

30 May 2025

The Proper Officer
Advocacy and Inclusion Programs Branch
Department of Social Services
By email: sector.engagement@dss.gov.au

Dear Madam/Sir,

Consultation Paper on the National Principles for the Regulation of Assistance Animals

Kingsford Legal Centre welcomes the opportunity to provide feedback on the National Principles for the Regulation of Assistance Animals (**Consultation Paper**). We consent to this feedback being published.

Throughout this submission, client names and identifying information have been changed to protect confidentiality.

About Kingsford Legal Centre

Kingsford Legal Centre (**KLC**) is a community legal centre, providing free legal advice, casework and community legal education to people in south-east Sydney since 1981. As well as our generalist legal service, we run a state-wide Sexual Harassment & Discrimination Legal Clinic and a state-wide Employment Rights Legal Service, which is delivered collaboratively with Redfern Legal Centre and the Inner City Legal Centre. KLC also runs a specialist Health Justice Partnership with the Prince of Wales Hospital and Eastern Suburbs Mental Health Service.

We have significant experience providing legal help to people who have experienced discrimination, including disability discrimination. In 2023 / 2024 our service helped 153 clients experiencing disability discrimination, providing 178 instances of legal advice, performing 30 legal tasks, and representing clients in 13 cases.

KLC is part of the UNSW Sydney Faculty of Law & Justice and provides clinical legal education to over 600 UNSW law students every year. We provide students with an experiential learning opportunity across all of KLC's work, including our work assisting people experiencing discrimination.

Recommendations

Recommendation 1: The Federal Government should establish a central accreditation scheme for assistance animals that would meet the requirements of section 9(a) of the *Disability Discrimination Act 1992 (DDA)*. Accreditation under this scheme should be an option, but not a requirement, for establishing that an animal is an assistance animal as contemplated by section 9 of the DDA;

Recommendation 2: The Federal Government should develop a national identity card for assistance animals;

Recommendation 3: The Federal Government should amend the *Disability Discrimination Act 1992* to extend protections to assistance animals that are in the process of being trained;

Recommendation 4: The Federal Government should ensure that any accreditation scheme is accessible, including for people on low incomes and people living in regional or remote Australia;

Recommendation 5: The Federal Government should co-design minimum standards for assistance animals with the disability sector, particularly with people who use assistance animals;

Recommendation 6: The Federal Government should implement an educational campaign so that duty holders are aware of their obligations to allow access to assistance animals;

Recommendation 7: The Federal Government should introduce a positive duty to prevent discrimination into all federal anti-discrimination laws, including the *Disability Discrimination Act 1992*.

Introduction

Kingsford Legal Centre supports efforts to streamline accreditation processes for assistance animals. Currently users of assistance animals grapple with a confusing legislative framework, with inconsistent federal and state requirements. Businesses and service providers (**duty holders**) are left confused about what is required and users of assistance animals are left in the gaps – often having their animals refused from public spaces where they are entitled to be. Each instance of refusal can cause significant hurt and distress and prevents people with disabilities from navigating the world with independence and confidence. At its core, assistance animals' access to public spaces is a human rights issue.

While we support the development of the National Principles, we emphasise the importance of properly resourcing services provided in line with the new National Principles and considering its interaction with the current requirements for assistance animals under the *Disability Discrimination Act 1992 (DDA)*. The National Principles should also ensure that the system is accessible – for people on low incomes, in regional and remote areas and for people who have self-trained animals.

Our submission draws on our legal service's experience providing discrimination advice to people across New South Wales, including under the DDA. Through anonymised case

studies, we draw attention to some of the issues currently affecting our clients. We comment on the suitability of the proposed principles to addressing these issues, particularly in relation to their interaction with the DDA. We are not however experts in the training requirements for assistance animals and recommend that the Government co-design any national framework with disability advocates and users of assistance animals.

Discrimination is common

Discrimination against people who use assistance animals is unfortunately common. KLC's clients and their assistance animals have been turned away from shopping centres, government services, and housing. Refusals have caused our clients significant distress, and in some cases prevented them from accessing basic rights like housing and equal access to government services. This has a significant impact on the ability of people who use assistance animals to go about their day-to-day life.

Case study: Toby* came to us for advice. Toby is currently homeless and relies on the use of his assistance dog Pavel* to manage his psychosocial disability. Despite Pavel having completed his training through a specialist organisation, Toby was refused accommodation because 'pets' were not allowed.¹ The accommodation service refused to recognise Pavel as assistance animal. We advised Toby that he can make a discrimination claim under the DDA, but that he might need to wait 9 to 12 months for a conciliation date.

*Names have been changed.

Case study: Joanna* suffers from anxiety and depression. Her assistance dog, Sparky*, helps her feel safe and enables her to go into public spaces to do her normal day-to-day tasks. Joanna came to KLC for help after an employee of a large retail store told her Sparky had to leave the store, even though he was dressed in his assistance jacket and card. Eventually a manager allowed Joanna and Sparky to continue in the store however the incident caused Joanna to feel a great deal of anxiety and resulted in her feeling great unease shopping at her local centre. KLC helped Joanna negotiate with the store who agreed to make a donation to a charity supportive of assistance animals as well as delivering training to all staff members about assistance animals. Joanna was very happy with the result as she felt it resolved her complaint and contributed to ensuring the discrimination won't happen to other assistance animal users in future.

*Names have been changed.

Case study: KLC assisted Tara* with two separate disability discrimination complaints concerning her assistance dog, Chloe*. Chloe had undergone training with an accredited organisation, passed the Public Access Test, and always wore her assistance animal vest when in public with Tara. Tara also carried Chloe's registration card with her at all times. Despite taking all these measures, Tara was refused access to a public bus while with Chloe. The bus driver argued with Tara, yelled at her to get off the bus and called her insulting names. This experience didn't just mean Tara did not get to work on time, it impacted on her mental health for a long period and meant she avoided her usual bus route for a long time, fearing this would happen again. A few years later, Tara was refused access to a government agency's customer service centre by a staff member who loudly

¹ This incident occurred before rental reforms came into force in New South Wales on 19 May 2025. See *Residential Tenancies Act 2010* (NSW) Division 8 for current legislation in relation to pets.

yelled at her in front of everyone else that she could not bring animals inside. Again, this had a deleterious effect on Tara's health.

KLC assisted Tara with discrimination complaints in both matters. Tara did everything right to make sure Chloe was identified as an assistance animal, and she still faced barriers when accessing public services she had every right to access. In both matters the respondents accepted that they needed to do more work to raise awareness among their staff about access requirements and rights for people with assistance animals.

*Names have been changed.

As shown by Toby, Joanna and Tara's cases, some businesses and social service organisations continue to discriminate against people who use assistance animals. From our discussions with opposing parties in discrimination matters, it is clear that many people are sceptical of the training that assistance animals undertake and their importance to people with disabilities. This is particularly true for animals that assist with psychosocial disabilities.² Many people in the general community are unaware of the role of assistance animals in managing psychosocial disabilities, an issue which is compounded by the general discrimination faced by people who are neurodiverse or experience mental ill health.

While complaints under the DDA are possible, the long wait times for a conciliation date at the Australian Human Rights Commission (AHRC)³ leave clients like Toby without meaningful access to justice. Delay often means clients cannot travel, find a place to live, or access services in the way most people take for granted. For many of our clients, a national accreditation system (combined with public information campaigns) would bolster the legitimacy of their assistance animals and prevent discrimination before it occurs. The system should be practical and easy-to-navigate for assistance animal users and duty holders.

Difficulty in proving assistance status and the need to do it over and over

The lack of a centralised approach to providing evidence of assistance animal's status and training places a significant burden on assistance animals users. Our clients often experience pressure from businesses and landlords to disclose highly personal information about their disability, as shown by Fred's story below.

Case study: Fred's* dog Lulu* helps him to manage his complex post-traumatic stress disorder (CPTSD). Fred had self-trained Lulu to detect and respond to panic attacks. Fred's landlord tried to evict from his rental property for having a 'pet'. The landlord was reluctant to accept Lulu's status as an assistance animal without detailed information about Fred's disability. Fred did not want to discuss details of his psychiatric condition (which he had developed in traumatic circumstances) with the real estate agent.

² We note however that there are also well-documented instances of guide dogs being refused access to taxis and ride-share services: Justice and Equity Centre, *After 32 refusals, Guide Dog user Paula is taking on Uber for discrimination* (19 February 2025) <<https://jec.org.au/disability-rights/disability-discrimination/after-32-refusals-guide-dog-user-paula-is-taking-on-uber-for-discrimination/>>.

³ Australian Human Rights Commission, *Make a Complaint* <<https://humanrights.gov.au/complaints/make-complaint>> (accessed 28 May 2025): "Complaints Update: Please note that due to a very large increase in complaints received by the Commission, there may be a significant delay in actioning complaints. The Commission will try to action complaints as soon as possible."

KLC helped Fred to make a discrimination complaint at the AHRC. At the conciliation, the landlord continued to doubt our client's claim that he had an assistance animal. Eventually the landlord agreed to compensate Fred and improve training for their staff. Fred was happy with the outcome but it was a stressful process that could have been avoided had the landlord complied with their legal obligations from the start.

*Names have been changed.

The lack of a standardised accrediting body (particularly for owners who have trained an assistance animal themselves) means that owners are often required to prove their animal's credentials anew. Fred would have benefitted from a system that allowed him to establish that Lulu was trained to alleviate the effects of his disability once and then use an established form of evidence, like a national identity card, in all future interactions with duty holders.

Inconsistent processes between states for the recognition of assistance animals also create a confusing and complex system that is difficult to navigate for assistance animal users. Some large national corporations, like Qantas, favour stricter jurisdictions with more stringent accreditation processes, requiring a more complex approval process for animals that have not been approved under Queensland's scheme (or accredited by trainers that are part of Assistance Dogs International).⁴ Under Qantas' approach, a person travelling with an animal trained by mindDog, a training organisation recognised by Service NSW,⁵ would need to separately apply to Qantas with evidence to support an "exemption" to Qantas' travel policies.⁶ This is clearly onerous and stressful.

Inconsistent accreditation requirements have seriously impacted KLC clients (like Francis, below) when attempting to fly interstate,⁷ causing great stress and sometimes preventing travel altogether.

Case study: Francis* was a KLC client several years ago. He had an assistance cat called Lorenzo* who he had trained to help him manage a psychosocial disability. Lorenzo regularly accompanied Francis on NSW public transport. Francis applied for permission to bring Lorenzo on a flight and provided evidence from a local council of his accreditation. The airline didn't think the evidence was sufficient and would not let Francis bring Lorenzo on the flight.

*Names have been changed.

Francis would have benefitted from a standardised approach to assistance animal accreditation. At the state government level, there is already some recognition of interstate schemes. For example, Transport for NSW recognises public transport

⁴ Qantas, *Service Dogs* <<https://www.qantas.com/au/en/travel-info/specific-needs/travelling-with-specific-needs/service-dogs.html>> (accessed 28 May 2025).

⁵ Service NSW, *Apply for an assistance animal permit* <<https://www.service.nsw.gov.au/transaction/apply-for-an-assistance-animal-permit>> (accessed 30 May 2025).

⁶ Qantas, *More Information to be provided for consideration for an exemption to Service Dogs Criteria for Carriage* <<https://www.qantas.com/content/dam/qantas/pdfs/fly/specific-needs/service-dogs/more-information-form.pdf>> (accessed 28 May 2025).

⁷ Note: not necessarily with Qantas.

accreditations from Victoria, Queensland, Western Australia, and South Australia.⁸ This approach should be expanded nationally and to all kinds of services.

The proposed National Principles need to work alongside the provisions of the *Disability Discrimination Act 1992*

While we support efforts to simplify accreditation of assistance animals, it is important for the National Principles to consider the current definitions under the DDA to avoid unintentionally reducing protection for assistance animal users. People who have self-trained their animals (in line with s 9(c) of the DDA) seem particularly at risk of being excluded from the framework.

The DDA defines an ‘assistance animal’ to include “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.”⁹

As noted by the Consultation Paper,¹⁰ the Federal Government has not prescribed any organisations under section 9(2)(b), so users of assistance animals rely on sections 9(2)(a) and (c). Under the DDA, duty holders are allowed to ask for evidence that the animal is an assistance animal and/or that the animal is trained to meet standards of hygiene and behaviour that are appropriate for an animal in a public place.¹¹

However, the DDA is silent as to what form of ‘training’ is required and what constitutes sufficient proof.¹² As stated in *Mulligan v Virgin Australia Airlines*,¹³ training does not need to be by a registered organisation or trainer. Owners are able to train animals themselves to alleviate the effects of a disability. A statement from the owner about the nature of the training might constitute sufficient evidence.¹⁴

The ability to self-train animals under section 9(c) of the DDA contributes to the accessibility of assistance animals, particularly in the context of high demand for animals from formal training programs.¹⁵ In our experience assisting people who have faced this type of discrimination, clients who have self-trained animals (as they are entitled to under the DDA) face particularly strong opposition from some duty holders. There is a risk that

⁸ Transport for New South Wales, *Assistance Animals Policy* (December 2022), Schedule C – Accepted interstate accreditation recognised by TfNSW <https://transportnsw.info/document/5511/transport_for_nsw_-_assistance_animal_policy.pdf> (accessed 28 May 2025).

⁹ *Disability Discrimination Act 1992* (Cth) s 9.

¹⁰ Department of Social Services, *National Principles for the Regulation of Assistance Animals* (Consultation Paper: 2025) 2.

¹¹ *Disability Discrimination Act 1992* s 54A(5).

¹² *Mulligan v Virgin Australia Airlines* [2015] FCAFC 130.

¹³ *Ibid.*

¹⁴ *Ibid* [65], referencing a submission by the Australian Human Rights Commission.

¹⁵ Some services like Assistance Dogs Australia have currently closed their waitlist due to high demand: Assistance Dogs Australia, *FAQs* <<https://www.assistedogs.org.au/about-us/faqs/>> (accessed 28 May 2025).

creating national principles that do not apply to self-trained animals would create a two-tiered system which would disadvantage many assistance animal users.

Case study: Thomas* had trained his cat Cleo-cat-ra* to alleviate the effects of his psychosocial disability. He carried evidence of his disability and the significant training that he had undertaken with Cleo. We represented Thomas in several discrimination complaints against businesses and government services that refused to admit Thomas and Cleo. Many businesses were under the mistaken belief that only dogs could be assistance animals and that only animals from formal training organisations had the protection of discrimination law.

*Names have been changed.

As shown by Thomas' example, the National Principles should carefully consider the position of people with self-trained animals. If self-trained animals are unable to be accredited with a national ID card, there is a risk that people with self-trained animals will face an *increase* in discrimination. The National Principles should consider the impact of any reforms on people with self-trained animals and, as far as possible, extend the benefits of the principles to people who have trained their animals in line with section 9(c) of the DDA. For example, a national identity card could be made available to service animals that can show they meet the requirements for an assistance animal under the DDA, including self-trained animals. At a minimum, a national accreditation scheme should be an option but not a requirement for users of assistance animals.

Recommendation 1: The Federal Government should establish a central accreditation scheme for assistance animals that would meet the requirements of section 9(a) of the *Disability Discrimination Act 1992 (DDA)*. Accreditation under this scheme should be an option, but not a requirement, for establishing that an animal is an assistance animal as contemplated by section 9 of the DDA;

Recommendation 2: The Federal Government should develop a national identity card for assistance animals.

Assistance animals-in-training are not adequately protected by discrimination law

There is currently a gap in protection under discrimination law while an assistance animal is being trained. During this time, animals do not meet the DDA's definition of assistance animals, which require animals to be accredited or trained.¹⁶ It can take some time for assistance animal training to be completed. According to the Australian Support Dogs website, training could take two years.¹⁷ MindDog suggests that if a person is training their own animal it could take 12 to 15 months before an animal is ready to take the Public Access test.¹⁸ This means that many people are effectively excluded from having an assistance animal.

Case study: Lara* came to us at a community outreach asking for tenancy advice. She had been recommended an assistance animal by her GP for anxiety and was looking into getting a dog through the provider mindDog. Lara would have limited protection while her dog was in training and she did not believe her landlord would approve a pet.¹⁹ Lara said she probably wouldn't bother trying to get an assistance animal.

*Name has been changed.

Case study- Hugo*, a pensioner with several physical and psychological disabilities, came to KLC for assistance after his owners corporation issued him with a notice to remove his assistance animal, Patch*, a Jack Russell.²⁰

Hugo got Patch after his doctor recommended that he have an assistance animal to assist him with everyday living. Hugo had Patch as a puppy and was in the process of having him trained through an accredited assistance animal training organisation. As Patch was still in training, he had not yet completed his training or received any certification. Despite providing evidence from Hugo's doctor about the need for Patch, evidence from the training organisation that Patch was completing the program, as well as evidence Patch had been registered as an assistance animal with the local council, the owners corporation refused to agree to let Patch stay.

KLC assisted Hugo to make a disability discrimination complaint to the Australian Human Rights Commission (AHRC) and assisted him throughout the complaints process. This process took many months and was very stressful and upsetting for Hugo as he was also living alongside members of the owners corporation throughout this time. Before the complaint was resolved, Hugo moved out of the premises and withdrew his complaint due to the distress and stress that the process was causing him.

*Names have been changed.

Lara and Hugo's cases demonstrate the challenges that people with disabilities face while training their assistance animals. While Lara and Hugo's positions would have been

¹⁶ *Disability Discrimination Act 1992* s 9.

¹⁷ Australian Support Dogs, *Home* <<https://www.asdog.org.au/>> (accessed 27 May 2025).

¹⁸ mindDog, *The Process* <<https://www.minddog.org.au/the-process/>> (accessed 27 May 2025).

¹⁹ This case study occurred prior to tenancy reforms to make it easier for people to have pets. See *Residential Tenancies Act 2010* (NSW) Division 8 for current legislation.

²⁰ This case study occurred prior to strata reforms and tenancy reforms to make it easier for people to have pets. See *Strata Schemes Management Act 2015* (NSW) s 137B, *Strata Schemes Management Regulation 2016* (NSW) s 36A, and *Residential Tenancies Act 2010* (NSW) Division 8 for current legislation.

different following NSW pet reforms to strata and tenancy law,²¹ the cases demonstrate an ongoing vulnerability for people with animals in training in other areas of public life.

Some governmental organisations have procedures in place for animals in training (like Transport for NSW's recognition of animals being trained by recognised organisations or temporary training permits for self-trained animals),²² however our clients tend to face pushback from smaller private entities (like private landlords).

The DDA should be amended to specifically state that an animal in the process of completing their training should also be treated as an assistance animal. New Zealand's *Dog Control Act 1996* for example, defines a 'disability assist dog' as a dog certified as a dog that has been "trained (*or is being trained*) to assist a person with a disability" (emphasis added).²³

Recommendation 3: The Federal Government should amend the *Disability Discrimination Act 1992* to extend protections to assistance animals that are in the process of being trained.

A national approach needs to prioritise accessibility

Any national approach to assistance animals should ensure that assistance animal accreditation is readily accessible to people on low incomes, to people living in regional or remote areas, and for people with different kinds of disabilities. Service capacity will also need to be expanded to manage wait times. Governments should regularly consult with disability services and assistance animal users to identify and respond to barriers to access. Assistance animals support the human rights of people with a disability and access should be considered a human right.

Training programs and Public Access Tests (**PAT**) for assistance animals should be readily available at no or very-low cost. As observed by a coalition of advocacy organisations led by the Australian Autism Alliance,²⁴ current National Disability Insurance Scheme guidelines exclude many people who would benefit from assistance animals. While some assistance animal programs are subsidised by donations,²⁵ cost may be a barrier for people on low incomes, including people on the Disability Support Pension.

Special consideration might need to be given to people living in regional and remote Australia. As part of our state-wide sexual harassment and discrimination legal service, KLC provides advice to people living in regional NSW. Many regional communities

²¹ Ibid.

²² Transport for New South Wales, *Apply for an Assistance Animal Permit* <<https://www.service.nsw.gov.au/transaction/apply-for-an-assistance-animal-permit>> (accessed 26 May 2025); Transport for New South Wales (n 8).

²³ *Dog Control Act 1996* (New Zealand) s 2.

²⁴ 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, *Joint Statement Calling for People with Disability's Access to Assistance Animals to be Protected* (Statement, 20 March 2025).

²⁵ mindDog Australia, *Fees* <<https://www.minddog.org.au/the-process/fees/>> (accessed 28 May 2025); Guide Dogs (NSW), *Guide Dogs* <<https://nsw.guidedogs.com.au/our-dogs/guide-dogs/>> (accessed 28 May 2025).

experience gaps in disability service provision. The Consultation Paper seems to suggest that accredited training and a PAT might be required for a person to be eligible for a national identity card. It is important that people in regional areas are also able to gain the benefit of the national assistance animal principles, including a national identity card even if an accredited training program or PAT is not accessible in their area.

Accessibility can also be improved by ensuring that accreditation requirements are not unduly onerous. Governments should consult with disability organisations to make sure that training requirements and PAT tests are appropriate for different kinds of animals addressing different kinds of disabilities.

Case study: Several years ago, KLC assisted Hugo* in a discrimination dispute with his owners corporation (discussed above). Hugo lived in an apartment with his dog Patch.* Patch had been trained to assist Hugo with his disabilities and was in the process of getting accreditation through a training organisation via a PAT (which was extremely rigorous). Hugo's owners corporation objected to Patch living in the building. Although Patch was well-behaved in public, the owners corporation demanded evidence of Patch having passed a PAT. One element of the PAT was challenging for Patch, so Patch was not able to pass the PAT.

*Names have been changed.

Although Hugo would be better protected today by reforms to pets in strata,²⁶ this case study demonstrates the challenges that otherwise well-behaved animals might have in passing onerous PAT requirements. The Government should consult with the disability sector and assistance animal users to ensure that they strike the right balance when setting PAT requirements.

Reaccreditation should not be unnecessarily frequent. There are currently differences between states as to the duration of validity of public transport passes – Queensland Handlers Identity Cards, for example, last for 3 years,²⁷ while NSW Assistance Animals Permits last for 2 years.²⁸ We support longer validity periods to reduce the administrative burden faced by assistance animal users.

Recommendation 4: The Federal Government should ensure that any accreditation scheme is accessible, including for people on low incomes and people living in regional or remote Australia;

Recommendation 5: The Federal Government should co-design minimum standards for assistance animals with the disability sector, particularly with people who use assistance animals.

²⁶ *Strata Schemes Management Act 2015* s 137B; *Strata Schemes Management Regulation 2016* s 36A.

²⁷ Guide, Hearing and Assistance Dogs, *Handler's Identity Cards* (January 2024) <https://www.qld.gov.au/__data/assets/pdf_file/0032/475385/handlers-identity-cards.pdf> (accessed 28 May 2025).

²⁸ Transport for New South Wales (n 8) 11.

The National Principles should be supported by large-scale public education efforts and a positive duty to prevent discrimination.

Many of our clients have experienced disability discrimination because service providers have not been aware of laws protecting users of assistance animals. To maximise the impact of the proposed National Principles, governments should invest in community education.

Case study: Tara* (discussed above) went to the offices of a government agency's customer service centre with her psychiatric assistance dog Chloe*. Chloe was wearing her yellow vest identifying her accreditation with an assistance animal training provider. Despite this, a frontline worker told Tara she wasn't allowed to have a 'pet' on the premises. Tara became distressed and a manager was called. Eventually Chloe was allowed to stay at the offices but Tara was very distressed by the incident.

We represented Tara in a discrimination complaint at the Australian Human Rights Commission. The service provider apologised and agreed to update their signage and training policies.

*Names have been changed.

As Tara's case shows, many duty holders are not aware of their obligations under anti-discrimination law and many have not adequately trained frontline staff to comply with the law. The creation of national principles should be backed by community legal education for duty holders. Amending federal discrimination law to establish a positive duty to prevent discrimination, including disability discrimination, would further encourage duty holders to provide the necessary training for frontline staff.

Recommendation 6: The Federal Government should implement an educational campaign so that duty holders are aware of their obligations to allow access to assistance animals;

Recommendation 7: The Federal Government should introduce a positive duty to prevent discrimination into all federal anti-discrimination laws, including the *Disability Discrimination Act 1992*.

Please let us know if you have any questions about this submission. You can reach us at legal@unsw.edu.au.

Yours faithfully,
KINGSFORD LEGAL CENTRE



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