currently under review) was introduced in 1973 and is widely recognised as the most stringent child restraint standard in the world. Until recently it was the only standard requiring side impact testing. AS/NZS 1754 aims to ensure that child restraints have key safety features that reduce the associated risks of injury to/death of a child while travelling in a motor vehicle.

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 child restraints in Australia). [7] 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 child restraints for children with disability (this includes medical conditions), which allows special purpose car seats from overseas to be sold and supplied in Australia.

This standard is currently under review and is considering new requirements to allow limited variations to Australian standard car seats to cater for the needs of children with disabilities and medical conditions.

6.1.4. National Disability Insurance Scheme Act 2013, Section 34

The NDIS funds a range of supports and services, which includes assistive technology - such as buckle covers. However, for the NDIS to consider the request as a reasonable and necessary support all the following criteria must be met:

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). [11]

6.1.5. 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 defines 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](#) 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.

The NDIS Quality and Safeguards Commission's position on the use of seatbelt buckle covers in motor vehicles is not the same as 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.

NOTE: The NDIS advised MACA in December 2022 that the [Restrictive Practice Guide, Safe Transportation](#) is currently under review. MACA will update this policy if any changes are made to the guide.

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 [NDIS Assistive Technology Operational Guidelines](#) note that sometimes the participants 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. [12]

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. [8]

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. [9]


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. [3]

Prescriber: the person or persons responsible for assessing an individual child’s needs and prescribing the way in which a child with a disability or medical condition should be transported in a motor vehicle. For example, an occupational therapist, physiotherapist, medical practitioner, rehabilitation engineer. [3]

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. [9]

****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.

<p>The Safe System</p> 	<p>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]</p> <p>The principles of a safe system approach are:</p> <p>Human fallibility: we all make mistakes on the road.</p> <p>Human vulnerability: people are physically frail with limited ability to tolerate the forces in a crash.</p> <p>Forgiving system: a road transport system must be ‘forgiving’ of mistakes within these limitations.</p> <p>Shared responsibility: the responsibility for road safety is shared by system designers, maintenance, decision-makers and road operators and users.</p>
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8. Procedures

8.1. Allied health professionals are responsible for:

- undertaking training relating to transporting children with disabilities and/or behaviours of concern in motor vehicles.
- assessing and prescribing for children’s motor vehicle restraint needs in accordance with best practice.
- complying with relevant regulatory and legislative requirements for restrictive practice.
- providing information to parents/guardians about their legal responsibilities when their child is using a child restraint and/or seatbelt buckle cover, this includes:
 - providing the parent/guardian with the Advice to Parent form. [3]

- providing, where required by law, the parent/guardian with a medical practitioner referral letter to obtain a medical certificate for legal use of the buckle cover when travelling in a motor vehicle.
 - 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 a buckle cover and associated risks:
 - advise that some children 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.
 - to minimise road safety risks and driver distraction, where possible, advise that an additional person assist in the vehicle for the first few trips. If the parent is unable to have this support it is recommended the parent 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 the child travels in case of an emergency.
- regularly reviewing the child's transport needs and updating the child's Motor Vehicle Transport Plan (refer to the [MACA Guide](#)).
- keeping up to date with current research, laws and best practice approaches to managing buckle release.
- maintaining appropriate documentation.

8.2. Parents/guardians are responsible for:

- complying with relevant laws when using a child restraint and/or seatbelt buckle cover (e.g., carrying Advice to Parent form in the vehicle).
- ensuring other drivers transporting their child 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 child continues to be able to get out of the child restraint or seatbelt, or any other associated behaviours of concern.

8.3. Organisations are responsible for:

- ensuring, so far as reasonably practicable, the health and safety of staff and the people they transport in motor vehicles by implementing a robust system to manage road traffic risks associated with buckle release.
- promoting a safety culture, including raising awareness of road traffic as a significant hazard and consulting with workers in the development of an effective road traffic safety management system.
- documenting and implementing road traffic safety policies and procedures that are shared with all staff, and regularly reviewed.

- supporting staff with training in transporting children with disabilities and/or behaviours of concern in motor vehicles.
- complying with relevant regulatory and legislative requirements.

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 will also update this model policy in response to changes, so please visit <https://www.macahub.org/resources/policies> 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

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

The MACA Guide

The guide, published August 2022, assists with clinical reasoning and decision-making when working with families. It helps with the selection of appropriate vehicle restraint products and strategies to support the child's motor vehicle transport needs. The MACA Guide is provided free to participants who have completed MACA's online [training](#) *Transporting children with disabilities and medical conditions*.

NDIS Quality and Safeguards Commission, Restrictive Practice Guide, Safe Transportation

This [guide](#) (currently under review) published February 2022, 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.

14. References

1. Neuroscience Research Australia and Kidsafe Australia: Best Practice Guidelines for the Safe Restraint of Children Travelling in Motor Vehicles, 2nd Edition. Sydney: 2019
2. Angela Downie, Angela Chamberlain, Rebecca Kuzminski, Sharmila Vaz, Belinda Cuomo & Torbjörn Falkmer (2019): Road vehicle transportation of children with physical and

behavioural disabilities: A literature review, Scandinavian Journal of Occupational Therapy, DOI:10.1080/11038128.2019.1578408

3. Standards Australia, Australian/New Zealand Standard 4370:2013 Restraint of children with disabilities, or medical conditions, in motor vehicles
4. Standards Australia, Australian Standard AS 8005:2020 Accessories for child restraints used in motor vehicles
5. Janell Yonkman, Bryanna Lawler, Judith Talty, Joseph O'Neil, Marilyn Bull (2013): Safely Transporting Children with Autism Spectrum Disorder: Evaluation and Intervention. American Journal of Occupational Therapy, 67, 711-716.
<http://dx.doi.org/10.5014/ajot.2013.008250>
6. Standards Australia, Australian/New Zealand Standard 1754:2013 Child restraint system for use in motor vehicles
7. <https://www.legislation.gov.au/Details/F2014L01252>
8. NDIS Quality and Safeguards Commission, Behaviour Support Questions and Answers, June 2019
9. National Disability Insurance Scheme Quality and Safeguards Commission website, <https://www.ndiscommission.gov.au/regulated-restrictive-practices>
10. Australian Government, The Department of Infrastructure, Transport, Regional Development and Communications, National Road Safety Strategy 2011-2020, available at [National Road Safety Strategy 2021-30 | National Road Safety Strategy](#)
11. National Disability Insurance Scheme Act, <https://www.legislation.gov.au/Details/C2022C00206> accessed 22 August 2022.
12. <https://ourguidelines.ndis.gov.au/supports-you-can-access-menu/equipment-and-technology/assistive-technology/what-do-we-mean-assistive-technology>, accessed 22 August 2022.
13. <https://ourguidelines.ndis.gov.au/supports-you-can-access-menu/equipment-and-technology/assistive-technology/assistive-technology-product-risk-table> accessed 11 August 2022.

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; whilst the Lilli Blossom child restraint buckle cover uses a Velcro cover to limit the release of the buckle.

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	IMAGE	MANUFACTURER	VIDEO DEMONSTRATION	APPROX. PRICE	AUSTRALIAN STANDARDS COMPLIANCE	COMMENTS
Buckle Boss		Here	Buckle Boss	\$20.01 Price increase to \$52.49	No	This buckle cover can be opened with an adjacent seatbelt.
Buckle Boss		Here	N/A	\$21.43	No	This product is available as a 3D printed option, however the product we reviewed was fragile and already coming apart at the side.

BRAND	IMAGE	MANUFACTURER	VIDEO DEMONSTRATION	APPROX. PRICE	AUSTRALIAN STANDARDS COMPLIANCE	COMMENTS
Buckleroo		Available from many retailers	Buckleroo	\$22.12	No	
BuckleSafe		Available from many retailers	Here	\$39.95	No	
FAS Therapeutic		Here	N/A	\$65 (Note: increased to \$89 in 2022)	No	Requires a key (or similar size probe) to open. Comes with seatbelt cutter, wedge spacer, and warning sticker for vehicle.
Houdini Click n Lock		Here	N/A	\$24.95	No	Provides misleading information regarding compliance with Australian standards on its packaging.
Hurphy Durphy		Available from many retailers	Fabric Buckle Cover	\$24.99	No	Product is made from soft fabric and Velcro.


BRAND	IMAGE	MANUFACTURER	VIDEO DEMONSTRATION	APPROX. PRICE	AUSTRALIAN STANDARDS COMPLIANCE	COMMENTS
McNaughton Incorporated		Here	Buckle Guard Pro	\$29.95	No	Amazon user reviews report that the cap mechanism is not always reliable.
Mobility Engineering		Here	ME device	\$78 (Note: increased to \$101 in 2021 and \$107 in 2022)	No	Requires a key (or similar size probe) to open. Supplied with seatbelt cutter and warning stickers for vehicles.
Morlike		Available from many retailers	Here	\$31.50	No	
Safety Buckle Pro		Available from many retailers	Here	\$20.25	No	
Secureseat		Tousergo	N/A	€44.90 (euro)	No	

BRAND	IMAGE	MANUFACTURER	VIDEO DEMONSTRATION	APPROX. PRICE	AUSTRALIAN STANDARDS COMPLIANCE	COMMENTS
Seatbelt Extender Pros		Here	Here	\$12.98 USD	No	Comes in a pack of two.

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 child restraint 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.

Child restraint buckle covers

BRAND	IMAGE	WEBSITE	VIDEO DEMONSTRATION	AUSTRALIAN STANDARDS COMPLIANCE	PRICE	COMMENTS
Buckle-upp		Here	Available on website	NO	\$49.00	
Lilli Blossom		Here	N/A	NO	\$19.99	Comes in two sizes to fit different buckles.

BRAND	IMAGE	WEBSITE	VIDEO DEMONSTRATION	AUSTRALIAN STANDARDS COMPLIANCE	PRICE	COMMENTS
Merritt		Here	(Merritt Website)	NO	Refer to site	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 child restraint 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 2

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.

This advice is still under development as some states and territories do not have adequate legislation and processes in place to guide their legal use. MACA understands this impacts on child and family safety and makes it difficult for families 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.

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

Please refer to the relevant state or territory.

[Australian Capital Territory](#)

[New South Wales](#)

[Northern Territory](#)

[Queensland](#)

[South Australia](#)

[Tasmania](#)

[Victoria](#)

[Western Australia](#)

For state and territory referral letter templates please refer to the relevant state or territory on MACA’s [website](#).

ACT

Does the parent/guardian need to make a formal application to the relevant road agency to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

Yes.

The ACT Government ([Transport Canberra and City Services](#)) advises that seatbelt buckle covers are not compliant with the Australian Design Rules applicable to seatbelts, or the ACT Road Transport (Vehicle Registration) Regulation 2000 (Vehicle Registration Regulation).

Parents/guardians can apply for an exemption under section 104 of the Vehicle Registration Regulation by contacting the Vehicle Inspection and Technical Unit in Access Canberra via email vitu@act.gov.au or phone 02 6207 7236.

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: medical certificate. Refer to [MACA's templates](#).

Seatbelt buckle cover: exemption (see above)

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover: medical practitioner. Refer to [MACA's templates](#).

Seatbelt buckle cover: The ACT Government (Transport Canberra and City Services)

New South Wales

Does the parent/guardian need to make a formal application to Transport for NSW to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

No. The NSW Vehicle Standards Information 49 (VSI 49) provides the conditions that must be met for the legal use of a seatbelt buckle cover, without needing to apply to Transport for NSW.

VSI 49 is out-of-date and MACA has requested this be updated. MACA has been advised that this is currently being undertaken. The current VSI 49 requires the following:

- Medical certificate provided, carried in the vehicle with buckle cover manufacturer's instructions attached.
- Seatbelt buckle cover must comply with AS 4370:1996 and be fitted in accordance with manufacturer's instructions. (Please note this is **not** the current standard and MACA is unable to advise on the legal implications of this).
- The seatbelt buckle cover must be removed when not being used by the nominated person.

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: medical certificate. Refer to [MACA's templates](#).

Seatbelt buckle cover: medical certificate and manufacturer's instructions for use. Refer to [MACA's templates](#).

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover: medical practitioner

Seatbelt buckle cover: medical practitioner

Northern Territory

Does the parent/guardian need to make a formal application to the Department of Infrastructure, Planning and Logistics, to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

No application required.

MACA worked closely with the Department of Infrastructure, Planning and Logistics (DIPL) to improve access and legal use requirements for seatbelt buckle covers. This resulted in the Northern Territory government publishing a gazette notice - [Prescribed Device Exemption](#) - on 14 March 2022.

More information: Seatbelt buckle cover Prescribed Device Exemption [Information Sheet](#)

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: medical certificate. Refer to [MACA's templates](#).

Seatbelt buckle cover: Advice to Parent form or medical certificate **and** manufacturer's instructions. Refer to [MACA's templates](#).

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover: medical practitioner

Seatbelt buckle cover: prescriber or medical practitioner

Medical Practitioner means a person registered under the Health Practitioner Regulation National Law to practise in the medical profession (other than as a student).

Prescriber means a medical practitioner, occupational therapist, psychologist, physiotherapist, rehabilitation engineer, or biomedical engineer.

Queensland

Does the parent/guardian need to make a formal application to the Department of Transport and Main Roads (TMR) to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

No application required.

MACA worked closely with the Department of Transport and Main Roads (TMR) to improve access and legal use requirements for seatbelt buckle covers. This resulted in TMR publishing *Safe movement guideline: Use of seatbelt buckle covers for passengers with disabilities or medical conditions* in December 2021.

As the fitment of a seatbelt buckle cover may result in a light vehicle being considered as defective under the Vehicle Standards and Safety Regulation section 7(1)(b)(iii) vehicles operating under the guideline are exempt from the relevant requirements, as detailed in the guideline.

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: Advice to Parent form (also known as a Prescriber's certificate) issued by a *specialist*, defined in the [Road Rules](#) as doctor, occupational therapist, psychologist, physiotherapist or biomedical engineer. Refer to [MACA's templates](#).

Seatbelt buckle cover: Advice to Parent form (also known as a Prescriber's certificate) issued by a prescriber or specialist, defined in the *Safe movement guideline* as a medical practitioner, occupational therapist, physiotherapist, or biomedical/rehabilitation engineer. Refer to [MACA's templates](#).

South Australia

Does the parent/guardian need to make a formal application to the Department for Infrastructure and Transport (DIT) to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

There are two options available. This is unique to SA and MACA continues to work with DIT to improve legislation.

MACA recommends **option one**, using [MACA's templates](#) to assist.

Option one (medical certificate): Application to DIT not required.

This requires a medical certificate to be carried at all times when the child is travelling in a vehicle, stating grounds for exemption due to medical condition or disability (Australian Road Rules (ARR), r 267(3A)).

Option two (ministerial exemption): Application to DIT required.

A Ministerial certificate of exemption granted under ARR, r 267(3), and Road Traffic (Road Rules Ancillary and Miscellaneous Provisions) Regulations 2014 (SA), reg 37, following assessment by Department for Infrastructure and Transport (DIT), Vehicle Services, with a medical certificate.

Seatbelt buckle cover (children under 16 years)

MACA is awaiting advice from the Department for Infrastructure and Transport (DIT).

For more information [contact MACA](#) or DIT vehicle standards (08) 8348 9693, email Alan.Whittaker@sa.gov.au or David.Gunner@sa.gov.au

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover

Option one (medical certificate): This must be carried at all times when the child is travelling, stating grounds for exemption due to medical condition or disability (Australian Road Rules (ARR), r 267(3A)).

Option two (Ministerial exemption): Application to DIT required. A Ministerial certificate of exemption granted under ARR, r 267(3), and Road Traffic (Road Rules Ancillary and Miscellaneous Provisions) Regulations 2014 (SA), reg 37, following assessment by Department for Infrastructure and Transport (DIT), Vehicle Services, with a medical certificate.

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover

Option one: Medical practitioner

Option two: Arranged through the DIT. Contact vehicle standards (08) 8348 9693 or email Alan.Whittaker@sa.gov.au or David.Gunner@sa.gov.au

Seatbelt buckle cover

Department for Infrastructure and Transport (DIT). Contact vehicle standards (08) 8348 9693 or email Alan.Whittaker@sa.gov.au or David.Gunner@sa.gov.au

Tasmania

Does the parent/guardian need to make a formal application to the Transport Commission to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

Yes, as the Department of State Growth advises that the fitment of a seatbelt buckle cover means the seatbelt no longer complies with the relevant Australian Design Rules (ADR) applicable to seatbelts. This is because the buckle cover prevents the operation of the buckle release being performed in a single action, as required by the ADRs.

An exemption by the Transport Commission, via regulation 56 of the *Vehicle and Traffic (Vehicle Operations) Regulations 2014* may be issued, exempting each specified vehicle to which the buckle cover will be applied.

For an exemption to be issued, the applicant (owner or registered operator of each nominated vehicle) must complete both an application and a prescription form and return to Vehicle Standards for assessment. Where applicable an exemption from the specific requirement of the applicable ADR will be issued.

For more information contact: Department of State Growth, Telephone: 1300 135 513 or email tse@stategrowth.tas.gov.au

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: medical certificate. Refer to [MACA's templates](#).

Seatbelt buckle cover: exemption (see above)

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover: medical practitioner. Refer to [MACA's templates](#).

Seatbelt buckle cover: Department of State Growth

Victoria

Does the parent/guardian need to make a formal application to the relevant road agency to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

MACA is awaiting advice from the Department of Transport.

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: medical certificate. Refer to [MACA's templates](#).

Seatbelt buckle cover: MACA is awaiting advice from the Department of Transport.

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover: medical practitioner. Refer to [MACA's templates](#).

Seatbelt buckle cover: MACA is awaiting advice from the Department of Transport.

Western Australia

Does the parent/guardian need to make a formal application to the relevant road agency to legally use a buckle cover?

Child restraint buckle cover (children under 16 years)

No application required.

Seatbelt buckle cover (children under 16 years)

MACA is awaiting advice.

What evidence must be in the vehicle to show that the child is travelling in accordance with the law?

For children under 16 years

Child restraint buckle cover: Advice to Parent form **AND** medical certificate confirming diagnosis as recorded in the Advice to Parent form **OR** medical certificate exempting the child from wearing a seatbelt (see below)

Seatbelt buckle cover: MACA is awaiting advice.

Who can provide the parent/guardian with the evidence that the child is travelling in accordance with the relevant road rules?

For children under 16 years

Child restraint buckle cover: a medical practitioner, occupational therapist, psychologist, physiotherapist, rehabilitation engineer, or biomedical engineer can prescribe and provide an Advice to Parent form.

However, in all cases a medical certificate must also be obtained confirming the child's diagnosis. Both the Advice to Parent form and medical certificate must be carried in the vehicle the child is travelling in at all times. Refer to the Exemption Notice for more information.

OR

Medical practitioner: medical certificate providing an exemption for the child from wearing a seatbelt (r.231 Road Traffic Code 2000)

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.

WARNING: Some buckle cover manufacturers publish misleading information on the product packaging which may suggest compliance with AS 8005.

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 child is travelling in.

What should I tell a parent to do in an emergency when their child 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 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).

Does the parent need a medical certificate to legally use the buckle cover?

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.

Can children undo buckle covers?

Parents report that some children can easily undo buckle covers. Therefore, it is important when the buckle cover is first used that the parent is advised to monitor the child's response. To minimise driver distraction, where possible, it is recommended that an additional person is available to assist in the car for the first few trips. If the parent is unable to have this support it is recommended the parent choose travel routes 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?

When a buckle cover is initially prescribed, advise the parent that their child may attempt to get out of the child restraint or vehicle seat, for example by sliding under the lap part of the seatbelt. As this is a significant road safety risk, we recommend nominating a short review period to monitor the effectiveness of the buckle cover.

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 child, the driver, other vehicle occupants and road users. For example, some products are easy for children to remove (not fail-proof); and some children 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 child 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 family, regularly reviewing the child's transport needs, and providing parent education.

What is MACA doing to improve access to information about buckle covers for allied health professionals?

We know allied health professionals find it difficult to access up-to-date information that gives assurance that transport recommendations meet standards, best practice, and legal requirements.

MACA's website, funded by the Australian Government Department of Social Services, provides guidance for allied health professionals in assessing and prescribing suitable vehicle restraint options for children with disabilities and medical conditions, in-line with best practice and legal requirements in each state and territory.

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

MACA offers 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 children with disabilities and medical conditions?

MACA is committed to advancing the rights of children with disabilities and medical conditions to safe and accessible 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

undertakes independent assessments (including crash testing where relevant) of restraint types used by children with disabilities and medical conditions. The results are used to inform tools, training and resources for allied health professionals to support children and their families.

MACA also works with suppliers to enable the introduction of new special purpose car seats to Australia. This is closing product gaps, particularly in the areas of anti-escape features and lie flat child restraints. 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. This project developed a [report](#) aimed at inspiring vehicle manufacturers, product designers and innovators to develop better solutions for buckle release challenges. For more information, email contact@macahub.org



**Mobility & Accessibility
for Children in Australia**

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

