



DESIGN CONFIDENCE

Girl Guides Australia

BCA Performance Solution Report

Proposed Childcare Centre
Lot 1, 29 Lawrence Street
Freshwater NSW 2096

Project: Proposed Childcare Centre - 1 Lawrence Street Freshwater NSW 2096
 Document Type: BCA Performance Solution Report
 Our Reference: P220_271-2 (BCA PS) LB

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Revision History—

OUR REFERENCE	REMARKS	ISSUE DATE
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1.0 INTRODUCTION

1.1 General

This BCA Performance Solution Report has been prepared at the request of Willowtree Planning on behalf of Girl Guides Australia and relates to the proposed childcare centre within an existing Girl Guides hall located at 1 Lawrence Street, Freshwater NSW 2096.

This BCA Performance Solution Report refers to the following compliance departure—

- (i) Facilities for use by children or juniors are not proposed to be provided within the required facilities, thereby causing a compliance departure with Clause F2.3 of the BCA.

Refer to **Figure 1** below for the location of the subject compliance departure listed above.

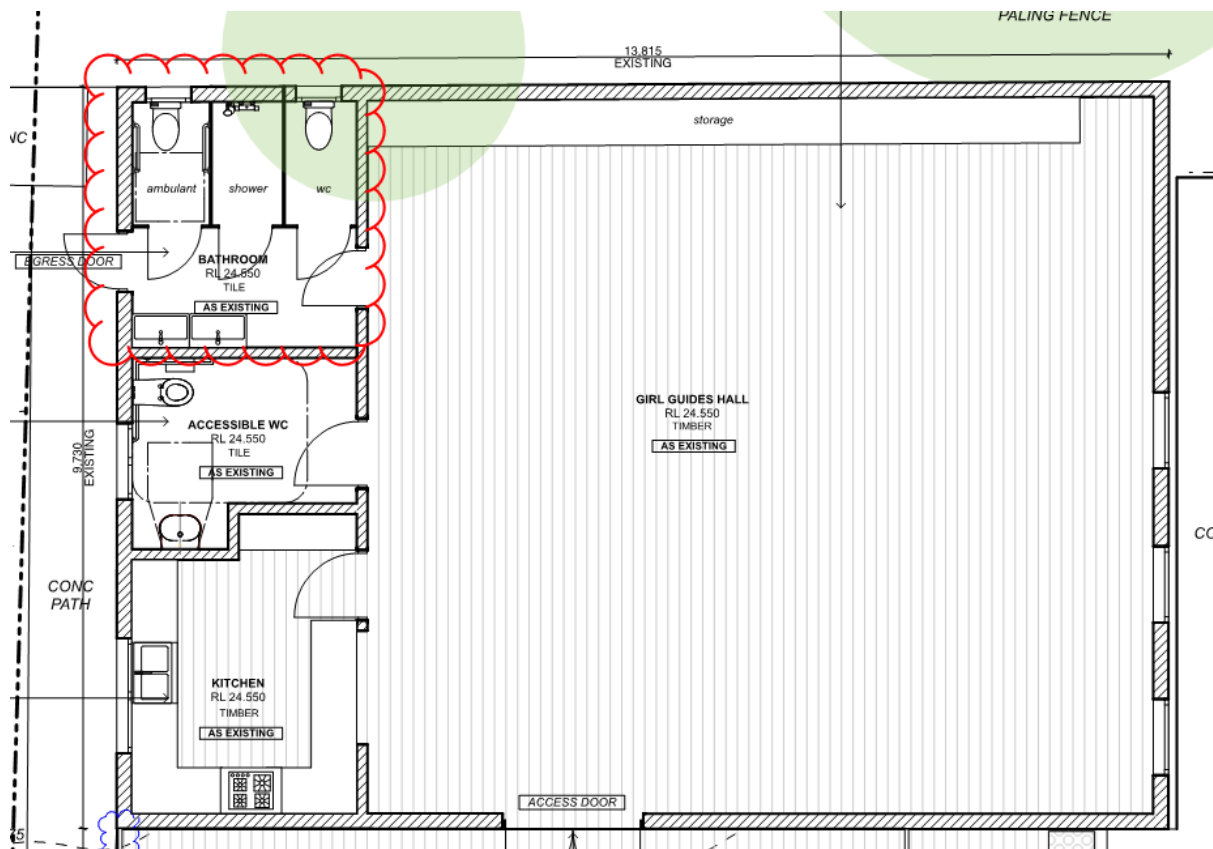


Figure 1 – Compliance departure (i)

1.2 Basis of Report

The assessment contained within this report reflects—

- (i) The Building Code of Australia, Volume 1, Edition 2019 Amendment 1, inclusive of the NSW variations;
- (ii) Architectural drawings prepared by Interlock Construction, namely –

Table 1 – Relevant design documentation

DRAWING	REV	TITLE	DATE
PO2	-	Proposed alterations and additions to existing hall	18.08.2020

1.3 Scope of Project

This report has been prepared to identify and analyse the proposed Performance Solution and demonstrate that the proposal satisfies the Performance Requirements of the BCA in accordance with BCA Clause A2.2. A summary of the proposed performance solution is shown in **Table 2** below.

Table 2 – Summary of performance solutions

ITEM	BCA DIS PROVISION	BCA PERFORMANCE REQUIREMENT	ASSESSMENT METHODOLOGY	DIS NON-COMPLIANCE & PROPOSED PERFORMANCE SOLUTION
1	F2.3	FP2.1	A2.2(1)(a) / A2.2(1)(b) & A2.2(2)(b)(ii) / A2.2(2)(d)	Facilities for use by children are not proposed to be provided within the facility, thereby causing a compliance departure with Clause F2.3 of the BCA. It shall be demonstrated that suitable sanitary facilities have been provided within the building, having regard the base building provisions and international technical standards.

1.4 Stakeholders

The relevant stakeholders to the preparation and implementation of this report are shown below in **Table 3** below.

Table 3 – Relevant Stakeholders

ROLE	REPRESENTATIVE	ORGANISATION
Client / Project Manager	Jason Cowland	Girl Guides
Architect / Designer	Troy Newman	Interlock
Certifying Authority	TBC	TBC
Building Regulations Consultant	Lindsay Beard Nicolas Hurtado	Design Confidence

1.5 Limitations

This report is based upon, and limited to, the information depicted in the documentation provided for assessment and does not make any assumptions regarding design intention or the like.

The content of this report relates only to the non-compliance and subject building identified.

The study will be undertaken on the information made available by the design team. No liability is accepted on the accuracy of the information provided.

Any change in the above information to suit future re-organisation or planning will require further assessment to confirm compliance with the intent of the design objectives.

1.6 Report Exclusions

It is conveyed that this report should not be construed to infer that an assessment for compliance with the following has been undertaken—

- (i) Work Health & Safety Act and Regulations; and
- (ii) Work Cover Authority requirements; and
- (iii) The Disability Discrimination Act (DDA) 1992; and
- (iv) Any parts of the BCA and/or technical standards other than those directly referenced in this report.

2.0 DEVELOPMENT DESCRIPTION

2.1 General

The assessment undertaken herein relates directly to the proposed alterations and additions to the existing Girls Guide hall located at 1 Lawrence Street Freshwater NSW 2096, specifically the prescriptive non-compliance/s identified in **Section 1.1** above.

2.2 Building Characteristics

The proposed childcare centre is located within an existing Girl Guides hall located at 1 Lawrence Street, Freshwater NSW 2096.

The proposed use of the building will be a mixed-use building, being a hall and childcare centre, achieving a BCA function and use classification of Class 9b.

All new work is required to comply with the BCA and specifically with *Part F2 – Sanitary and other facilities*.

2.3 Occupant Characteristics

The building occupants (when operated as a childcare centre) assessed within are characterised upon their number and degree of familiarity of the building and can be broadly classified into three (3) main groups—

- (i) Occupant group 1 – employees;
- (ii) Occupant group 2 – children;
- (iii) Occupant group 3 – visitors / parents / guardians.

All occupants are expected to have varying levels of mobility as well as varying levels of familiarity within the building.

Employees will be familiar with the facilities and will be present during the operating business hours.

Children of all ages are expected to be present within the building, having varying levels of awareness, however, would be required to be accompanied by an adult in an emergency or toileting.

Visitors are not considered to be familiar with the building layout and will be reliant on employee assistance and/or building signage.

3.0 BCA DETAILED ASSESSMENT

3.1 Objectives and Performance Requirements

The BCA states that compliance with the *Performance Requirements* can only be satisfied by—

- (i) A Performance Solution; or
- (ii) A Deemed-to-Satisfy Solution; or
- (iii) A combination of (i) and (ii).

3.2 Relevant Performance Requirements

As contained within **Section 1.3** and **Section 2.1** of this report, new works to the building are required to comply with the BCA 2019 and therefore require a Performance Solution to justify any DtS non-compliance.

The stakeholders nominated within **Section 1.4** have been advised of the following DtS compliance departure for which a Performance Solution is proposed, which are summarized below in **Table 4**—

Table 4 – Summary of compliance departures

ITEM	BCA DtS PROVISION	COMPLIANCE DEPARTURE	BCA PERFORMANCE REQUIREMENT
1	F2.3	Facilities for use by children are not proposed to be provided within the facility, thereby causing a compliance departure with Clause F2.3 of the BCA.	FP2.1

The applicable parts of the above Performance Requirements are as follows—

FP2.1 – Personal Hygiene Facilities

Suitable sanitary facilities for personal hygiene must be provided in a convenient location within or associated with a building, to the degree necessary, appropriate to—

- (a) *The function or use of the building; and*
- (b) *The number and gender of the occupants; and*
- (c) *The disability or other particular needs of the applicants.*

4.0 ADOPTED ASSESSMENT METHOD

4.1 General

The acceptance criteria stipulated within **Section 4.3** of this report represents the benchmark for measuring compliance for the proposed Performance Solution.

4.2 Method of Analysis

The BCA assessment method that is to form the basis for the Performance Solution has been nominated in **Table 2**. The methodology outlined within **Table 5** below is to be used as part of the performance analysis.

Table 5 – Method of analysis

ITEM	PERFORMANCE SOLUTION	METHOD OF ANALYSIS
1	To permit regular toilet pans in lieu of junior pans within the proposed childcare centre.	Based upon an absolute and comparative assessment, consideration shall be given to the base building sanitary facilities and the sanitary facilities requirements contained within technical guidelines for early childhood centres.

4.3 Acceptance Criteria

For the Performance Solution, recognising the nature of the prescriptive non-compliance, **Table 6** lists the relevant acceptance criteria—

Table 6 – Acceptance criteria

ITEM	PERFORMANCE SOLUTION	ACCEPTANCE CRITERIA
1	To permit regular toilet pans in lieu of junior pans within the childcare centre.	This performance solution is considered acceptable if it is shown that suitable sanitary facilities are provided within or associated with the building, meeting Performance Requirement FP2.1 of the BCA.

5.0 PERFORMANCE SOLUTION

5.1 Preamble

In accordance with A2.2 of the BCA, any Performance Solution must consider all relevant Performance Requirements.

Performance Requirement FP2.1 has been directly identified as the only relevant Performance Requirement in relation to the subject compliance departure.

Performance Requirement FP2.1 in this instance concerns itself with ensuring personal hygiene being provided in a convenient location within or associated within a building, to the degree necessary appropriate to the particular needs of the occupants (children).

5.2 Performance Solution – Performance Requirement FP2.1

5.2.1 Discussion

The existing Girl Guides hall is proposed to have a dual use, being a hall for general use by the Girl Guides and as a childcare centre (Harbord Kindergarten).

It is proposed to provide non-junior facilities in lieu of junior pans and low height basins within the building when operated as a childcare centre.

Clause F2.3 (a) of the BCA states sanitary facilities are to comply with table F2.3. Table F2.3 states that facilities for use by children in a 9b early childhood centre must be-

- (a) Junior pans; and
- (b) Washbasins with a rim height not exceeding 600mm; and
- (c) Accessible from both indoor and outdoor play areas.

This performance solution addresses the suitability of the use of non-junior facilities in lieu of junior facilities within the childcare centre, having regards to the proposed use of the building, comparative analysis with other buildings and Australian technical guidelines for early childhood centres.

5.2.2 Assessment

The purpose of this BCA Performance Solution and the departure identified in this instance relates to the provision of non-junior facilities in lieu of junior facilities within the proposed childcare centre in accordance with information provided by Willow Tree Planning, (refer to Appendix 1).

The NCC 2019 Amendment 1 Guide to BCA Volume One states the intent of F2.3 is:

“to specify the minimum acceptable sanitary, bathing, laundry and cooking facilities required in Class 3 (for employees only) and in Class 5-9 buildings.”

As such, it shall be demonstrated that the facilities for use by children are suitable for the intended use of the premises.

A junior toilet is designed specifically for the ergonomic, safety and hygiene needs of children aged between three and six years old. Children within this age group will be present when the childcare centre is in operation.

Multi-purpose building comparison

When the proposal is compared against a multi-purpose building such as a shopping centre, there is no requirement within a shopping centre to provide junior facilities for children. Within the shopping centre occupants of varying ages (i.e. infants to seniors) will be present, however there is an assumption that parental assistance will be provided to those children within the shopping centre. Within the childhood centre each child's parents are not present and the children are under the supervision of staff. However, it is expected that staff would perform the same tasks in supervision in toileting as a parent would within a shopping centre.

Home-based childcare comparison

Home-based childcare means a childcare service that is provided at the home of the licensee of the service for the purpose of educating, minding or caring for (but without providing residential care for) one or more children (disregarding any children who are related to the person providing the service).¹ These are permitted within Class 1a dwellings and generally only contain adult facilities as the primary purpose of the building is a dwelling. This is akin to the proposed building being a girl guide hall with the secondary purpose of being a childcare centre. Both operators would be expected to assist children in using the facilities at all times.

Based on documentation prepared by the NSW Government in their guide 'Setting up your home for family daycare'² a firm non-slip step is required within a bathroom so children can reach the toilet and washbasin.

The Australian Children's Education and Care Quality Authority (ACECQA) is an independent national authority that assists governments in administering the National Quality Framework (NQF) for children's education and care. Within their document "The guide to the National Quality Framework"³ states the following:

"In some services catering for children preschool age or under, a potty or over-toilet seat may be appropriate. If the toilets and hand washing facilities are not designed for use by young children, there should be appropriate mechanisms in place to support children's access to toilet and hand washing, for example, stable steps."

The above is a guiding document in achieving compliance with Education and Care Services National Regulations.

Management in-use plan

In order to ameliorate any concerns in regards the sanitary facilities provision, a management in-use plan shall be implemented by the childcare operator such that employees are made aware of the sanitary facilities provisions and the procedures in place for the facilities. Appendix 1 and Appendix 2 are the current policies for the centre which are considered sufficient in maintaining safe and suitable facilities for the children.

From the above, it is considered that the subject facilities perform the same function, use and purpose to that of a facility with junior pans and basins for the children. With a toileting policy in place the facility will meet the intent of the BCA and National Regulations and policies. Subsequently, it is demonstrated that the particular needs of the children will be afforded pursuant to Performance Requirement FP2.1.

¹ Family day care and home based childcare services regulation 1996 No. 142

² Early childhood Education Directorate, NSW Government, 2019, Setting up your home for family daycare.

³ ACECQA, 2020, Guide to National Quality Framework

5.2.3 Summary

The assessment undertaken above demonstrates that the proposed sanitary facilities are considered appropriate for the childcare facility. Furthermore, the solution satisfies the acceptance criteria nominated for this assessment in **Section 4.3** above.

6.0 CONCLUSION

6.1 General

The proposed Performance Solution described herein has been assessed by the use of A2.2(1)(a) and Assessment Methods A2.2(2)(b)(ii) of the BCA, which has been satisfied.

It is the opinion of Design Confidence (Sydney) Pty Ltd that the proposed Performance Solution satisfies Performance Requirement FP2.1 of the BCA, subject to the implementation of the recommendations referred to below.

6.2 Implementation Requirement

The following requirement for implementation is derived through the assessment performed and is critical to ensure the effectiveness of the BCA Performance Solution—

- (i) The toileting and bathroom procedures document referenced in Appendix 1 is to be implemented by the childcare operator to ensure that employees are made aware of the sanitary facilities provisions for children whilst attending the childcare centre. This incorporates the use of portable steps to toilets and handwashing facilities.

Failure to meet the above requirement will contravene the assessment undertaken in **Section 5** above.

Report By



Lindsay Beard
Associate | Building Regulations
For Design Confidence (Sydney) Pty Ltd

Verified By



Nicolas Hurtado
Senior Associate
For Design Confidence (Sydney) Pty Ltd

APPENDIX 1 – Toileting Policy

Harbord Kindergarten Bathroom, Toileting and Nappy changing Practice and Procedures for the Girl Guide Hall: Created 04/06/2020

- NQS Quality Area 1: Element 1.1.3 - The program, including routines, is organised in ways that maximise opportunities for each child's learning
- NQS Quality Area 2: 2.1 - Each Child's health is promoted.
- NQS Quality Area 5: Element 5.1.1 - Interactions with each child are warm, responsive and build trusting relationships. Element 5.2.3 - The dignity and rights of each child are maintained at all times.

Staff will:

- Support children's agency to develop an understanding and control of their own bodily functions
- Give children their full attention and build respectful, trusting and caring relationships
- Interact with children using verbal and nonverbal communication
- Build children's understanding of what is happening now and promote their ability to predict what will happen next in the routine
- Help children to develop and extend their self-help skills.
- Allowing children to take their time, avoiding pressuring them
- Respond to children's cues and allowing them to be active participants in the process
- Where possible, using the correct terms for going to the toilet - ask families what words they use at home, as consistent language between home and care will help children to understand and learn more easily
- Be sensitive to individual children's needs and styles and toileting procedures to each child
- Prompt children by asking or reminding them about using the toilet
- Taking full advantage of every opportunity for a focused, positive interaction with children during toileting and nappy change times, however brief these might be
- Always being positive about toilet training so that your encouragement is reinforced in your language and actions
- Be respectful and sensitive to children's dignity and rights to privacy (r 155 Education and Care Services National Regulations)

Staff will continue to maintain supervision at all times by:

- Ensuring the door leading into the bathroom and toilet doors are fixed back by hooks out of childrens reach, at all times.
- Ensure step stools are available and secure for children that cannot reach the adult toilets.
- Ensure step stools are available and secure for children that cannot reach the bathroom taps to wash hands.
- Children will be well practiced at informing staff that they require the toilet.
- Staff ratios are maintained to allow for accompany children to the toilet whilst remaining staff position themselves to be able to view and monitor the bathroom and toileting procedures.
- Recommended hygiene and safety practices are reflected in all bathroom and toileting procedures at all times.
- Childrens individual needs are in place and displayed.
- Self-help skills and independence are promoted at all times.
- Children are offered by staff, the right to request privacy at any time.
- Children learn about and are well practiced in their role of flushing the toilet and independently, wiping, dressing and washing their hands.
- Children's home toileting language and/or practices are incorporated into the procedures and practices.

Management procedures of toileting accidents:

1. Staff alert colleagues to situation.
2. Staff collect childrens bag with spare clothes.
3. Staff place gloves on, clean child using wipes.
4. Staff place wet items in wet bag or in plastic bag.
5. Dispose of gloves and wipes into nappy bag.
6. Dress child.
7. Tie wet bagged clothing to child's bag. Place soiled clothing in available laundry bag for parents to collect. Mark on Sign out to alert parents to pick up.

Bathroom cleaning procedure:

- Cleaning product to be used is the detergent in Spray bottles only. Dilution level is 1 part detergent to 3 parts water only. Detergent is to be stored in the chemical storage cupboard in Kitchen of Girl Guides at all times.
- Children's bathrooms must be maintained in a sanitary condition and cleaned twice throughout the day. Staff assigned to cleaning the bathroom facilities should wear protective gloves to protect themselves from contamination.

Procedure is as follows:

1. Staff place protective gloves on
2. Sweep floor and remove rubbish
3. Use Detergent spray bottles to spray sinks, taps and walls (especially under driers) rinse and dry with paper towel.
4. Lift toilet lids, use cleaning solution to spray bowls, scrub using available toilet brushes.
5. Use cleaning solution to spray and rinse toilet seat and lids and dry with a paper towel.
6. Using warm soapy water, mop floor if necessary at midday and in the afternoon.
7. Replenish toilet paper and hand foam if necessary.
8. Sign cleaning roster.

Please note: If a surface has been cleaned and dried with a detergent dilution there is no need to disinfect.

Nappy Changing procedure:

(Children are encouraged to be toilet trained before commencement of attending Harbord Kindergarten – however, we have in place a Nappy changing procedure for children with disabilities and children still requiring support in this area)

1. Inform fellow staff of Nappy Change taking place.
2. Wedge door open of disabled bathroom, so fellow staff members are ready to support if necessary.
3. Ensure all supplies that are required are ready collected from Nappy Station
4. Prepare child by asking if it's ok to change their Nappy.
5. Wash Hands
6. Put disposable gloves on both hands.
7. Place long strip of paper towel onto change mat.
8. Prepare new nappy, nappy bag and wipes at arm's length.
9. Lie child down on the change mat (Older child may prefer to stand)
10. Remove soiled items and place soiled nappy in the nappy bag.
11. Clean child by wiping faeces and urine with wipes - place in nappy bag.
12. Place gloves, and paper, if soiled, in nappy bag and dispose in bin.
13. Put new gloves on and then place new nappy on child.
14. Dress child and help child onto the floor.
15. Clean area using spray and paper towels.
16. Follow hand washing procedures.

Make note of change in parent's communication book.

REFERENCES AND RESOURCES

Early Childhood Australia Code of Ethics at www.earlychildhoodaustralia.org.au United Nations Convention on the Rights of the Child at www.unicef.org.au Staying Healthy Preventing infectious diseases in early childhood education and care services at www.nhmrc.gov.au Guide to the National Quality Standard at acecqa.gov.au

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