

Guide Dogs.

Guide Dogs NSW/ACT

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Public toilets inquiry – post-hearing responses

About Guide Dogs NSW/ACT

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. For more than 65 years, we have supported people with low vision or blindness to navigate their communities safely and independently. We are proud to be the leading provider of Guide Dogs and Orientation and Mobility services in NSW and the ACT.

Post-hearing responses

Are you aware of any dedicated relief areas for assistance dogs?

- **Sydney Domestic Airport:** Facilities are available both landside within Terminal 2 (T2) and externally in the car park near the T2 arrivals entrance.
- **Sydney International Airport:** An airside toileting area is located near the arrivals/immigration zone.
- **University of Technology Sydney (UTS):** A designated facility is located directly outside Building 1 (UTS Tower).
- **Temporary Event Locations:** Facilities have also been provided at select temporary venues, such as the Westpac Open Air Cinema during the “Touch” event.

(6) Why are Guide Dog relief areas important in public toilet planning?

- **Productivity**

Providing a safe and direct route for employees to toilet their Guide Dogs within the workplace is essential. Unfortunately, we are aware of instances where individuals have resigned from their jobs due to the impracticality - and at times, the safety risks - associated with toileting their Guide Dogs, particularly in central business district (CBD) locations.

- **Participation**

Accessible toileting facilities for Guide Dogs support greater community participation. Handlers are more likely to attend public events and engage in community life when they can be confident that appropriate toileting spaces are available.

- **Demand**

The number of Assistance Animal handlers is growing steadily. As a result, there is a clear and ongoing need for increased availability of designated toileting areas to meet current and future demand.

(2) 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?

Audit and Review of Accessible Public Toilets

Yes, a regular audit of accessible public toilets—particularly those managed by local councils and state government—is essential to ensure their ongoing usability, safety, and accessibility.

Both the functionality of the facilities and the user experience, especially for people who are blind or have low vision, should be reviewed with consideration to the following factors:

- **Path of Travel:** Are the pathways leading to the facilities safe, continuous, and free of hazards?

- **Wayfinding Signage:** Is the signage effective, accurately placed, and accessible for people who are blind or have low vision?
- **Luminance Contrast:** Do fixtures and fittings within the facility provide adequate luminance contrast to aid navigation and use?
- **Door Mechanisms:** Are doors easy to open, close, lock, and unlock? Automatic doors can pose challenges for users who are blind or have low vision.
- **Internal Layout:** Is the internal layout consistent and intuitive? Variability in the design of toilet facilities can create significant barriers for users with low or no vision.

Regular assessment and improvements in these areas will support greater accessibility, safety, and independence for all users.

(3) What is the current level of community engagement by local and state governments when designing new public toilets?

- Guide Dogs NSW/ACT is currently involved in consultations with TfNSW Safe Accessible Transport Program (SAPT) with their design concepts for train stations that are being upgraded. The upgrade of the toilets is a critical topic for all new station upgrades. We offer advice on making the new toilets more accessible and functional for people who are blind or have low vision.
- Being a member of the TfNSW Accessible Transport Advisory Committee (ATAC), Guide Dogs NSW/ACT can also offer advice on making toilets more accessible and functional for people who are blind or have low vision in projects that are presented to the committee.

(4) What are the key challenges people with low vision face when using public toilets?

Navigating public toilet facilities presents a range of challenges for people who are blind or have low vision. Key concerns include both accessing the facilities and effectively using the elements within them.

1. Location and Access

- Difficulty locating the toilets and identifying safe, accessible paths to reach them.

2. Internal Navigation and Usability

- **Placement of Fixtures:** Uncertainty about the location of key elements such as the toilet flusher, toilet paper, bins, and taps. Sensor-based systems (e.g. soap, water, and hand dryers) can be particularly problematic due to their inconsistent activation and lack of tactile cues.
- **Doors:** Challenges in identifying how to open, lock, and unlock toilet doors. Automatic doors, while intended to improve accessibility, can often be unreliable or confusing for users who are blind or have low vision.
- **Inconsistent Layouts:** A lack of standardisation in internal toilet layouts makes it difficult for users to orient themselves, increasing the risk of discomfort or unsafe use.
- **Poor Luminance Contrast:** Insufficient contrast between fixtures and backgrounds can make it difficult to distinguish key features within the space.
- **Lack of Orientation Cues:** Few or no tactile cues to help users understand and navigate the layout.
- **Inconsistent Lighting:** Poor or uneven lighting can further impair visibility and spatial awareness, especially for people with low vision.

3. Space Constraints and Suitability

- Some cubicles are too small to accommodate both a person and their Guide Dog, while accessible toilets can sometimes be too large and difficult to navigate due to their more open layouts.
- As a result, many people who are blind or have low vision prefer to use standard toilets, despite them not always being the most suitable option.

(5) Could you explain how tactile or audible features improve safety and independence?

Tactile and Audible Accessibility Features

Improving the tactile and audible features within public toilet facilities is essential to ensure usability and independence for people who are blind or have low vision.

Tactile Features

- **Braille and Tactile Signage:** Clear, well-placed braille and tactile signage can help users confirm they are at the correct toilet.
- **Tactile Layout Maps:** The inclusion of braille tactile maps at the entrance would greatly assist in understanding the layout of the facilities, enhancing orientation and safety.
- **Tactile Fixtures and Fittings:** Manually operated taps, soap dispensers, and hand dryers are strongly preferred over sensor-activated options, which often lack consistency and tactile feedback.

Audible Features

- **Locking Mechanisms:** Simple, reliable locking systems are critical. The addition of audible cues could improve user confidence when using automatic doors and locks. This could include:
 - A clear "click" sound indicating the door has locked or unlocked.
 - An audible announcement confirming the door status, such as "Toilet locked" or "Toilet unlocked."
- **Orientation Announcements:** Upon entry, an optional audible announcement describing the layout of the space could significantly aid orientation, especially in unfamiliar or inconsistent environments

(7) How should NSW update its regulations or building codes to better reflect access needs?

- **Co-Design with Lived Experience**
Engaging people with lived experience of blindness or low vision in the design process of public toilets is critical. Co-design ensures the resulting spaces are not only compliant but truly functional, safe, and intuitive for all users.
- **Enhanced Luminance Contrast**
While the Australian Standards mandate a **minimum 30%** luminance contrast, this baseline is often treated as the default target. In practice, aiming for a higher contrast ratio significantly improves the visibility of fixtures and fittings, enhancing usability for people with low vision. Designers are

encouraged to exceed the minimum to create genuinely accessible environments.

- **Functional and Consistent Lighting**

Lighting should be uniform, free from glare, and sufficient to clearly illuminate key features within the space. Poor or inconsistent lighting can severely impact orientation and safety for users with low vision.

Accessible Toilets in All Buildings

Every public building should include fully accessible and functional toilet facilities.

These should feature:

- Appropriate signage (including braille and tactile elements),
- Effective orientation cues, and
- Consideration of space, layout, and usability for people who are blind or have low vision.

(8) What lessons can we learn from examples like Crows Nest Metro?

Prior to operation, we conducted a ‘familiarisation’ activity at Crows Nest Metro station involving 20 staff members who are blind or have low vision. We received overwhelmingly feedback concerning the station’s toilet facilities, highlighting the importance of accessible and inclusive amenities.

Feedback included:

- **Door Lock:** Many people responded that they would feel anxious or uncertain not knowing how to confidently ‘lock’ the door.
- **Sensor Doors:** Others had issues closing the Automatic toilet doors with sensor due to their Guide Dog setting off the sensor.
- **Getting assistance** - the lack of audible information around the use of the emergency button in the accessible toilet was also concerning. They needed confirmation that emergency button was activated, and assistance was on the way.
- **Tactile map** for overall station layout – participants highly valued the tactile maps that Guide Dogs NSW/ACT created to give them an overview of the Crows Nest Station.

- **Tactile Map for the toilet layout** (outside each toilet) was suggested. We have this tactile map in our Guide Dogs NSW/ACT St Leonards office (see below).



Image Description: Braille and Tactile signage as well as tactile layout of the female toilets at Guide Dogs NSW/ACT St Leonards office.

Thank you again for inviting Guide Dogs NSW/ACT to provide evidence at the NSW Government Public toilets inquiry. Please do not hesitate to contact me if you have any further questions.

Kind regards,

Jen

Contact Information

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