

National Principles for the regulation of Assistance Animals

Children and Young People with Disability
Australia's Submission to The Department
of Social Services draft National Principles
for the regulation of Assistance Animals
consultation paper

*"My daughter has two pieces of
equipment that go everywhere
with her. Her wheelchair, which
gave her the means, and her
assistance dog, which gave her
the motivation to leave the
house again"* Parent of child with
disability, May 2025.

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Children and Young People
with Disability Australia

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A note on terminology:

Throughout this submission, Children and Young People with Disability Australia (CYDA) uses person-first language, e.g., person with disability. However, CYDA recognises many people with disability choose to use identity-first language, e.g., disabled person.



Content note: This submission *references ableism*.

Acknowledgements:

Children and Young People with Disability Australia would like to acknowledge the traditional custodians of the Lands on which this report has been written, reviewed and produced, whose cultures and customs have nurtured and continue to nurture this Land since the Dreamtime. We pay our respects to their Elders past and present. This is, was, and always will be Aboriginal Land.



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Summary of recommendations

Recommendation 1: Fund a national initiative to deliver a coordinated Assistance Animal Framework that embeds and implements the National Principles across the states and territories.

- a. Streamline access to assistance animals
 - Align NDIS policies, guidelines and application processes with the NDIS Act and the National Principles.
 - Provide clear and accessible information on a central government website.
- b. Launch a national public education campaign
 - Build public understanding of the role and benefits of assistance animals, the rights of children and young people with disability who use them, and appropriate ways to interact with assistance animals in public spaces.
 - Raise awareness of the legal rights of assistance animals and their handlers among the general public and organisations.
- c. Clarify the definition of Assistance Animals
 - Ensure consistent, accessible definitions are included in the public education campaign and related materials.

Recommendation 2: Recommendations based on draft principles

Strengthen each National Principle through co-designed, consistent, and accessible implementation

- a. Principle 1: National accreditation for trainers and organisations
 - Commission a co-designed review, led by people with lived experience as handlers and trainers, to assess the suitability of the Certificate IV in Animal Behaviour and Training – Assistance Animal stream as the national standard.
 - Ensure the qualification is accessible through TAFE at low or no cost, with transition supports including recognition of prior learning for existing trainers.
- b. Principle 2: Minimum training standards for assistance animals
 - Undertake additional consultation to clarify and define appropriate training methods, tasking expectations, and ethical approaches that prioritise both animal welfare and the needs of people with disability.

- Ensure these standards are informed by lived experience and are flexible enough to accommodate different disability support needs and animal types.
- c. Principle 3: Single national Public Access Test (PAT)
- Develop a fit-for-purpose national PAT through a co-design process involving assistance animal users, trainers, disability representative organisations, and animal behaviour experts.
 - Ensure the PAT is nationally consistent, accessible and culturally safe, with clear guidance for assessors and handlers.
- d. Principle 4: Evidence of disability and need
- Co-design evidence requirements with people with disability, trainers, and disability representative organisations to ensure the process is consistent, rights-based, and easy to understand.
 - Establish a safe, independent complaints mechanism for people who are inappropriately or repeatedly asked to provide evidence in public settings.
- e. Principle 5: National identity card and logo
- Ensure the card and logo are government-issued, easily recognised, and supported by a streamlined, cost-free transition process.
 - Extend the card's validity period to reduce administrative burden and avoid unnecessary re-application.
- f. Principle 6: Animal welfare
- Adopt the Five Domains model as the national benchmark for welfare standards.
 - Co-design implementation to reflect both animal welfare and the access needs of people with disability.

Introduction

Children and Young People with Disability Australia (CYDA) is the national representative organisation for children and young people with disability aged 0 to 25 years. CYDA has extensive national networks of young people with disability, families and caregivers of children with disability, and advocacy and community organisations.

Our vision is that children and young people with disability in Australia will fully exercise their rights, realise their aspirations and thrive in all communities. We do this by:

- Raising community attitudes and expectations
- Championing initiatives that promote the best start in the early years for children with disability, and their families and caregivers
- Leading social change to transform education systems to be inclusive at all points across life stages
- Advocating for systems that facilitate successful life transitions to adulthood
- Leading innovative initiatives to ensure the sustainability and impact of the organisation and the broader sector.

CYDA welcomes the opportunity to provide a response to The Department of Social Services' (DSS) consultation paper on the Draft National Principles. We commend the Government in developing draft Assistance Animals Principles to ensure there are consistent rules across states and territories.

Our submission builds on the Joint Statement led by Australian Autism Alliance and supported by 11 other disability representative organisations, including CYDA¹.

The submission incorporates evidence from both peer-reviewed and grey literature, as well as insights from a CYDA focus group held on 8 May 2025. This group included four participants: three parents or caregivers of children with disability and one young person with disability. It also includes perspectives from two interviews with assistance dog trainers, conducted on 6 and 13 May 2025.

Direct quotes in this submission are drawn from the findings of the consultation with young people, families and caregivers. Quotes are indented from main text, italicised and in inverted commas, anonymised to protect privacy and minimally edited for brevity and/or clarity.

Additionally, this submission was shaped by CYDA staff, the majority of whom have personal and/or family experience of disability, and/or lived experience of Assistance

¹ Disability Advocacy Network Australia, 2025. [Joint Statement Calling for People with Disability's Access to Assistance Animals to be Protected](#)

Animals. It was also reviewed by a young person with disability to help ensure that the voices of young people are meaningfully represented.

Submission structure

The submission is structured in two parts: Each part leads with our recommendations and is followed by a more detailed response.

Part 1 outlines the three recommendations that fall within our key recommendation of implementing an overarching framework to embed these principles nationally. These include streamlining access, a public education campaign and clarifying the definition of assistance animals.

Part 2 affirms CYDA's broad support for the proposed six Draft National Principles and outlines recommendations that would further shape each of the principles. It addresses each principle separately.



Part 1

Recommendation 1: Fund a national initiative to deliver a coordinated Assistance Animal Framework

Recommendation 1: Fund a national initiative to deliver a coordinated Assistance Animal Framework that embeds and implements the National Principles across the states and territories.

- a. Streamline access to assistance animals
 - Align NDIS policies, guidelines and application processes with the NDIS Act and the National Principles
 - Provide clear and accessible information on a central government website.
- b. Launch a national public education campaign
 - Build public understanding of the role and benefits of assistance animals, the rights of children and young people with disability who use them, and appropriate ways to interact with assistance animals in public spaces.
 - Raise awareness of the legal rights of assistance animals and their handlers among the general public and organisations.
- c. Clarify the definition of Assistance Animals
 - Ensure consistent, accessible definitions are included in the public education campaign and related materials.

CYDA agrees with DSS that assistance animals play a significant role in enabling a person with disability to live independently, complete daily tasks and enjoy a sense of wellbeing.

Assistance animals can support children and young people with disability with communication, mobility, sensory regulation, and community participation. In the blind and d/Deaf community, assistance animals often support children and young people with mobility, acting as a guide and supporting them to explore their environment safely. Assistance animals can alert owners to potentially dangerous situations, manage daily tasks and provide functional daily assistance. Assistance animals are

also evidenced to provide therapeutic benefit for individuals with Post-Traumatic Stress Disorder (PTSD)².

CYDA recommends the Department of Social Service (DSS), or other suitable government department, be resourced to provide oversight and management of a framework that guides implementation of the national assistance animal principles. A national overarching framework is particularly critical where there is differing legislation (for instance those which govern animal welfare) being used to meet a single principle. This recommendation was put forward in the following joint statement CYDA supported in March 2025.

*We strongly urge Minister Rishworth and the Australian Governments (in partnership with all state and territory disability Ministers) to co-design with the disability community, particularly those who have assistance animals, a **National Assistance Animal Framework** that embeds, implements, and actualises the principles to improve the national pathways to access and accredit assistance animals.³*

The Department of Social Services (DSS) currently administers Australia's Disability Strategy. Within the "Personal and Community Support" section, Policy Priority 4 outlines support for people with disability to access assistive technology. While assistance animals are not explicitly listed in the strategy, the NDIA defines them as a form of assistive technology. Given this, DSS may be well positioned to administer a national assistance animal framework—covering both NDIS and non-NDIS participants—subject to any future changes in responsibilities resulting from the transfer to the newly formed, Department of Health, Disability and Ageing.

Before addressing each of the proposed draft principles (in part 2 of this submission), the remainder of part 1 of this submission outlines the current processes around assistance animals and three sub recommendations for the overarching recommendation of a fully resourced framework to embed the principles.

a. Streamlined processes to access assistance animals

Streamlining the current confusing and inequitable approach of accessing assistance animals must be a key part of an overarching National Assistance Animal Framework. This should include an official website that captures the key steps and funding process in an accessible format for people with disability and their families and caregivers.

² Forbes et al (eds), 2020. Effective treatments for PTSD: Practice guidelines from the International Society for Traumatic Stress Studies, 417, 418–450

³ Disability Advocacy Network Australia, 2025. [Joint Statement Calling for People with Disability's Access to Assistance Animals to be Protected](#)

There are currently three key methods of obtaining an assistance animal.

1. Self-train method

A person with disability or their caregivers generally purchase, or sometimes adopt, a suitable animal and train them to a recognised standard and to perform disability specific tasking. Two variants to this method are:

- a. Engage a trainer to coach the handler to enable the animal to meet Public Access Test (PAT) standard (offered by two state/territories and some non-government organisations) and administer the PAT.
- b. Completely self-train to the standard⁴ required under the *Disability Discrimination Act 1992 (Cth)* (DDA), which can be used in cases where the animal has not undertaken a PAT. See footnote below.

2. Provider organisation

A person with disability or their caregivers apply to an organisation to receive a fully trained and certified animal that is transferred to them to become the primary handler.

3. Hybrid method

A person with disability or their caregivers apply to an organisation to receive an animal that lives with them but attends regular training away from the home until it meets standard to pass the PAT.

As well as the multiple methods used to acquire/train an assistance animal, there are a variety of funding possibilities that range from fully self-funded, to fully or partly funded by an external organisation or government agency. Some of these are discussed in following two sections.

NDIS access/funding

NDIS participants can apply on a case-by-case basis to receive funding to access an assistance animal using one of two pathways. First, once they and/or their care team establish that an assistance animal would benefit their disability related needs and be

⁴ Aust. Government, [DISABILITY DISCRIMINATION ACT 1992 - SECT 9](#) This section defines an assistance animal and includes self-trained animals in (2)c.

“(2) For the purposes of this Act, an *assistance animal* is a dog or other animal:

(a) accredited under a law of a State or Territory that provides for the accreditation of animals trained to assist a person with a disability to alleviate the effect of the disability; **or**

(b) accredited by an animal training organisation prescribed by the regulations for the purposes of this [paragraph](#); **or**

(c) trained:

(i) to assist a person with a disability to alleviate the effect of the disability; **and**

(ii) to meet standards of hygiene and behaviour that are appropriate for an animal in a public place.

See also, [DDA, SECT 54A](#). This section makes it legal for an animal to access public places without evidence of passing a PAT.”

a suitable support, they find an organisation that can provide an assistance animal to suit their needs. The participant, their care team and the provider organisation can coordinate an application to NDIA to fund the acquisition and training of an animal until it becomes accredited and can be placed with the participant. There are several barriers to this approach, including the resource-intensive NDIA evidence requirements and the limited number of training organisations with expertise in navigating the system. A further barrier is the lack of knowledge within care teams, as highlighted by Long et al. (2021). They found Australian Occupational Therapists (OTs) lack the information and resources that could be used to support their clients in understanding if an assistance animal could benefit them and whether it could be considered a reasonable and necessary support in their NDIS plan.⁵ Given that OTs are often a key figure in a care team guiding and supporting the process and acting as the Assistive Technology Assessor as per the NDIS assessment template⁶, this is a significant barrier to accessing this support.

The second pathway to NDIA funding is applying for Maintenance Funding once participants have an assistance animal who has been accredited and meets the requirements set out in the assessment template. This funding is available for expenses that contribute to the upkeep of an assistance animal, such as food, veterinary services, grooming and medication.

CYDA welcomes the access to assistance animals for children and young people with disability that the NDIA is providing. However, we are concerned that the rules and definitions in the current NDIA Assistance Animal Guidelines⁷ and the processes for applying create significant barriers to accessing this support. Another potential barrier of the second pathway would be the risk of maintenance funding being re-assessed, administrative burden to apply and the upfront costs involved in obtaining an assistance animal before maintenance funding is approved.

The Guidelines state that an assistance animal can be categorised as an NDIS support, and therefore be included in a person's plan, if it meets certain accreditation standards.⁸ They also state that the proposed support (in this case an assistance animal) must meet the NDIS funding criteria of reasonable and necessary supports.⁹

However, the Guidelines then restrict the funding of assistance animals according to three categories, by stating:

“The types of assistance animals we fund are:

⁵ Long, K.K., et.al., 2022. Australian occupational therapists' knowledge of the purpose, scope, and funding of assistance dogs. *Australian Occupational Therapy*, Vol.69, pp-64-76

⁶ NDIS, 2025. [Assistive Technology Templates](#)

⁷ NDIS, 2025. [Assistance animals operational guideline](#)

⁸ NDIS Guidelines P.2: Accredited through State or Territory law, an animal training organisation prescribed by the Disability Discrimination Act (Cth), a registered NDIS assistance animal provider (s73E NDIS Act) **or** trained to alleviate effects of disability and meet hygiene and behaviour standards in public.

⁹ NDIS Act, Section 34, [Reasonable and Necessary Supports](#)

- *dog guides*
- *physical assistance animals*
- *assistance animals for some participants who have been diagnosed with Post Traumatic Stress Disorder (PTSD), who are able to take on the ongoing responsibilities of a primary handler.”*

Confusion arises because it is possible that an assistance animal could meet the definition of an NDIS support and meet the reasonable and necessary criteria according to the Act but not fit into one of the three categories listed in the Guidelines listed as “the types of assistance animals we fund”.

One of the focus group participants addressed the difficulties of applying for NDIS funding, saying,

“My son’s assistance dog is about to be certified under the Guide, Hearing and Assistant Dog Act (Qld) and meets the reasonable and necessary criteria under the NDIS Act, but because his primary diagnosis is Autism there is a question around whether they will fund the maintenance costs of the dog. The Guideline document is confusing and contradictory”. Parent/caregiver of child or young person with disability, focus group May 2025.

To be funded by the NDIA, assistance animals must also be trained to actively perform three measurable tasks that reduce the functional impact of the participant’s disability. This is in line with the standard for Assistance Dogs International¹⁰ but not the current standards across states and territories which state one or more tasks is necessary.

Participants in our focus group agreed that NDIA processes act as a barrier to obtaining and maintaining an assistance animal.

“We have not touched NDIS stuff yet because ... my daughter has two disabilities and NDIS only recognises one of them. And they will only add an assistance animal if its tasks relate to that one disability. So we have to go a round-about way of getting the second disability recognised and it's just, it's very complicated”. Parent/caregiver of child or young person with disability, focus group May 2025.

“I've had maintenance funding for a few years, but just recently when my plan changed with NDIS, they've taken that off because I think a lot of

¹⁰ Assistance Dogs International. [Summary of Standards](#)

the changes with the NDIS now they're making it quite hard". Young person with disability, focus group May 2025.

"The Local Area Coordinator for NDIS ... basically said no". Parent/caregiver of child or young person with disability, focus group May 2025.

Children and young people with disability and their families can escalate their request for assistance animal funding through NDIA or the Administrative Review Tribunal (ART), but the inordinate amount of time and resources used by this process is an unfair barrier to support.

In February 2025, ART found in favour of an NDIS participant with a primary disability of autism who self-trained their dog and met accreditation standards through the DDA. The participant first applied for maintenance funding in March 2022.¹¹ The Tribunal outcome recognises the definition and requirements of the NDIS Act, but effectively bypasses the Guideline document's list of three types of animals they fund which places exclusions on self-trainers and certain disabilities.

CYDA recommends a process of review that sees the NDIA policy and guidelines documents becoming aligned with both the NDIS Act and the Assistance Animal Principles. This would create pathways for fairer access and prevent unnecessary use of resources when participants go to ART for an outcome.

Other forms of access/funding

Government organisations that can supply a fully trained and certified assistance dog include Department of Veteran's Affairs, road and traffic commissions and victim of crime programs in states and territories (for example the Traffic Accident Commission in Victoria).

The Department of Veterans' Affairs has a clear process for applying for an assistance dog and have contracts with multiple training organisations to supply fully trained and accredited assistance dogs to applicants with PTSD.

In addition to these government avenues, there are a number of organisations, large and small, around Australia who can provide assistance animals to applicants or assist them with training. The following list are just a few examples:

- Guide Dogs Australia, provide fully trained assistance dogs to people with low vision or blindness.

¹¹ ART, 2025. [DRVV and National Disability Insurance Agency \(NDIS\) \[2025\] ARTA 158 \(26 February 2025\)](#)

- Assistance Dogs Australia, provide fully trained assistance dogs but applications are closed due to high demand
- Australian Lions hearing and medical alert assistance dogs, provide fully trained assistance dogs.
- Mind Dog, provide support to people with psychosocial disability self-train and then administer the PAT
- Paws For Assistance Dog Training, provide support for people with a range of disabilities to self-train and then administer the PAT.

b. Fund a public education campaign to raise awareness of benefits and rights for assistance animals and their handlers

Evidence in the literature and from CYDA's consultation highlights significant misunderstanding about the function and rules around assistance animals accessing public places in Australia and providing disability related tasks. A public education campaign is an important part of implementing the National Assistance Animals Principles.

Benefits

CYDA recommends one focus of a public education campaign should be on the benefits of assistance animals in the context of the national principles. This should be targeted at the general public and include information about how people should behave and respond around assistance animals.

An NDIA commissioned report in 2016¹² found that the literature at the time could not conclusively attest to the general benefits or value for money of assistance animals for people with disability. However, the available literature and their consultation with people with lived experience suggested a range of potential benefits to funding assistance animals for NDIS participants. The report also recommended a national oversight body to prevent larger assistance animal organisations monopolising accreditation standards and processes. It also recommends a public education campaign be run at the level of local councils to prevent discrimination against assistance animal users.

Research emerging since this report has increased the evidence base for the benefits of assistance animals. In a small qualitative study, Agnew et al (2024)¹³ interviewed six

¹² La Trobe University, 2016. [Reviewing Assistance Animal Effectiveness](#)

¹³ Agnew, Z, et al. 2024, 'Having the dog as part of the family gives us hope': Experiences of the impact of assistance dogs on the occupational engagement of children with autism and their families. Vol71. pp18-34

caregivers whose autistic children had assistance dogs. Comparative benefits for all families included reduced social isolation, increased family functionality, and higher levels of independence, participation in everyday routines and engagement in therapeutic supports.

A paper by Tsang et. al. (2023)¹⁴ analyses the results of 112 people with disability from around Australia who have had an assistance animal for at least three months. As well providing benefits related to disability support, including guiding, altering to sounds, seizures, diabetes and allergies, response to psychiatric experiences, and performing mobility tasks, these animals also fulfilled important roles in public. When considering the interface between the public and the assistance animal-handler team, the researchers found two key areas of concern that could be remedied through increased public education to prevent negative or discriminatory reactions in public. First, general awareness of the rights of assistance animals and their handlers and second, how to act appropriately around an assistance animal and their handler in public.

“A majority (92%) agreed or strongly agreed there is a need to help with community perceptions of appropriate levels of access for assistance animals, the do’s and don’ts when encountering an assistance animal, as well as resources to help businesses and service providers understand what questions they are legally permitted to ask an assistance animal user”.

Participants in our focus group also demonstrated concerns with public interactions.

“People are generally pretty good but every now and then we get someone just reaching out and patting my son’s assistance dog. Even though his jacket has a sign saying ‘Stop. Do not pat’, some people just don’t notice.” Parent of child or young person, focus group May 2025.

Although not in the context of assistance animals specifically, Bould et. al. (2018)¹⁵ analysed the additional social interaction possible for people with intellectual disability when they are in the community alongside a dog and handler, compared to just with the handler. Results demonstrated significantly more encounters between people with intellectual disability and strangers when a dog was present. In particular, the researchers found the presence of the dog prevented exclusionary encounters and

¹⁴ Tsang et al 2023. ‘Community members aren’t aware that assistance animals come in all shapes and sizes, and help people with all kinds of disabilities’ – Experiences of using assistance animals within community living in Australia. Disability and Rehabilitation: Assistive Technology, Vol.18, No6. P.948

¹⁵ Bould et.al. 2018. ‘More people talk to you when you have a dog’ – dogs as catalysts for social inclusion of people with intellectual disabilities. Journal of Intellectual Disability Research, Vol 62, part 10, pp 833–84.1

increased acknowledgement and recognition of people with disability in their community. Given the social exclusion this group experiences on the whole, the results of this study are important when considering the potential benefits of assistance animals across a variety of user groups and these principles can ensure equity of access.

Rights

As well as covering the benefits and etiquette of interacting with assistance animals in public, a public education campaign should also raise awareness about the rights of assistance animals and their handlers in the context of the national principles. The target audience for understanding the legislative and policy framework that supports assistance animals should be the public service, corporate and small business sectors. The onus should be on ensuring the information is understood and appropriately enacted by those whose job it might be to question the presence of assistance animals in public places.

Our focus group shared experiences of access issues in public, including the following.

“I had someone at Centrelink the other day raise their voice from the front desk across Centrelink to tell me ‘no dogs allowed’, and the dog is clearly in a jacket and is very obviously an assistance dog”. Parent of child or young person, focus group May 2025.

“I’m an ambulatory wheelchair user, and so sometimes I’m walking and sometimes I’m in a wheelchair. And it’s funny because when I’m in my wheelchair, people don’t stop me as much. I just think that shows the misconceptions around assistance animals.” Young person with disability, focus group May 2025.

Negative encounters in the community can have a detrimental impact on the wellbeing of children and young people with disability. Therefore, it is critical that their access rights are recognised and respected when in public places with their assistance animals.

c. Provide clarity on the definition of Assistance Animals

The department administering the national framework should provide a clear definition of assistance animals.

Currently there is no nationally agreed-upon definition of Assistance Animals. Our focus group and trainer interviews found that confusion in the community about the various terms used, makes it challenging for people to understand their rights in public.

Participants noted confusion between assistance animals, therapy animals, emotional support animals, medical alert or medical assistance dogs and guide dogs.

“There's so many different assistant animals, so someone who is new to it would be like, ‘okay so this dog is accredited’, but how are we defining that?” Parent/caregiver of child or young person, focus group, May 2025.

There was also a strong sentiment that although the term ‘animals’ is in the DDA 1992 and other state/territory legislation, it is difficult to see how any animal other than a dog would be suitable for accredited public access and assistance tasking.

“There's a lot of different classifications of animals. Emotional support animals don't actually exist here. It's an American thing, and I don't know if anybody's read any of the stories, but emotional support animals have gotten a little insane over there. So there's people with emotional support alligators, emotional support mini horses. And because of the legislation, they're supposed to be reasonable accommodations for them, but I'm assuming the alligator didn't get training.” Parent/caregiver of child or young person, focus group, May 2025.

“I love the whole, ‘let's embrace all of the animals’, but let's be honest about the role of the canine and the history of the canine and why they are so good at what they do.” Dog trainer 2, interview May 2025.

Clarifying definitions will work alongside other reforms to enable more equitable access to and use of assistance animals for children and young people with disability.

Before moving on to part 2, CYDA would like to share two images of assistance animals at work. These have been shared with permission of the children and their caregivers who participated in our focus group.



Image id: A child laying with their back on pink and black, floral-patterned carpet. A medium sized, beige colour dog lays on top of the child with its face resting on their shoulder. The dog is wearing an aqua colour jacket with a yellow and black 'L' indicating it is a learner assistance animal.



Image id: A child, with their back to the camera, wearing a black shirt and pink glove in a wheelchair is leaning over to their left side to pat a small brown dog. The dog is attached to the wheelchair with a red lead and is wearing a blue assistance jacket and looking up at the child.



Part 2: Recommendations based on draft principles

CYDA broadly supports the six draft Principles and makes the following recommendations based on each principle

Recommendation 2: Strengthen each National Principle through co-designed, consistent, and accessible implementation

- a. Principle 1: National accreditation for trainers and organisations
 - Commission a co-designed review, led by people with lived experience as handlers and trainers, to assess the suitability of the Certificate IV in Animal Behaviour and Training – Assistance Animal stream as the national standard.
 - Ensure the qualification is accessible through TAFE at low or no cost, with transition supports including recognition of prior learning for existing trainers.
- b. Principle 2: Minimum training standards for assistance animals
 - Undertake additional consultation to clarify and define appropriate training methods, tasking expectations, and ethical approaches that prioritise both animal welfare and the needs of people with disability.
 - Ensure these standards are informed by lived experience and are flexible enough to accommodate different disability support needs and animal types.
- c. Principle 3: Single national Public Access Test (PAT)
 - Develop a fit-for-purpose national PAT through a co-design process involving assistance animal users, trainers, disability representative organisations, and animal behaviour experts.
 - Ensure the PAT is nationally consistent, accessible and culturally safe, with clear guidance for assessors and handlers.
- d. Principle 4: Evidence of disability and need
 - Co-design evidence requirements with people with disability, trainers, and disability representative organisations to ensure the process is consistent, rights-based, and easy to understand.
 - Establish a safe, independent complaints mechanism for people who are inappropriately or repeatedly asked to provide evidence in public settings.
- e. Principle 5: National identity card and logo
 - Ensure the card and logo are government-issued, easily recognised, and supported by a streamlined, cost-free transition process.
 - Extend the card's validity period to reduce administrative burden and avoid unnecessary re-application.
- f. Principle 6: Animal welfare
 - Adopt the Five Domains model as the national benchmark for welfare standards.
 - Co-design implementation to reflect both animal welfare and the access needs of people with disability.

Principle 1: Nationally consistent accreditation requirements for assistance animal trainers and/or training organisations

“Accreditation requirements should recognise the complexity of assistance animal training and that's what's not there currently and because it's unregulated.” Trainer 2, May 2025.

CYDA recommends the broad adoption of the new Certificate IV in Animal Behaviour and Training- assistance animal stream be adopted as the national accreditation requirement for assistance animal trainers and organisations.

Currently in Australia, there are no accreditation requirements for assistance animal trainers and until recently there were no training programs with content focused on assistance animal training. In consultation with stakeholders, the training industry organisation Skills Impact developed five units of competency on assistance animal training to include as a stream in the commonly undertaken Certificate IV in Animal Behaviour and Training.¹⁶ This stream is now available to complete through a limited number of training organisations around Australia.

Both trainers we interviewed for this submission agreed that this stream of the Certificate IV would likely be adopted as the national accreditation requirement for assistance animal trainers. CYDA broadly supports this approach, however given no stakeholders from the disability community were included in the initial consultation, we recommend the assistance animal training stream be reviewed by people with disability and their caregivers before implementation. Not doing so would risk this stream not being fit-for-purpose for the very people it is intended to support.

One trainer pointed out:

“There’s a lot of people calling themselves assistance dog trainers who don’t have any disability background”.

“I definitely think it would be a good thing to have that opportunity for clients to access more trainers that have the background and the knowledge to accept them and put them through a process of getting to a certain standard”. Trainer 1, interview May 2025.

¹⁶ Skills Impact, 2025. [Trainers of assistance dogs project](#)

Another trainer, who also has an assistance dog trained to support her own disability, captured the importance of trainer education standards:

“What I learned on the other side of being an assistance dog handler was that [trainers] don't know anything about disability. They don't understand how my disability impacts my capacity, my ability to string words together, various things. I thought I'm going to be the trainer that understands disability”. Trainer 2, interview May 2025.

In addition, this trainer suggested the standard should include a component about advocacy services as being part of an assistance animal trainer or organisation's job.

“That's one of the things trainers won't do now is they don't advocate for their handlers and they must. It must be part of the standard that if I'm an assistance dog trainer, I'm there for my handlers.” Trainer 2, interview May 2025

Finally, CYDA agrees with the suggestion by one of the trainers, to ensure this course is available at no or low cost to people as a means to grow the industry and meet the demand for assistance animals.

“If we're going to keep free TAFE then we need free TAFE for trainers or very greatly reduced train TAFE for trainers of assistance dogs.” Trainer 2, interview May 2025.

Trainers were also interested in how their current education would be recognised under the new system and whether they could seek recognition of prior learning to help them meet new standards.

CYDA would like to see the concerns of trainers addressed through further consultation that leads to certainty for the industry which would ultimately benefit children and young people with disability as assistance animal handlers.

Principle 2: Minimum assistance animal training standards

CYDA supports this principle and **recommends further consultation be done with trainers and the disability community to clarify acceptable training practices within the standard and more clearly define tasking practices.**

The current piecemeal approach to training standards for assistance animals means that animals accessing public places have been trained according to a variety of methods and standards and handlers do not always have complete confidence in their animals in public.

Both children and young people with disability and their families as well as trainers identified feeling safe in the community as a key component of implementing a minimum animal training standard.

For instance, one young person explained,

“Having a standard where you know that if you're going to interact with another dog in public, they're not going to attack your dog”. Young person, focus group May 2025.

And a trainer said,

“Being out in public knowing all dogs are of the same standard would do so much to alleviate the concerns ...about other dogs. ‘I hope that dog's not going to lunge and bark.” Trainer 2, interview May 2025

Another point raised by children and young people with disability and their families was the potential for clear training standards having the potential to provide clarity for trainers to provide industry growth to meet the demand from people with disability. The demand for assistance animals well outstrips the supply¹⁷.

“Lots of application lists are closed to even get a fully trained assistance dog...Principle two would really be beneficial because it standardises the training and provides clarity for people about what's actually required and what's actually associated.” Young person, focus group May 2025.

Key concerns for trainers were around which training methods and philosophies would be part of this standard and which would not and how this would shape their practices. There was concern around lack of clarity of terms such as ‘force free’ training which methods and equipment were permissible if this philosophy was embraced.

“Everyone is going down the force free road, which is good. But because I use a nose harness, another trainer thinks I’m a forceful trainer, so it’s things like that where they say ‘we’re not going to approve you’... I do use nose harnesses for the safety of the handler on a particularly pullly dog”. Trainer 1, interview May 2025.

“How much work is enough work? And when I talk to people as I come across them and I say, well, ‘how often does your dog work’? ‘It goes everywhere with me’ ... And you realise that they haven't even began to

¹⁷ Assistance dogs international, 2023. Press release: [‘Critical’ volunteer shortage threatens supply of life-changing assistance dogs](#)

understand. Force free vigilantes, I call them ... That's all well and good, but what about if the dog is working six days a week? It might be called forced free, but is it really?" Trainer 2, interview May 2025.

There was discussion around tasking and the confusion around how to define a task and how many tasks animals should be required to have. In the absence of industry standard definitions, one trainer defines tasks as follows:

"It has to be a trained behaviour... The task should be measurable, it should be able to be performed in any location, the task should be able to be repeated and be very clear to the dog of what it is being asked to do". Trainer 1, interview May 2025.

And she added,

"Tasks are good at eliminating dogs that probably aren't appropriate. I think you have to have something that defines an assistance dog, more than a well-behaved pet dog".

The other trainer we interviewed suggested,

"Right now, every dog on this planet will do a minimum of three tasks, naturally without you even realising they're doing it. They will [block, interrupt and provide deep pressure in response to distress in the person]. We don't have to train those things. Dogs can tell cause they can smell when the cortisol and adrenaline and noradrenaline increase" Trainer 2, interview May 2025.

Both trainers agreed that NDIS definitions were shaping the industry and the way assistance dogs were being trained.

"Anyone working within the NDIS framework and you're looking to get NDIS funding, make sure you have at least three, even a fourth task, under your belt". Trainer 1, interview May 2025.

CYDA would like to see a process that creates more evidence around tasking (especially regarding the science of co-regulation) in order to broaden the definition of 'task'. It is crucial that the physiological processes that occur during co-regulation are recognised and accounted for in the training process.

Principle 3: A single national Public Access Test (PAT)

CYDA supports this principle and **recommends a co-design process to establish the most fit-for-purpose PAT**. Our community would benefit from a PAT that has flexibility for disability access needs and our consultation indicates that animal welfare standards should be more robustly represented in the PAT.

There are currently only two legislated public access tests in Australia. Queensland uses a test under the umbrella of the *Guide Hearing and Assistance Dog Act 2009* (GHAD) and the Australian Capital Territory uses the *Domestic Animals Act 2000*. Trainers in other states/territories generally adopt one of these or the Assistance Dogs International PAT in order to train and test to a standard they are not necessarily legally obliged to, but that they feel confident with.

One trainer we spoke to uses Queensland's GHAD standard and test despite only working in Victoria:

“Because it was the original standard for the public access test and it’s something that is recognised more throughout Australia...GHAD holds a higher standard of accreditation for trainers. We are audited every three years through the Queensland Government....It means we’re being held accountable as well with the way we work and we have a framework to work under and a legislation to uphold”. Trainer 1, interview May 2025.

But people with disability not in Queensland or the ACT are required to be able to prove that their dog meets the access standards set out in the Disability Discrimination Act 1992. They can do this with evidence of passing PAT in another state or territory, through some form of identity card provided by a training organisation, or via a process arising from a formal challenge to their rights in which they can provide medical and training records. They have to rely on the professionalism of their trainer or provider organisation to train to a standard that they feel confident in when accessing their community. This is particularly pertinent for children and young people with disability who might lack understanding of this disjointed system and therefore the confidence to know they are protected under the DDA.

The perspective of young person with disability living in Queensland demonstrates the differences in feelings of confidence between assistance animal users across jurisdictions.

“With my dog having GHAD certification, I feel like I've been pretty lucky because I feel like I'm very protected. Like if something happens and I get denied access, I can literally show them my government ID card that says that they can get fined like \$20,000 if they don't allow me into a

public place. Doesn't mean people still don't deny you access". Young person with disability, focus group May 2025.

And while we agree it is critical to provide certainty to the training industry and people with disability through a single national Public Access Test, CYDA also advocates for a flexible approach that does not disadvantage people because their disability access needs are not accounted for in the process.

One trainer summed up her flexibility in training for PAT:

"So if I've got somebody who has a intellectual disability but they're quite capable in terms of caring for their dog, even if their speech is impaired or they've got an acquired brain injury, they can maybe manage absolutely everything, but maybe not as great on Tuesday as they would have on Thursday." Trainer 2, interview May 2025.

Addressing this and similar biases through co-design will ensure children and young people with disability who can benefit from assistance animals, can more easily access one.

Principle 4: Evidence of disability and need for an assistance animal

CYDA supports this principle and **recommends the process around provision of evidence be codesigned with trainers and the disability community**. It should then be implemented alongside public education and a complaints process.

"Some people are very inconsiderate and downright rude when they ask if your dog is a regular dog or an assistance dog. So I think the national identity card and logo is a great idea and it needs to come with a lot of funding for community education so that security guards everywhere as well as other employees of organisations, including public servants, know that you have a right to be in that space." Parent/caregiver of child or young person, focus group May 2025.

While CYDA appreciates the need to be able to confirm that an assistance animal has the right to be in a public place, we recommend the details around this principle be carefully considered and the design of the process as well as any communications around the process be co-designed with input from the disability community.

The National Principles provide an opportunity to standardise the requirements to produce evidence. Alongside the establishment of a national identity card and logo, a targeted campaign outlined in recommendation 1.a. of this submission can guide the public and businesses on the rights and responsibilities of assistance animals and their handlers. Details around the way people are approached and asked, who in an

organisation or public place is allowed to ask for evidence and what evidence they can ask for needs to be made clear during a public education campaign.

Focus group participants were clear that evidence of disability is provided to the trainer or provider organisation and they should not need to provide this for spot checks in public. CYDA acknowledges that this becomes more complex if the animal is self-trained under the rules of the DDA.

“I don't think we should be providing that information to anyone except for the initial trainer when or in the initial submission of training”.

Parent/caregiver of child or young person, focus group May 2025.

One of the trainers we interviewed supported this view, saying,

“They should not be able to ask for proof of anything because that person has already provided all the proof to have and train the dog.”.

Trainer 1, interview May 2025.

Commenting on the idea of having to prove her right to be in public with her assistance animal, one young person explained,

“I feel like for me that would be so stressful because I already get so much anxiety about being pulled up by security guards and shopping centres”. Young person with disability, focus group May 2025.

A safe and accessible complaints process should also be developed for people with disability to report discriminatory behaviour around this process.

One trainer considered,

“I was thinking about doing a QR code on the dog jacket and then the person scans it and it goes to a website to say these are the regulations”. Trainer 1, interview May 2025.

This could possibly form part of a public education campaign.

Principle 5: National identity card and logo

CYDA supports this principle and **recommends the card be designed so that it is clear it has been issued by a federal government department.** The legitimacy that this will provide is important to the confidence of children and young people with disability when interacting with the public. It is also more likely that this will decrease prolonged or negative interactions with people who are asking to see evidence of their assistance animal status. CYDA also recommends an easy and cost-free process for switching over to the new card so that no assistance animal users are disadvantaged.

A young person in the CYDA focus group who has a government card for her assistance dog, commented on the confidence this brings.

“As someone who has a government ID card currently, I see such a benefit...on the back, it has the little Queensland government logo and it has this whole little spiel about my rights and how they can't deny me access”. Young person, focus group May 2025.

And a parent commented,

“Education and awareness is probably the biggest thing that'll get us anywhere. And if we did have something like an identification card, that's brilliant evidence of disability.” Parent/caregiver of child or young person, focus group May 2025.

A parent of a young person with disability suggested the kind of details that could be useful to include on a national card.

“But I think we just need to be much clearer in the definitions of what things are with that card, which is ‘this is an assistance dog. They perform tasks to help this person with a disability live independently.’ It doesn't need to say exactly what the disability is. It doesn't need to say what the evidence is. It just needs to say this is what an assistance animal is. This is what they do, they are allowed to be here, they are a piece of medical equipment. They just happen to be cute and fluffy.” Parent/caregiver of child or young person, focus group May 2025.

Principle 6: Animal welfare

CYDA supports this principle and **recommends using the Five Domains Model¹⁸ as a national principle to promote consistency for assistance animals across all jurisdictions. We also recommend the details of this principle be codesigned with trainers and the disability community to ensure standards are comprehensive and disability access needs are considered.**

“He changed my life. He helped me so much. But you always have to put them first, no matter how hard that is for you because they're a whole animal themselves.” Young person, focus group May 2025.

¹⁸ Mellor, D., 2016. [Updating Animal Welfare Thinking: Moving beyond the “Five Freedoms” towards “A Life Worth Living”](#)

Each state and territory has legislation and policies for regulating animal welfare and wellbeing resulting in inconsistency across the country. The overarching National Principles Framework could ensure alignment across jurisdictions, providing more clarity for trainers and assistance animal users. Just as CYDA advocates for disability rights, we also advocate for moving towards a rights understanding for animals. As such The Five Domains Model¹⁹ of animal welfare moves beyond the earlier minimum standard five freedoms model to promote positive states rather than avoiding negative ones.

*“The five domains are very helpful because they cover everything”.
Trainer 2, interview May 2025.*

Trainers and focus group participants agreed that a standard based on their inherent value as sentient beings should be used to ensure their wellbeing across the lifespan.

“Assistance dog handlers and trainers need to understand the welfare of the dog, including what it was bred for, where it's at now, it's background, how it performs under certain circumstances. It needs to be about relaxation, so the dogs shouldn't be out five days a week working from 8:00 in the morning till 7:00 at night because I'm out seeing my friends because I've got my dog with me.” Trainer 2, interview May 2025.

A young person with disability also pointed out the importance of understanding the intersection between training and wellbeing for assistance animals.

“It's actually not good for the dog if they haven't had the right training because being in a public space is so stressful for a dog.” Young person, focus group May 2025.

And a trainer also suggested,

“Overtrain the dog where possible so at least the dog has had exposure to as many possible scenarios as we can do”. Trainer 1, interview May 2025.

Another trainer demonstrated how she includes an understanding on welfare in the training she provides her clients,

“I teach a whole lot about the animals nervous systems, so they understand why the animals behaving a certain way and what's

¹⁹ Mellor, D., 2016. [Updating Animal Welfare Thinking: Moving beyond the “Five Freedoms” towards “A Life Worth Living”](#)

triggering it to how we bring it back down.” Trainer 2, interview May 2025.

And finally, focus group participants suggested that people with disability should be supported to meet the needs of their assistance animals.

“People who have assistance animals might need support in making sure those welfare things are met. So for example, when [dog name] was small and she needed multiple walks a day, which I couldn't do, I could handle one walk a day with her, so I had to have a dog walker. Now to anyone else, that might be seen as quite a luxury. In reality, it was something I needed”. Parent/caregiver of young person, focus group May 2025.

Ensuring welfare needs are covered in training programs and discussed with clients at the point of their Public Access Test is an important way to embed animal welfare within the overarching framework.

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