

5th May 2025

Ms Alice Wood
Principal Council Officer
Committee Office
Legislative Council

Sent via email: PortfolioCommittee8@parliament.nsw.gov.au

Dear Ms Wood,

RE: Response to Supplementary Questions – Portfolio Committee No. 8 Inquiry into Public Toilets

Thank you for the opportunity to provide additional information to Portfolio Committee No. 8 – Inquiry into Public Toilets. Please find below my response to the supplementary questions, submitted in addition to the Disability Council NSW's original submission and my appearance as a witness before the Committee.

1. Do you think an audit of accessible public toilets managed by councils and state government should be undertaken, and if so, what are the basic standards that should be included?

Yes, Disability Council NSW, 'The Council,' strongly supports and believes that all local councils and the state government should urgently undertake an audit of all accessible toilets, requesting that this be taken further and reviewed where there are standard public toilets without an accessible toilet.

It should assess availability, compliance with Australian Standards (AS1428), functionality

The NCC outlines the types of buildings that are required to have accessible toilets, including public buildings, commercial buildings, and certain residential buildings.

AS 1428.1; This standard provides the detailed design specifications for accessible toilets, including:

- Clear circulation space: A minimum space for wheelchair users to manoeuvre.
- Grabrails: Placement and height requirements for grabrails.
- Toilet seat height: Between 460 mm and 480 mm.
- Flush button location: Specific height and location requirements.

The Disability Council NSW provides independent advice to the NSW Government on policies that advance the equality, inclusion and interest of people with disability
www.disabilitycouncil.nsw.gov.au

- Signage: Braille and tactile signage requirements to identify accessible facilities.
- Water taps: Lever handles or sensor plates.

The Disability (Access to Premises - Buildings) Standards 2010 (DAPS) also references AS 1428.1 and includes specific requirements for accessible toilet access and use. (including MLAK access), cleanliness, maintenance standards, signage, and proximity to public transport, accessible parking, and major venues.

2. What is the current level of community engagement by local and state governments when designing new public toilets?

Community engagement is variable and often inadequate. Consultation with people with disability and local access advisory groups should be mandatory during the planning stages to ensure facilities meet real-world needs.

2. What specific features are needed to ensure compliance with the Australian Standards for accessible facilities?

To ensure accessible public toilets meet the requirements of the Australian Standards and support safe, independent use by all individuals, several key design and safety features must be consistently incorporated, including:

- Minimum circulation space for mobility devices
- Grab rails positioned to Australian Standards
- Accessible basins, taps, and flush controls
- Alarm systems in case of emergencies
- Automatic doors or lightweight manual doors where automation is not possible

3. Is the signage for accessible toilets clear for people with vision impairments or intellectual disabilities?

Current signage is often inadequate, especially for people with vision impairments or intellectual disabilities. Signs usually lack high-contrast colours, tactile elements such as raised text or braille, and universally recognised symbols. This can make it difficult for individuals to find accessible toilets independently. For those with intellectual disabilities, signage that includes clear images or pictograms can significantly improve understanding. Enhancing toilet signage through co-design with people with disabilities would improve clarity, reduce confusion, and increase independence in public spaces.

Best practice includes:

- High-contrast, large-font signage
- Use of Braille and tactile markers
- Clear pictograms
- Logical placement close to entrances and consistent wayfinding

5. Are there any recommendations for improving accessibility in urban areas?

Improving accessibility in urban environments requires a comprehensive approach focusing on upgrading infrastructure and enhancing information systems.

Key recommendations include retrofitting existing public toilets to incorporate accessible features that meet modern standards. Increasing the number of standalone, gender-neutral accessible toilets can provide privacy, safety, and dignity for a diverse range of users, including people with disabilities, caregivers, and families.

Consistent use of MLAK (Master Locksmiths Access Key) locks on accessible toilets can enhance security and usability.

6. Are there any recommendations for improving accessibility in regional areas?

Accessibility in regional areas is significantly limited due to a lack of permanent infrastructure and the considerable distances between facilities. Many communities across regional and remote Australia face challenges where accessible public toilets are either non-existent, poorly maintained, or located too far apart to be practical for people with disabilities.

To address this issue, dedicated funding or subsidies should be provided to support access to mobile accessible toilets, particularly for community events, festivals, or temporary gatherings without infrastructure. This solution adequately meets short-term needs and enhances community inclusion. Furthermore, all new regional developments—such as town centres, transport hubs, and tourism infrastructure—should be required to include accessible facilities as a standard practice rather than an afterthought.

A suggestion could be to introduce government incentives and targeted grants to assist local councils in upgrading aging public toilet facilities to meet modern accessibility standards. Without such investment, regional Australians with disabilities will continue to encounter barriers that prevent full participation in community life.

7. What are the most common accessibility challenges people with disability face when using public toilets?

People with disability experience a range of barriers when attempting to use public toilets. These challenges, which impact safety, dignity, and independence, most commonly include:

- Heavy manual doors
- Inaccessible layouts (e.g., inadequate circulation space)
- Poor hygiene deterring safe use
- Inconsistent access (locked toilets without clear access protocols)
- Lack of accessible adult change facilities

8. How would increasing the number of accessible toilets improve participation and independence?

Increasing the number of accessible toilets would significantly improve the independence, dignity, and quality of life for people with disabilities. When accessible facilities are available and easy to locate, individuals can confidently leave their homes, knowing their basic needs can be met within the community. This enhanced accessibility allows greater participation in employment, education, social, cultural, and recreational activities. Accessible toilets are essential for fostering inclusion, reducing the risk of isolation, and minimising the need for individuals to rely on others for support. Ultimately, this promotes personal autonomy, enhances mental and physical health outcomes, and ensures equal access to public life. Accessible infrastructure sends a strong message that people with disabilities are welcome and valued in all areas of society.

9. Could you explain how the MLAK key scheme works, and why it's currently underused?

The MLAK (Master Locksmiths Access Key) scheme allows people with disabilities access to locked accessible toilets. However, several barriers limit the scheme's impact and uptake across the community.

One key issue is low awareness. Many people with disabilities, councils, and businesses are unaware the scheme even exists. Those who do know about it may not fully understand how or where to obtain the key. Although the simplest method is via the Master Locksmiths Association website, several unrelated websites provide information, leading to confusion and a fragmented user experience.

Cost is also a prohibiting factor. Even a relatively modest cost can pose a barrier for those on disability or aged pensions, especially with price increases for MLAK keys and locks scheduled from July 2025. This could put the scheme out of reach for some of the people it's intended to support.

From a usability standpoint, remembering and manually operating a physical key is another common challenge. For many users—particularly those with fine motor difficulties or cognitive disabilities—carrying a physical key or turning one in a manual lock can be difficult or impossible. Moreover, if users forget to bring their keys, they are effectively excluded from using these facilities entirely.

Introducing a digital or app-based MLAK system could significantly improve access. It would allow more people to operate locks with less physical effort, reduce the dependence on carrying a physical key, and support modern, accessible design principles.

Wider adoption and promotion of the MLAK scheme are essential. Greater consistency across councils and public venues, supported by a national awareness campaign and integration into digital accessibility tools, would improve equity of access and support increased community inclusion.

10. What specific improvements would you like to see in the National Public Toilet Map?

The National Public Toilet Map requires significant updates to meet modern standards, and user needs and improve accessibility and usability for people with disabilities.

A key recommendation is developing a fully accessible mobile application for Android and iOS platforms. This would provide a more seamless, user-friendly experience compared to the current website interface, which can be challenging for those using assistive technology to navigate on smaller screens. The app should include enhanced search and filtering options, such as easily locating MLAK-equipped toilets and adult change facilities.

Critically, the app should support real-time updates on toilet availability and operating status—information that would be particularly helpful during events, emergencies, or maintenance closures. Users should also be able to report issues (such as cleanliness or access problems) through the app to help keep data current and relevant.

Given that internet connectivity may be limited in regional or remote areas, the app should offer the ability to download maps for offline use. This would ensure people travelling in unfamiliar locations or areas with poor service can still find accessible facilities.

Regarding data accuracy, a national framework for regularly verifying toilet data in partnership with local councils, transport hubs, and facility operators would ensure the information is up-to-date and trustworthy. This includes confirming whether facilities are MLAK-equipped, have showers and/or change tables, are gender-neutral, or support other inclusive features.

These improvements would ensure the National Public Toilet Map becomes a practical, inclusive, and widely used tool, ultimately improving independence, dignity, and access to the community for people with disabilities.

11. How important is the inclusion of automatic doors and well-equipped change facilities?

Including automatic doors and well-equipped changing facilities is not merely a convenience; it is essential for upholding the rights, dignity, and independence of individuals with disabilities.

Automatic doors eliminate a significant barrier for those who use mobility aids such as wheelchairs or walkers and those with limited upper-body strength, fine motor skills, or chronic pain. Without automated entry, many individuals are forced to rely on others for assistance or may avoid using public facilities altogether, compromising their autonomy and ability to engage in community life.

Well-equipped changing facilities—including changing facilities, ceiling hoists, and suitable hygiene amenities—are essential. These features not only support individuals with high physical support needs but also their caregivers and support workers, who require safe and functional environments to provide necessary assistance.

The lack of such infrastructure often forces people to change in unsafe or undignified conditions, such as the floor of public toilets. This issue is both a human rights and a public health concern.

Providing these features in all newly constructed or upgraded public restroom facilities sends a strong message of inclusion and accessibility. It helps ensure that everyone, regardless of their mobility or support needs, can participate fully and equally in public, social, and civic life.

We trust the views of the Council will be incorporated in the final strategy.

Thank you once again for the opportunity to provide feedback.

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