



# Oriel College

UNIVERSITY OF OXFORD

## **ASSISTANCE DOGS POLICY**

Version: v.3

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## A. Introduction

Thousands of disabled people rely on an assistance dog to help them with day to day activities that many people take for granted. Assistance dogs are trained to help people with blindness, hearing difficulties, epilepsy, diabetes, physical mobility problems, and other disabilities. Assistance dogs carry out a variety of practical tasks for people as well as supporting their independence and confidence.

### Legal Obligations

A disability is defined by the Equality Act 2010 as a physical or mental impairment which has a substantial and long-term adverse effect on the ability of the individual to carry out normal day-to-day activities.

It is unlawful to discriminate against a disabled person in the following ways:

- Direct discrimination (Treating a person less favourably than others because they are disabled or perceived to be disabled. For example, refusing to allow entry to disabled people, whether or not they have an assistance dog).
- Indirect discrimination (Where a particular policy disproportionately impacts disabled people compared to the non-disabled. For example, a “no dogs” policy will have a greater negative impact on disabled people using assistance dogs, and could be counted as indirect discrimination unless the policy can be objectively justified).
- Discrimination arising from disability (Treating an individual less favourably because of something relating to their disability. For example, refusing the same level of service to a disabled person because they have an assistance dog).

The Equality Act also recognises the following:

- Positive discrimination (The law recognises the particular disadvantages that disabled people face, and so treating disabled people more favourably is permitted).
- Reasonable Adjustments (where a physical feature, provision or practice puts a disabled person at a substantial disadvantage, the College has a duty to take responsible steps to avoid that disadvantage. For example, it will often be reasonable to disapply a “no dogs” policy for assistance dogs owners).

## B. Information Security Classification

This policy represents part of the College’s wider commitment to producing an inclusive and supportive working and learning environment, and demonstrates how it meets its legal obligations. Therefore, it will be available on the College website.

The policy will also be available internally via the College’s policy SharePoint resource, and from the governance officer ([governance@oriel.ox.ac.uk](mailto:governance@oriel.ox.ac.uk)).

### C. Delegated Authority

The Head of HR and the Domestic Bursar are responsible for this policy. The Head of HR and Domestic Bursar are expected to work collaboratively to ensure that the staff and student body are aware of the College's policy on assistance dogs where appropriate, and their responsibilities under this policy.

The Domestic Bursar will be responsible for supporting the measures to aid students with assistance dogs, while the Head of HR will be responsible for overseeing arrangements for staff.

The Domestic Bursar will bring the policy for review to the House Committee at least once every two years, or in line with relevant regulatory changes (whichever is sooner).

### D. Policy Statement

This policy details College's approach to accommodating Assistance Dogs into the workplace and university environment. This policy is intended to support both staff and employees within the College Community.

This policy ensures that disabled people do not suffer any kind of discrimination while taking part in College life and day-to-day activities around College, satisfying the College's legal obligations outlined in **section A**, and realising College's commitment to promoting a continually inclusive and supportive environment.

### E. Definition of Terms

#### Assistance Dogs

An assistance dog is a dog that has been trained to assist a person with a specific disability and that has been accredited by one of the organisations registered as a member of Assistance Dogs (UK) or the International Guide Dog Federation. The registered organisations include:

- Guide Dogs
- Hearing Dogs for Deaf People
- Support Dogs
- Dogs for Good
- Canine Partners
- The Seeing Dogs Alliance
- Dog AID
- Medical Detection Dogs

Types of Assistance Dogs include:

- Guide dogs which assist people who are blind or visually impaired.
- Hearing dogs which assist people who are deaf or hearing impaired.
- Support dogs or dogs for the disabled. A support dog can be trained to do many tasks which their owner may find difficult or impossible.
- Seizure alert dogs for people with epilepsy.

Assistance Dogs trained by members of Assistance Dogs (UK) have formal identification tags and are allowed to accompany their owner at all times and in all places within the UK (unless there is a genuine health and safety risk).

On the grounds of health and safety responsibilities to staff, students and visitors, the University reserves the right to refuse access for a dog that is:

- Not qualified by one of the five membership organisations of Assistance Dogs (UK)
- From another nation which does not meet full membership criteria of the established international assistance dog organisations (Assistance Dogs International, Assistance Dogs Europe, International Guide Dog Federation).

Before bringing an assistance dog into the UK, you must ensure that the organisation you are registered with is accredited to Assistance Dogs (UK) which is a registered charity that welcomes applications for full membership from other charities that have been accredited by the Assistance Dogs International Guide Dogs Federation.

Assistance Dogs are not pets. They:

- Are highly trained.
- Will not wander freely around the premises.
- Will sit or lie quietly on the floor next to its owner.
- Are trained to go to the toilet on command and so are unlikely to foul in a public place.
- Are instantly recognisable by the harness or identifying coat they wear.

Assistance dog owners will have received full training on how to manage their animal. As the working life of an assistance dog is about six years, a dog owner could have several dogs during their lifetime.

## **F. Procedure**

### Allowing an Assistance Dog on College Premises

Under the Equality Act 2010, the admittance and accommodation of assistance dogs could be a reasonable adjustment for disabled employees and students. The College will give appropriate consideration to requests for dogs to be accommodated in the workplace or as part of student life in College.

The College will undertake an impartial and objective assessment if the suitability of an assistance dog to an employee or student's workplace, accommodation and day-to-day activities, seeking advice from assistance dog associations.

If the College agrees to the employee or student's request to accommodate an assistance dog, the College will make subsequent arrangements to enable the effective implementation and use of the assistance dog in the workplace or while on College premises.

### Assistance Dogs used by employees

This will include allowing the employee to have reasonable time off for training the assistance dog, taking the dog for veterinary checks and agreeing to

accommodate check-ups by the training association. Training for both employee and dog may well be provided by the assistance association and consideration will be given to supporting reasonable and proportionate leave requirements for this.

#### Assistance Dogs used by students

##### *1. The college: Arrangements, Roles, and Responsibilities*

On request, the college will provide familiarisation with and orientation on campus as part of induction. This will be provide by the Academic staff.

The College provides guidelines for staff and students on how to interact with assistance dogs. This information can be found in Appendix 3.

The College is happy to listen to the suggestions of assistance dog owners as to how the College provision for assistance dogs could be reasonably improved

##### *2. University: Roles and responsibilities*

Disability advisory service (DAS) stage 1

Students or offer-holders must submit a request to [disability@admin.ox.ac.uk](mailto:disability@admin.ox.ac.uk) if they need to bring

their assistance dog into College buildings, as soon as possible and at least 4 weeks before access is required.

The requests should include:

- which university and college premises the student wishes their dog to access, with particular attention towards accommodation
- additional details that can be provided (e.g., which parts of the premises, likely duration of the access, etc).
- evidence from a medical practitioner (e.g., a GP) of:
  - their disability
  - if possible, their medical need for an assistance dog to assist in matters where they
- are disadvantaged by their disability in each setting(s) for which access has been requested, and
- if possible, information about how the assistance dog will help them with the matters in question.

Conditions:

The dog should be recognised as an assistance dog under the University's definition and

required access evidence of training their dog has received to meet the required standards of behaviour. Certification of training by an ADUK/ADI member organisation is required.

Disability advisory service (DAS) stage 2

If DAS identifies a dog as an assistance dog under the University's procedures under Stage 1, they

will forward the relevant information to the relevant to the in-house Academic team. They will then pass on the relevant details to the domestic teams as required. 3. Local: Roles and responsibilities

### *3.1 Facilities (Accommodation office)*

When a resident student has an assistance dog, the Accommodation Office is responsible for informing other students in that household, who are likely to come into contact with the assistance dog and for asking them to confirm that they would not be adversely affected by the presence of the dog.

### *3.2 Facilities (oversight)*

The Domestic Bursar is responsible for ensuring a suitable and sufficient risk assessment has been carried out prior to assistance dogs coming on site. They should ensure the risk assessment is reviewed at regular intervals (preferably every 12 months), when there are changes to the hazards in the workplace, or after an incident.

### *3.3 Academic team*

Academic team will advise students with assistance dogs and signpost them to this policy to make them aware of the help provided by the University and their rights and responsibilities. If required, they will liaise with the Accommodation team on reasonable adjustments and update the student accordingly. Also, they will also inform the Exams Team of students who will need an assistance dog in exams.

### Considerations for risk assessment

The main risks associated with keeping animals in the workplace are physical injury, by bites, scratches, kicking or crushing and infection or infestation from micro-organisms or parasites, zoonoses (an infectious disease that has jumped from a non-human animal to humans), and asthmatic or allergic reactions. Other considerations:

- Has consideration been given to others that will come into contact with the animal who may be asthmatic or allergic, have phobias etc.?
- What hazards does the animal present? e.g., tripping, bites, scratches, transmission of diseases
- By what routes can any micro-organisms be transmitted to humans? e.g., hand to mouth contact, bites, scratches, or through the air
- Animals are regarded as potential sources of infection or infestation, does the animal have regular check-ups at the vet and have updated vaccinations, flea, and worming treatment, where applicable?

- What will be the procedure in an emergency e.g., in the event of a fire, how will animals be evacuated without causing a hazard to others evacuating the area?
- Has the animal been toilet trained?
- Will the animal be kept secure on a lead? Away from walkways to prevent slip, trip and fall incidents.
- Would the animal create a likely source of distraction/disruption for others, such as in lectures or workplaces where high levels of concentration are required?
- Animal welfare facilities
- Animal waste disposal facilities
- Animal smells
- Animal noise e.g., barking
- Human hygiene (after petting)
- What behavioural training does the animal have?
- How will the animal respond to being left alone and the security of the animal when left alone e.g., when the owner goes in a meeting or to the bathroom?
- The areas the owner is likely to visit during the course of their day
- Are people likely to visit the area where the animal is normally based?
- Are there any new or expectant mothers working in the area?
- Do children visit / pass through the area?
- What other animals may be present? (Are they territorial)

#### Religion and Belief

If colleagues or fellow students in College raise objections on religious grounds to the presence of an assistance dog, these should be duly considered and managed locally.

It is unlikely that an objection on religious grounds will be sufficient justification not to approve an assistance dog request, in accordance with the justification defence set out in the Equality Act 2010.

The Equality and Human Rights Commission (EHRC) states in its guide for business on assistance dogs that the Muslim Shariat Council has clarified that Muslim staff members should accept assistance dogs in businesses.

Should the need arise, further assistance should be sought from organisations such as the EHRC, in conjunction with assistance dog associations and HR or the Domestic Bursary.

## **G. Scope**

All College members are expected to comply with this policy. All staff and students who are uncomfortable with any of the measures set out in this policy should contact the HR department or Domestic Bursar as appropriate, as per **section I** of this policy.



College members should be aware that making reasonable provision for the use of a trained assistance dog for those who require one is a fulfilment of its legal obligations.

## H. Training and Responsibilities

The responsibilities of the employee or student, line manager or Senior Dean, and the employee's co-workers or the student's immediate peer group, should be clarified before the assistance dog accompanies the employee to work. The following are outline responsibilities for each group.

### Dog Owners:

- Ensuring that the assistance dog meets all standards for training, health, and grooming at all times (standards are set by the assistance dog association).
- Applying appropriate control, praise, and discipline to the dog as required, to maximise support and minimise any workplace disruption (such as excessive barking).
- Take steps to avoid the assistance dog causing damage to College property.
- Providing necessary equipment for the dog's wellbeing, for example a blanket or bed, water bowl, and toys.
- Ensure the assistance dog is not left unattended whilst in College.
- Ensuring that the dog is kept on its lead at all times while on university property.
- Exercising the dog away from university property.
- Managing spending breaks and water provision as required. The College does not provide outside exercise facilities and would require the lawn area of the Quads **NOT** to be used for spending (toileting) purposes.
- Being considerate of the needs of others in relation to the presence of the employee's assistance dog.
- Ensuring that, while working, the dog wears a jacket, harness, or tabard to indicate to the assistance dog and others that it is not working.

Dog owners should be aware that any damage caused by the dog will be charged to its owner.

### Fellow staff members and students

- Taking instruction from the assistance dog owner in relation to contact with and approach to the animal (it is inappropriate to stroke, feed, or otherwise engage with the dog unless the owner has given permission).
- Addressing the owner of the dog rather than the dog itself, and limiting contact with, and distractions for, the animal.

### Line Manager (for employees) or Domestic Bursar (for students)

- Providing a suitable and safe location for the assistance dog, close to the owner's workstation or accommodation if possible. The location should be draught-free, of suitable temperature and away from machinery, light or noise that may cause disruption to the dog.
- Facilitating toileting and other wellbeing breaks as required and generally providing a welcoming environment for the owner and their assistance dog.

- Providing or scheduling appropriate levels of time off for aspects such as dog training and veterinary visits, and accommodating visits from assistance dog associations.
- Communicating with all impacted staff and students ahead of the assistance dog's arrival, to help integrate the animal successfully and create an inclusive College environment for the dog's owner. Care should be taken to respect the owner's confidentiality needs, particularly if the disabilities or health conditions that the assistance dog supports are non-visible.
- Ensuring that colleagues and/or fellow students continue to fulfil their responsibilities.

## **I. Internal Help and Raising Concerns**

Any staff or students who feel that their disability needs have not been appropriately met by this policy, or that this policy has not been sufficiently implemented, are invited to address their concerns to the HR department or the Domestic Bursary as appropriate.

Any College member who is unsatisfied with the provisions put in place to accommodate a trained assistance dog are welcome to share their concerns with the HR department or Domestic Bursary as appropriate, bearing in mind that allergies or religious objections are not usually sufficient justifications to refuse an assistance dog request.

## **J. Consequences of Non-Observance**

Any owner of an assistance dog who does not abide by the stipulations of this policy will be reminded of their responsibilities under this policy in the first instance. Repeat violations will lead to a grace period for the assistance dog owner to make alternative arrangements.

Any College member who is found to be violating their responsibilities under this policy, contrary to the wishes of an assistance dog owner, will be reminded of their responsibilities in the first instance. Repeat offence will lead to disciplinary action from the Senior Dean or HR department as appropriate, including relocating a student or staff member's workspace or accommodation.

## **K. Further Help**

Students should direct their concerns to the Domestic Bursary.

Staff members should direct their concerns to the HR department.

## **L. Reference**

This policy should be read in conjunction with the College's Equal Opportunities Policy and Code of Conduct and Anti-Harassment policy.

**M. Policy version control table**

| <b>Version</b> | <b>Owner</b>    | <b>Agreed by House Committee</b> | <b>Agreed by Governing Body</b> | <b>Reason for amendment</b>   | <b>Amended by</b>  | <b>Next review</b>  | <b>Further notes</b>                                                                                                                                                                    |
|----------------|-----------------|----------------------------------|---------------------------------|-------------------------------|--------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| v.1            | Domestic Bursar | 12 January 2022                  | 19 January 2022                 | This is the original version. |                    | <b>October 2022</b> | v.1 was approved, in the first instance, by the General Purposes Committee. v.2 and beyond have been approved, in the first instance, by the House Committee.                           |
| v. 2           | Domestic Bursar | 16 November 2022                 | 30 November 2022                | Updated to include students   | Governance Officer | <b>October 2024</b> |                                                                                                                                                                                         |
| v.3            | Domestic Bursar | 23 October 2024                  | 13 November 2024                | Review cycle                  | Domestic Bursar    | <b>October 2026</b> | v.3 seeks greater alignment with the University by referencing specific roles and responsibilities of the DAS, facilities oversight, accommodation office and academic/welfare support. |