



Joint Statement Calling for People with Disability's Access to Assistance Animals to be Protected

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The above organisations led by the Australian Autism Alliance, release a joint statement calling for critical reform through the establishment of a **National Assistance Animal Framework** to meet the needs of people with disability, and remove inequitable access barriers.

We welcome the [draft National Principles for the Regulation of Assistance Animals](#) released by the **Department of Social Services ('DSS')** for consultation on 7 March 2025. Over **94%** of respondents – to a [2021 consultation conducted by the Department of Social Services \('DSS'\)](#) – called for national consistency in assistance animal regulation in the form of a national Public Access Test ('PAT'), national accreditation requirements & standards, a national identity card, and improved standards regarding assistance animal trainers & assistance animal training organisations.

However, we need to go further and develop an overarching National Assistance Animal Framework that embeds, implements, and actualises the National Principles. This will enable the National Principles to operate together with state/territory policy and practice, thereby enabling a whole-of-government and cross-jurisdictional approach. Furthermore, the disability community – especially those who use assistance animals – must be partners in co-design and implementation.

A National Assistance Animal Framework would also address current gaps in assistance animal policies – such as the assistance animal guidelines of the **National Disability Insurance Scheme** ('NDIS'). Currently, the National Disability Insurance Agency ('NDIA') implements [Operational guidelines and policies](#) that set out the types of assistance animals that the NDIS will fund. These are:

- **Dog guides & hearing assistance animals** — for the blind & D/deaf communities;
- Physical assistance animals — also commonly known as **mobility assistance animals** for people with physical disability; and
- Assistance animals for some participants who have been diagnosed by a psychiatrist with long-term but stable **Post-Traumatic Stress Disorder** ('PTSD').

The Operational Guidelines and their limitation to these three types — thereby excluding **medical alert assistance animals**, such as **epilepsy seizure dogs** for **people with epilepsy** or **hypoglycaemic & hyperglycaemic alert dogs** for **people living with diabetes** — do not reflect the diverse range of assistance animal users. Despite the international evidence for the efficacy of medical alert assistance animals for both diabetes and epilepsy,¹ the NDIA goes as far as to erroneously claim that [“there’s currently very little evidence that epilepsy seizure dogs are an effective and reliable disability support”](#).² This is despite the widespread use of alert /response assistance animals, especially for people living with conditions such as diabetes or epilepsy, across the globe. For many NDIS participants, medical alert assistance animals are a reasonable and necessary support that must be preserved.

The Operational Guidelines also exclude — without adequate justification or explanation — funding for a PTSD assistance animal unless the participant's *only* psychiatric diagnosis is PTSD. The presence of co-occurring conditions is the norm for PTSD, whereby over **78%** of people with PTSD will experience at least one additional lifetime mental health condition — and around **50%** will experience three or more psychological co-occurring conditions.³

Limiting assistance animals, which can significantly improve life outcomes for people with PTSD,⁴ to NDIS participants without co-occurring PTSD would arbitrarily exclude the majority of people with more complex, co-occurring presentations of PTSD — especially people with psychosocial disability and people with complex support needs, for whom assistance animals could be an essential, reasonable and necessary support.

¹ See especially; Adam Kirton et al, 'Seizure response dogs: Evaluation of a formal training program' (2008) 13(3) *Epilepsy & Behavior* 499, 500-504; Luff, Grace et al, 'The role of trained and untrained dogs in the detection and warning of seizures' (2024) 150(January) *Epilepsy & Behavior* 109563. Research illustrates that trained dogs can distinguish epileptic seizures from non-epileptic seizures through Volatile Organic Compound ('VOC') profiling.

² <https://ourguidelines.ndis.gov.au/supports-you-can-access-menu/equipment-and-technology/assistance-animals-including-dog-guides/whats-assistance-animal> & <https://drive.google.com/file/d/1CoZzJaeOeiPKnReROSSOpdrRDJgMqnf8/view?usp=sharing> (29 July 2024)

³ See, eg, Neil P Roberts et al. 'Treatment considerations for PTSD comorbidities' in David Forbes et al (eds), *Effective treatments for PTSD: Practice guidelines from the International Society for Traumatic Stress Studies* (Guilford Press, 3rd ed, 2020) 417, 418–450; Tarik Qassem et al, 'Psychiatric Co-Morbidities in Post-Traumatic Stress Disorder: Detailed Findings from the Adult Psychiatric Morbidity Survey in the English Population' (2021) 92(1) *Psychiatric Quarterly* 321.

⁴ See especially; Kerri Rodriguez et al, 'The effect of a service dog on salivary cortisol awakening response in a military population with posttraumatic stress disorder (PTSD)' (2018) 98 *Psychoneuroendocrinology* 202, 202-210; Sarah Leighton et al, 'Assistance dogs for military veterans with PTSD: A systematic review, meta-analysis, and meta-synthesis' (2022) 17(9) *PLOS One* e0274960.

PTSD often co-occurs with other mental health challenges, with one study noting that this applied to over 75% of people with PTSD⁵. Trauma exposure precipitates PTSD and is more common for people with cognitive difference – including Autistic people and people with Down Syndrome⁶. Therefore, ensuring that Australia implements a nationally consistent approach that includes individuals with co-occurring conditions – to policies, programs, and initiatives, including assistance animals – that can integrate the complexities of the health policy landscape is vital.

For example, the higher rates of PTSD among Autistic people (32%) compared to neurotypical people (4%) – and the lack of trauma-informed supports designed explicitly for people with cognitive impairments, despite the ‘ubiquitous acknowledgement that people with intellectual disability experience greater rates of abuse’ – demonstrate a potential gap in policy and practice that may under-serve Autistic victim-survivors and victim-survivors with intellectual disability.⁷ Due to the compounded barriers for and traumagenic experiences of people with cognitive impairment, providing victim-survivors with evidence-based supports to decrease the impact of PTSD and trauma is important.⁸

Many victim-survivors of sexual assault can view other people as a threat to their safety; the research-backed ability of service dogs to both present as a non-threat and a therapeutic aid offers great utility for people with PTSD.⁹ Indeed, assistance animals critically alleviate the impact of PTSD symptomatology, which are often reported by Autistic victim-survivors and people with intellectual disability.¹⁰ Furthermore, service dogs have been shown to support the psychological health and well-being of children with Down Syndrome in general – regardless of their trauma history.¹¹

⁵ Ibid. See also Nirit Haruvi-Lamdan, et al, ‘Autism Spectrum Disorder and Post-Traumatic Stress Disorder: An unexplored co-occurrence of conditions’ (2020) 24(4) *Autism* 884; Paddy McNally, Laurence Taggart, & Mark Shevlin, ‘Trauma experiences of people with an intellectual disability and their implications: A scoping review’ (2021) 34(4) *Journal of Applied Research in Intellectual Disability* 927; Jacinthe Dion et al, ‘Child maltreatment among children with intellectual disability in the Canadian incidence study’ (2018) 123(2) *American Journal of Intellectual and Developmental Disabilities* 176

⁶ See, eg, Freya Rumball et al, ‘Heightened risk of posttraumatic stress disorder in adults with autism spectrum disorder: The role of cumulative trauma and memory deficits’ (2021) 110 *Research in Developmental Disabilities* 103848; Liesbeth Mevissen & Ad de Jongh, ‘Assessment and Treatment of PTSD in People with Intellectual Disabilities’, in Colin Martin, Victor Preedy, & Vinood Patel (eds), *Comprehensive Guide to Post-Traumatic Stress Disorders* (Springer, 2016) 22; Sarah Wigham & Eric Emerson, ‘Trauma and Life Events in Adults with Intellectual Disability’ (2015) 2(2) *Current Developmental Disorders Reports* 93

⁷ Ibid. See also Nirit Haruvi-Lamdan, et al, ‘Autism Spectrum Disorder and Post-Traumatic Stress Disorder: An unexplored co-occurrence of conditions’ (2020) 24(4) *Autism* 884; Paddy McNally, Laurence Taggart, & Mark Shevlin, ‘Trauma experiences of people with an intellectual disability and their implications: A scoping review’ (2021) 34(4) *Journal of Applied Research in Intellectual Disability* 927; Jacinthe Dion et al, ‘Child maltreatment among children with intellectual disability in the Canadian incidence study’ (2018) 123(2) *American Journal of Intellectual and Developmental Disabilities* 176.

⁸ Ibid.

⁹ See, eg, Simone Swartzentuber Emmons, ‘Animal-assisted therapy for posttraumatic stress disorder in sexual trauma survivors’, in Eric Altschuler (ed), *Animal Assisted Therapy Use Application by Condition* (Elsevier, 2022) 97; Sarah Leighton, Leanne Nieforth, & Marguerite O’Haire, ‘Assistance dogs for military veterans with PTSD: A systematic review, meta-analysis, and meta-synthesis’ (2022) 17(9) *PLoS One* e0274960; Janice Lloyd, Laura Johnston, & Julia Lewis, ‘Psychiatric Assistance Dog Use for People Living With Mental Health Disorders.’ (2019) 6 *Frontiers in Veterinary Science* 166.

¹⁰ Ibid. See also, eg, Robert Viau et al, ‘Effect of service dogs on salivary cortisol secretion in autistic children’ (2010) 35(8) *Psychoneuroendocrinology* 1187; Sarah Maber-Aleksandrowicz, Cerian Avent, & Angela Hassiotis, ‘A Systematic Review of Animal-Assisted Therapy on Psychosocial Outcomes in People with Intellectual Disability’ (2016) 49-50 *Research in Developmental Disabilities* 322; Terry Crowe et al, ‘Effects of partnerships between adolescents with developmental disabilities and service dogs’ (2019) 7(1) *The Open Journal of Occupational Therapy* 1.

¹¹ See, eg, Mary Renck Jalongo & Lori Breece, ‘Mitigating Physical and Psychological Disabilities: Service Dogs for Children’, in Mary Renck Jalongo (ed), *Children, Dogs and Education* (Springer Link 2018) 229.

However, people with cognitive impairment— especially those who are victim-survivors – face barriers in accessing the appropriate trauma supports, such as assistance animals & animal-assisted therapy,¹² which would enhance their overall wellbeing and their social integration with society.¹³

Indeed, assistance animals are seldom dispensed to people with cognitive impairment, despite the evidentiary base for their support in assisting people with lived experience of trauma.¹⁴

Furthermore, the NDIA, through its Operational Guidelines, currently limits NDIS funding to strictly assistance animals that have passed a Public Access Test ('PAT'), which it defines as an independent assessment — by an accredited, independent assessor — that certifies whether the assistance animal can safely go into public places and on public transport. However, Australia lacks a nationally consistent approach to the regulation and accreditation of assistance animals, despite calls for a national PAT or national accreditation standards for a number of years.

Moreover, four states and territories (**NSW, Victoria, NT, and Tasmania**) do not have a formal and legislated system that provides accreditation and training of assistance animals. NDIS participants from these states & territories, therefore, face increased barriers to accessing a PAT to accredit an assistance animal to the NDIA's requirements. Assistance animal users already report significant barriers to accessing appropriate NDIS supports, which are further worsened in the absence of a National PAT and nationally consistent policies.

[NDIA research that erroneously conflates assistance animals with pets](#), when accompanied by [comments](#) of “*rul[ing] out... non-assistance animals*” as a type of service & goods through the current NDIS legislation, can sound a dog whistle against people living with invisible disability, many of whom have experienced disability discrimination for having an assistance animal in a public space.¹⁵ Co-designing a national assistance animal policy, rather than consultation at the end of the process, would be a positive step to address these issues of inconsistent access & poor user-experience.

¹² See, eg, Brenna Maddox et al, 'Mental Health Services for Autistic Individuals Across the Lifespan: Recent Advances and Current Gaps' (2021) 23(10) *Current Psychiatry Reports* 66; Cos Michael, 'Is Being Othered a Co-Occurring Condition of Autism?' (2021) 3(2) *Autism in Adulthood* 118; Vanessa Vogan et al, 'Tracking health care service use and the experiences of adults with autism spectrum disorder without intellectual disability: A longitudinal study of service rates, barriers and satisfaction' (2017) 10(2) *Disability and Health Journal* 264.

¹³ See, eg, Simone Swartzentuber Emmons, 'Animal-assisted therapy for posttraumatic stress disorder in sexual trauma survivors', in Eric Altschuler (ed), *Animal Assisted Therapy Use Application by Condition* (Elsevier, 2022) 97; Sarah Leighton, Leanne Nieforth, & Marguerite O'Haire, 'Assistance dogs for military veterans with PTSD: A systematic review, meta-analysis, and meta-synthesis' (2022) 17(9) *PLoS One* e0274960; Janice Lloyd, Laura Johnston, & Julia Lewis, 'Psychiatric Assistance Dog Use for People Living With Mental Health Disorders.' (2019) 6 *Frontiers in Veterinary Science* 166; Robert Viau et al, 'Effect of service dogs on salivary cortisol secretion in autistic children' (2010) 35(8) *Psychoneuroendocrinology* 1187; Kerri Rodriguez et al, 'The effect of a service dog on salivary cortisol awakening response in a military population with posttraumatic stress disorder (PTSD)' (2018) 98 *Psychoneuroendocrinology* 202.

¹⁴ See, eg, Nirit Haruvi-Lamdan, et al, 'Autism Spectrum Disorder and Post-Traumatic Stress Disorder: An unexplored co-occurrence of conditions' (2020) 24(4) *Autism* 884; Sarah Leighton, Leanne Nieforth, & Marguerite O'Haire, 'Assistance dogs for military veterans with PTSD: A systematic review, meta-analysis, and meta-synthesis' (2022) 17(9) *PLoS One* e0274960; Janice Lloyd, Laura Johnston, & Julia Lewis, 'Psychiatric Assistance Dog Use for People Living With Mental Health Disorders.' (2019) 6 *Frontiers in Veterinary Science* 166; Nirit Haruvi-Lamdan, et al, 'PTSD and autism spectrum disorder: Co-morbidity, gaps in research, and potential shared mechanisms' (2018) 10(3) *Psychological Trauma: Theory, Research, Practice, and Policy* 290; Australian Autism Alliance, Submission No 45 to Joint Standing Committee on Implementation of the National Redress Scheme, Parliament of Australia, *Inquiry into the Operation of the National Redress Scheme* (September 2024) 20-21; Simone Swartzentuber Emmons, 'Animal-assisted therapy for posttraumatic stress disorder in sexual trauma survivors', in Eric Altschuler (ed), *Animal Assisted Therapy Use Application by Condition* (Elsevier, 2022) 97

¹⁵ See Man Chi Coco Tsang et al, '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' (2023) 18(6) *Disability and Rehabilitation: Assistive Technology* 942. 90% of participants agreed that more public education was needed regarding assistance animals and public access rights.

Very significantly, national inconsistency in assistance animal policies of states & territories is contributing to interstate inconsistency for victim-survivors of family, domestic and sexual violence ('FDSV') hindering access to emergency accommodation, shelter and respite with assistance animals by their side, increasing risk for further perpetuations of domestic violence and animal abuse.¹⁶

Ensuring that victim-survivors with disability have the appropriate support to leave with their assistance animals is critical, as victim-survivors report delaying leaving, staying with, and even returning to perpetrators due to fears for the safety of animals left behind with perpetrators.¹⁷

A lack of a nationally consistent approach between states and territories is a significant inhibitor to preventing FDSV and homicide in general.¹⁸ Therefore, national harmonisation of state & territory assistance animal policies by co-designing a National Assistance Animal Framework — especially with victim-survivors who use assistance animals — remains an urgent priority to unify assistance animal policies (including accreditation processes), which would, in turn, enable mobility and access to safety.

Call to action:

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.

We look forward to working with you.

[END]

Organisational Endorsements:

- Australian Autism Alliance
- Children and Young People with Disability Australia
- Community Mental Health Australia
- Disability Advocacy Network Australia
- Down Syndrome Australia
- First Peoples Disability Network (Australia)
- Inclusion Australia
- Justice and Equity Centre
- National Mental Health Consumer Alliance
- People with Disability Australia
- Physical Disability Australia
- Women with Disability Australia

¹⁶ See, eg, Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Royal Commission told that people with disability experience high rates of violence and abuse at home* (Web Page, 8 March 2022)

<<https://disability.royalcommission.gov.au/news-and-media/media-releases/royal-commission-told-people-disability-experience-high-rates-violence-and-abuse-home>>; Elena Campbell et al, Department of the Prime Minister and Cabinet, *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence* (23 August 2024), p 59; Anne Volant et al, 'The Relationship Between Domestic Violence and Animal Abuse: An Australian Study' (2008) 23(9) *Journal of Interpersonal Violence* 1277; Daniel Mota-Rojas et al, 'Animal Abuse as an Indicator of Domestic Violence: One Health, One Welfare Approach' (2022) 12(8) *Animals* 977.

¹⁷ See generally Kylie Butler and Jasmine MacDonald, Australian Institute of Family Studies, *Violence against family animals in the context of intimate partner violence* (April 2024).

¹⁸ Ibid. See also Elena Campbell et al, Department of the Prime Minister and Cabinet, *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence* (23 August 2024), p 59; Betty Jo Barrett, 'Domestic Violence, Companion Animal Abuse, and Help-Seeking: The Mediating Role of Fear of Lethal Violence' (2022) 32(5) *Women & Criminal Justice* 467; Maya Gupta & Shelby McDonald, 'Co-Occurrence of Animal Abuse and Intimate Partner Violence', in Aubrey Fine et al (eds), *The Routledge International Handbook of Human-Animal Interactions and Anthrozoology* (Routledge, 2023).