

**Submission
No 67**

INQUIRY INTO PUBLIC TOILETS

Organisation: Guide Dogs NSW

Date Received: 2 December 2024

Guide Dogs.

Submission to Portfolio Committee No. 8

Customer service on public toilet accessibility.



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Contact:

Tamara Searant,
General Manager Social Change
socialchange@guidedogs.com.au

Introduction.

At Guide Dogs NSW/ACT, our vision is to create a world that is inclusive and accessible for everyone with low vision or blindness. We believe that advocacy and education are essential to breaking down barriers and creating a welcoming society. We use our voice to educate the community and uphold the rights of people with low vision or blindness.

For more than 65 years, Guide Dogs NSW/ACT has supported people with low vision or blindness to get around their communities safely and independently. We are proud to be the leading provider of Guide Dogs and Orientation and Mobility services in New South Wales and the Australian Capital Territory. We offer personalised support, equipment and training to empower people with low vision or blindness to live life their way.

We collaborate closely with individuals, businesses and government organisations and take part in panels like the Australian Standards and the Accessible Transport Advisory Committee (ATAC) to help shape policies that promote inclusivity.

There are currently over 500,000 Australians living with low vision or blindness. Despite this significant portion of the population, many public spaces and facilities are still not designed to support full inclusion and participation for people with low vision or blindness.

To address these challenges, we urge the government to consider our key recommendations:

- Involve the community in public toilet planning and design.
- Mandate accessible public toilets as a legal requirement.
- Add helpful navigation and safety features to public toilets.
- Add accessible relief areas for Guide Dogs in public spaces.
- Conduct regular accessibility audits of public toilets.
- Implement education and public awareness campaigns about accessible public toilets.

Our Clients.

In the past year, Guide Dogs NSW/ACT has delivered 2,296 programs to assist Clients their families and caregivers, to increase their skills, confidence and access to support and accessibility tools, giving them more choice around how they go about their day-to-day lives and move around their communities.

Access to public facilities and services is crucial to fully participating in the community, which is why we are committed to improving the accessibility of public toilets to ensure independence, dignity and inclusion for everyone.

Submission context.

This submission highlights the current laws and guidelines related to public toilet accessibility and identifies areas for improvement. The following legislative frameworks play a pivotal role in shaping public toilet accessibility in New South Wales:

- Disability Discrimination Act 1992 (Commonwealth): prohibits discrimination against individuals with disabilities and ensures equal access to public facilities, including toilets. It also guarantees the right for people with disabilities to be accompanied by their Assistance Animals in all public spaces.
- Disability Inclusion Act 2014 (NSW): promotes an inclusive environment for people with disabilities in New South Wales. It emphasises the importance of community consultation in developing policies that affect accessibility.
- Companion Animals Act 1998 (NSW): protects the rights of Assistance Animals in public areas, so people with low vision or blindness can use public facilities with their Guide Dogs.
- National Construction Code (NCC) and Australian Standards (AS 1428.1 – Design for Access and Mobility): outline specific design standards for public spaces. However, these instruments don't fully address the unique needs of people with low vision or blindness, especially the need for tactile navigation and clear wayfinding.

- Anti-Discrimination Act 1977 (NSW): supports fair treatment for people with disabilities and can be interpreted to support access to public facilities, including toilets.

Purpose of this submission.

This submission responds to the *'Portfolio Committee No. 8 – Customer Service'*, focusing on key areas that ensure all public toilets across New South Wales are accessible, inclusive and supportive of everyone's needs.

Provision, design, accessibility and inclusivity of public toilets across New South Wales.

- We emphasise the importance of accessible public toilets and suggest practical design improvements, like tactile navigation aids, clear signage and dedicated relief areas for Guide Dogs.
- Feedback from our recent visit to the Crows Nest Metro station outlined the value of simple improvements, like audible door lock signals and emergency call confirmations to make facilities comfortable and easy to use for people with low vision or blindness.

State, national, and international best practices for the provision and maintenance of public toilets.

- Informed by a case study from Japan and feedback from our Crows Nest Metro station visit, we present successful strategies from around the world in this submission that make public toilets truly accessible.
- By sharing insights from the lived experiences of people with low vision or blindness and our participation in advisory panels, we can highlight practical ways to enhance accessibility in New South Wales.

Regulation and funding for public toilets in New South Wales.

- Our submission advocates for updated laws and standards to

ensure public toilets are accessible to everyone and especially people with low vision or blindness.

- We recommend legislative requirements and regular accessibility audits are implemented to guarantee compliance and consistency with the changing needs of people with low vision or blindness.

Other related matters.

- We also highlight the social and economic benefits of accessible toilets and the importance of involving the community in planning and design.
- This collaborative approach, demonstrated in the success of our Crows Nest Metro station visit, ensures public amenities support everyone's ability to participate fully in the community.



Submission for accessible public toilets.

Right to dignity, independence and full participation.

Everyone has the right to make their own choices and participate fully in the community. Making community participation easy promotes a culture of respect and support for everyone. This is why it's essential to have inclusive public spaces where everyone feels like they belong.

A study conducted by Katherine Webber highlights the importance of accessible facilities, stating:

“if a person or group... is unable to locate, access, or use a public toilet, their use and participation in the public space that the toilet is in is limited, therefore restricting their full involvement as a citizen”¹.



In Australia, the right to freely participate in the community is protected by key legislation, including Article 27 of the Universal Declaration of Human Rights². Additionally, the Disability Discrimination Act 1992 (Commonwealth) promotes equality and prohibits discrimination based on disability, promoting people with low vision or blindness to have the same rights and opportunities to engage fully in their communities.

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- ¹ [Webber, K. \(2018\). 'Exploring accessibility and inclusion in public toilets: A report from the Rodney Warmington Churchill Fellowship.'](#) Retrieved 26 October 2024.
 - ² [Universal Declaration of Human Rights.](#) Retrieved 26 October 2024.

Public facilities and accessibility.

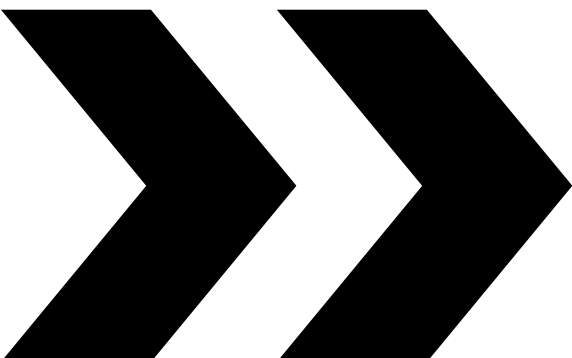
Accessible toilets with specific technical standards are necessary, but it's important to recognise that people who are blind or have low vision can use a variety of toilet facilities.

Everyone is different and some people may prefer regular stalls over accessible ones. All public toilet facilities must be designed with accessibility in mind, including features like tactile signage, audible indicators and clear wayfinding to meet the diverse needs of all users.

While Australia has made progress in this area, we can still improve accessibility for people with low vision or blindness. Addressing gaps presents opportunities for positive change:

- **Limited tactile navigation aids:** current standards often overlook the need for tactile maps, high-contrast signage and audible navigational aids. By updating standards, we can help people with low vision or blindness to navigate their communities confidently and independently.

- **Lack of community consultation:** often, the voices of people with disabilities are excluded from design decisions, which can lead to important accessibility features being overlooked. By engaging the low vision and blindness community in planning and design, the New South Wales Government can create spaces that truly meet their needs. Webber emphasises the value of community consultation, advocating that “developing community consultation processes to ensure public toilets meet local needs”, can foster empathy and support for accessible facilities¹. This aligns perfectly with our recommendations for increased engagement.
- **Guide Dog relief areas:** public spaces lack safe, accessible relief areas for Guide Dogs. Providing designated, public accessible relief spaces will support the independence and comfort of Guide Dog Handlers, allowing them to move freely and confidently in public places.
- **Insufficient public toilet locations:** the lack of accessible public toilets, especially in transport networks and recreational spaces restricts movement and independence for people with low vision or blindness. Expanding the number of accessible toilets in key public areas will support freedom of movement and enable everyone to participate fully in their communities.



Economic and social benefits of accessible toilets.

- 1. Drives economic growth:** accessible public toilets support a more inclusive society where everyone can participate. Research from Deloitte Access Economics estimates that implementing more inclusive public spaces could add \$12.7 billion to Australia's economy each year³. Accessible public spaces encourage greater involvement in the community from people with low vision or blindness and builds a stronger, more diverse economy.
- 2. Creates job opportunities:** accessible toilets make it easier for people with disabilities to work, study and engage in other activities, which increases employment and independence. Deloitte's research suggests that inclusive public spaces could boost Australia's GDP by about \$1.2 billion through increased workforce participation³. Investing in accessibility reduces the reliance on welfare services and promotes opportunities for everyone to contribute to the economy.
- 3. Improves health and well-being:** accessible toilets support the health, safety, and dignity of everyone, especially people with disabilities. Deloitte estimates the health benefits of social inclusion contribute to \$6.5 billion to Australia's economy annually, including lower demand on the public health system³. Accessible facilities help people feel confident and welcome, creating a healthier, more connected community.
- 4. Reduces social service costs:** accessible toilets help people with disabilities participate in their community and reduces the reliance on social services. Equal access to community spaces means less demand for health, welfare and unemployment services, saving costs for governments and communities. Accessible public toilets support a more independent and self-sufficient population.
- 5. Promotes fair economic growth and equality:** accessible public toilets ensure everyone can enjoy public spaces. Studies show that reducing inequality strengthens economic stability and overall community well-being. By investing in accessible infrastructure, we can create a more resilient society where everyone can thrive.

3 Deloitte Access Economics. (2019). 'The economic benefits of improving social inclusion: A report for SBS.' Retrieved 27 October 2024.

Case studies.

International accessibility.

The 10 Most Accessible Cities report by the Valuable 500, a global network focused on disability inclusion, highlights the progress made by several cities worldwide to improve accessibility⁴. Cities like Singapore, Amsterdam, Tokyo and Paris lead the way with their inclusive designs. These cities offer important features that can guide the development of accessible public toilets in Australia.

- 1. Universal design for all users:** these cities have designed accessible public spaces for everyone, including seniors, people with mobility challenges and people with disabilities. Features like spacious stalls, handrails and emergency call buttons make toilets safer and easier to use.
- 2. Clear wayfinding and signage:** accessible signage, like high-contrast text, Braille and clear symbols help people with low vision or blindness to navigate public spaces. Cities like Tokyo and Singapore also use bilingual or multilingual signage to support people who speak different languages.
- 3. Auditory and tactile navigation:** cities like Amsterdam and Tokyo use auditory signals and tactile paving to assist people with low vision or blindness to navigate public spaces independently.

4. Inclusive attitudes and awareness: the Valuable 500 report emphasises that an inclusive environment is about more than just design, it's also about respect and understanding⁴. Cities with accessible public spaces educate businesses and services to support people with disabilities, helping to create a more inclusive community.

5. Accessible emergency support systems: leading cities have added emergency call buttons and voice or sound-based confirmation systems in public toilets, to help people with disabilities feel safe using these facilities.

The city of Sydney has already made great progress towards accessibility with features like wheelchair-accessible transport, accommodation and the Legible Sydney Wayfinding System for people with low vision or blindness. However, there is more to be done to improve public toilets for everyone.

To meet the needs of Australia's growing, diverse population and especially people with low vision or blindness, we need policy changes. Public toilet design standards should follow the best practices employed in leading cities around the world. By adopting universal design principles, clear signage, emergency systems and promoting inclusion, the NSW Government can set an example for Australia and the world for creating accessible public spaces.

4 Valuable 500. (2022). '10 Most Accessible Cities Report.' Retrieved 7 November 2024.

Crows Nest Metro station.

In a recent visit to the new Crows Nest Metro station on Sydney's Metro City line, a group from Guide Dogs NSW/ACT, including 10 participants with low vision or blindness using various mobility aids like long canes and Guide Dogs, had the chance to explore and familiarise themselves with the station's accessibility features. This visit aimed to ensure that Australia's only fully accessible railway meets the needs of everyone, including the low vision and blindness community.

The group explored key features like escalators, lifts, toilets, customer help points and emergency facilities. Sydney Metro's accessible design stood out, with levelled access between platforms and trains, clear Braille signage, tactile flooring and hearing loops that improve independence for everyone.

Positive feedback and opportunities for improvement.

Feedback from participants was positive and the following suggestions were given to make the accessible features, even more user-friendly:

- **Toilets:** adding a gentle, audible, "door locked" message will help users know the door is securely locked and provide peace of mind. Adjusting the door sensor to prevent Guide Dogs from triggering it accidentally will also make closing the door smoother for users.
- **Emergency call system:** an audible message that says, "help is on the way", is a great addition when someone uses the emergency button in the accessible toilet. This message will reassure users that they've pushed the correct button and assistance is coming.

This experience highlights the value of gathering direct feedback from users to keep improving accessibility in ways that benefit everyone.





Unisex

Female

Female

Female

Unisex
Toilet
WC

Man with cane and backpack

Woman in white coat and green scarf

Man kneeling on the ground

Woman in black jacket and grey pants

Man in blue jacket and cap

Dan Searle's story.

Dan lost most of his sight over 21 years ago and since then, he has been both a cane user and a Guide Dog Handler. When he travelled to Japan, he was impressed by how accessible the public toilets were.

“Using public toilets can be challenging, but in Japan, it felt like they knew this and tried to make it easier. The signs were great, clearly labelled in both Braille and tactile print. Not all blind people read Braille but may recognise raised printed letters. I liked the small details too, like clearly marked buttons for ‘open’, ‘close’ and ‘emergency’. Tactile maps outside the toilets gave an overview of the layout, making it easier to find things once inside.

Audio announcements were another great feature, letting me know if the toilet was occupied and if the door was locked. This can cause stress with public toilets, as I’m never sure if the door is locked. Audio helped to navigate and gave me a sense of independence and safety, which would be great for us here in Australia.”



Dan's experience shows how simple additions can improve a person's safety and confidence when accessing the community. We urge the government to improve the accessibility of public toilets for people with low vision or blindness, like Dan. Everyone deserves safe, comfortable and accessible facilities.

Recommendations.

1. Involve the community in public toilet planning and design.

Set up structured ways to gather input from people with low vision or blindness and people with disabilities. This could include surveys, focus groups and community meetings to ensure the needs of people who use these facilities are heard. Experiences like our visit to Crows Nest Metro station show how valuable real feedback is in designing spaces that work well for everyone.

2. Mandate accessible public toilets as a legal requirement.

Introduce legislation to ensure public toilets are accessible, especially in areas like transport hubs, public parks and other highly frequented public spaces. Recognise public toilet access as a basic human right to guarantee reliable and consistent access to essential facilities.

3. Add useful navigation and safety features to public toilets.

- NSW Government advocates for the National Construction Code and Australian Standards to include tactile maps, clear signage and audible guides in all public toilet designs through the Building Ministers' Meetings.
- Audible door lock signals. Adding a simple sound when the door is locked will give users the confidence that the toilet door is secure without needing visual confirmation.
- Emergency call feedback. A message like, "help is on the way", when the emergency call button is pressed will reassure users that assistance is coming, giving them peace of mind.

4. Require all public spaces to include safe, accessible areas with grass or designated spots for Guide Dogs to relieve themselves.

These areas should be easy to find and located away from busy traffic so Guide Dog Handlers to care for their dogs safely and conveniently.

5. Implement requirements for local councils to perform regular accessibility checks on public toilets and involve people with low vision or blindness in the review process.

Routine feedback and audits, like our Crows Nest Metro Station visit, help keep facilities current and ensure they continue to meet the community's evolving needs.

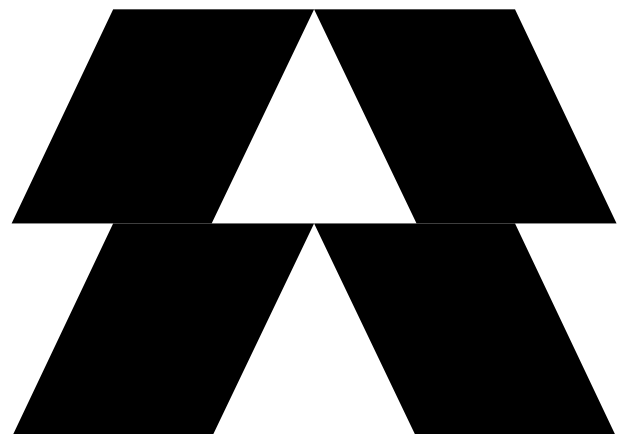
6. Implement education and a public awareness campaign.

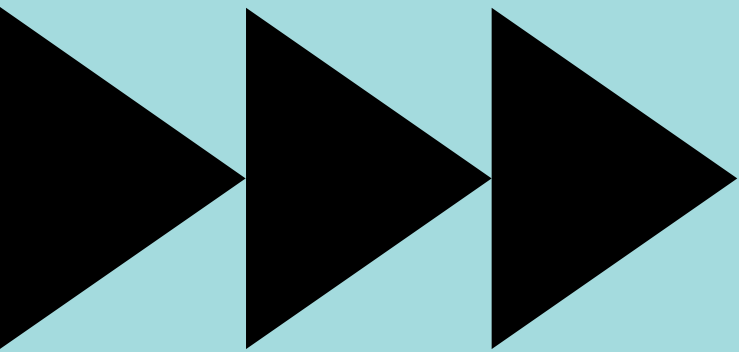
Partner with tourism boards and local businesses to promote accessible public toilets through apps, websites and signage. Raise awareness within the low vision and blindness community to encourage participation in their communities.



Sources.

- Vision 2020 Australia. (n.d.). [‘Eye health in our region.’](#) Retrieved 26 October 2024.
- Guide Dogs Australia. (2023). [‘Guide Dog toileting area guidelines.’](#) Retrieved 27 October 2024.
- Guide Dogs NSW/ACT. (n.d.). [‘Annual reports.’](#) Retrieved 26 October 2024.
- Guide Dogs NSW/ACT. (n.d.). [‘Guide Dog access and etiquette.’](#) Retrieved 27 October 2024.
- Commonwealth of Australia. (1992). [‘Disability Discrimination Act 1992.’](#) Retrieved 27 October 2024.
- New South Wales Government. (2014). [‘Disability Inclusion Act 2014.’](#) Retrieved 27 October 2024.
- New South Wales Government. (1998). [‘Companion Animals Act 1998.’](#) Retrieved 27 October 2024.
- Australian Building Codes Board. (n.d.). [‘National Construction Code.’](#) Retrieved 27 October 2024.
- Standards Australia. (n.d.). [‘AS 1428.1 – Design for Access and Mobility.’](#) Retrieved 27 October 2024.
- New South Wales Government. (1977). [‘Anti-Discrimination Act 1977.’](#) Retrieved 27 October 2024.
- Minister for Disability Inclusion, & Minister for Transport. (2024). [‘Pawsome day out on the new Sydney Metro.’](#) NSW Government. Retrieved October 28, 2024.





Guide Dogs.

We're here whenever you need us.

📍 7-9 Albany Street,
St Leonards NSW 2065

☎ 1800 436 364

🌐 www.nsw.guidedogs.com.au