

**From:** David Horne [REDACTED] [REDACTED]  
**Sent:** Tuesday, 12 September 2017 12:13 PM  
**To:** Policy AGD <Policy.AGD@nt.gov.au>  
**Cc:** [REDACTED]  
**Subject:** Modernisation of the Anti-Discrimination Act

Dear Ms Witham,

Thank you including our organisation in your review process of the upcoming proposed changes to the Anti-Discrimination Act.

As Lions Hearing Dogs primarily deals with hearing assistance dogs I will keep my comments focused on Question 9 "Should the Act be broadened to include specifically trained assistance animals such as therapeutic and psychiatric seizure alert animals".

Overall we are in favour of increasing protections for people with disabilities who rely on the assistance of professionally trained dogs.

Through our experiences with being involved in similar processes there are several points which need to be carefully considered.

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The first of these is the term 'animal', we would strongly advise abandoning this term in favour of dog or canine. The reasoning behind this is by using the term animal you are opening up the option for people to use any type of animal as an assistance aid. This is a very large issue currently in the US where many animals are used such as lizards, birds and horses and are protected due to the use of the term animal. Through the process of amending the South Australian legislation in the Dog and Cat Management Act the term dog was purposely used instead of animal to avoid these issues.

Secondly is the term 'appropriately trained'. One of the issues here in South Australia is that any person with a disability can take a dog into a public place in the act of training it to be of assistance. Technically, this means that a dog can forever be in training and still have access rights. It is important to make sure that dogs who are in these situations are of a sufficient level of training in the first place. There may need to be some distinction as to what level of training, or indeed accreditation of the dog, is needed to come under the provisions.

Finally, we would recommend carefully considering the uses for which dogs can be used as assistance dogs. There is a push for companion dogs to have the same rights as assistance dogs and we believe this needs to be clearly defined to avoid confusion and to protect the rights and recognition of dogs who currently, and in the future, provide service as professionally trained assistance dogs by recognised and internationally accredited organisations. It is important that the dogs are performing acts that aid in a individuals disability, and not just there as company for the person.

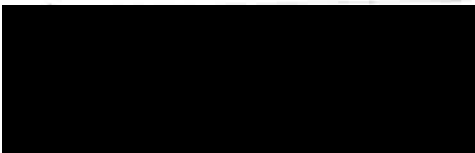
Again, I thank you for our inclusion in the process. If there is anything further we can do to assist, please contact me directly.

Yours in service,

David Horne  
Chief Executive Officer  
Lions Hearing Dogs Inc.



**Australian  
Lions Hearing Dogs**



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