Animals on Imperial Property Policy

Imperial Property Division

Version: V3

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Introduction

Imperial generally prohibits individuals from bringing animals inside any Imperial London College owned, leased, or controlled buildings, vehicles or structures.

Imperial recognises that companion animals often provide great support and comfort to many people. The university, in adhering to its legal obligations, including those under the Equality Act 2010 as well as the Health and Safety at Work Act 1974 also recognises the need for campus users; including Staff, Students and visitors to work and study in an environment that is healthy and safe. Many people may be physically uncomfortable around animals, however well behaved those animals may be. There are also potential issues of allergy and hygiene that those who do not own animals may find unacceptable within their environment. In some cases, animals may be disruptive either in normal circumstances or, potentially, in an emergency.

The main hazards and concerns associated with having animals in Imperial premises are:

- Stalled or delayed evacuation of a building in an emergency
- Aggressive behaviour of animals
- Allergic reactions and transmission of disease
- Zoophobia (phobia of animals that causes distress or dysfunction in an individual's everyday life)
- Slips, trips and falls
- Animal waste
- Damage to University property
- Disinfestation and cleaning costs associated with fleas and ticks

It is acknowledged that these hazards also apply to Imperial's grounds, albeit to a lesser extent. To minimise these risks, subject to the five exceptions explained in this policy, animals are not permitted in the university's buildings (including halls of residence).

Policy

- It is Imperial policy that, subject to Equality Act 2010 compliance and limited exceptions, animals are not allowed into its premises including workplaces, or its residential accommodation.
- No animals should be left in parked vehicles on campus.
- Animals must not be brought onto campuses or tied up outside buildings.
- Animals are also not permitted on our playing fields or sports facilities.

Exceptions to this Policy

1. Assistance Dogs

Assistance Dogs (guide dogs, hearing dogs, service or support, seizure alert dogs) are highly trained animals used to mitigate a wide range of disabilities including a wide range of mental health and neuro-divergent conditions (such as anxiety, PTSD & autism). As well as being highly trained to support disabled users, Assistance Dogs can also provide emotional and psychological wellbeing and improve the confidence of disabled people who use them. Under the Equality Act 2010 makes it unlawful to refuse access or service to a disabled person accompanied by an Assistance Dog and can freely enter public spaces and use public transportation. This will also apply to most of the university's areas including food service outlets, sports facilities, libraries and most teaching areas.

Therapy Animals (TA) or Emotional Support Animals (ESA), by contrast, do not have the same legal protections under the Equality Act 2010. Therefore, they are not allowed inside any Imperial owned, leased, or controlled buildings, vehicles or structures. While they can offer comfort and emotional support, they are not trained to perform specific tasks that mitigate disabilities in the same way that Assistance Dogs are.

However, in exceptional circumstances, Assistance Dogs may be excluded from certain areas, such as laboratories or animal units, due to potential biosecurity issues, of health and safety concerns. These exclusions must be justified and proportionate, based on risk assessment conducted by local management, with support from the Safety Department if necessary. This should not be interpreted as a blanket ban, and exclusions will only apply where necessary.

To enhance the experience of Assistance Dog owners while on Imperial property, it may be reasonable to agree site-specific guidelines such as access to communal areas. These will be produced by the Property Division in collaboration with relevant stakeholders and Assistance Dog owners. Owners will be required to comply with the conditions set out in these guidelines.

Assistance dogs may:

 Be trained by a member of <u>Assistance Dogs UK</u> (AD(UK)), a coalition of assistance dog organisations listed below or an equivalent organisation in another country, or they may be owner trained.

- Have a formal identification in the form of branded jackets or lead slips.
- Have the yellow ID booklet from the AD(UK) member organisation. This ID book contains information about the owner and their dog, details of the training organisation who trained the dog and its owner.

Responsibilities

University members with a disability who utilise an Assistance Dog (or one in training) should notify the following:

- a. Students inform the Disability Advisory Service
- b. Staff inform Equality, Diversity and Inclusion Centre
- c. Visitors/other people accessing Imperial property must inform the people or person they are visiting that they will be bringing an Assistance Dog. This will allow any preparations to be made if necessary.

Assistance Dogs Owners' Responsibilities

Information

Assistance Dog owners must request permission from Imperial to bring their dogs into the estate in advance of arrival on university premises. They should be able to provide information about their dog and its tasks/duties.

Identification

Owner must ensure that their Assistance Dog is clearly identifiable by their special collars and/or harnesses when on duty. However, the law does not require the dog to wear a harness or jacket.

Insurance

Owners are responsible for ensuring that their Assistance Dogs are covered by full liability insurance.

Access restrictions

Assistance Dog owners must respect access restrictions established by the university on grounds of health and safety. Owners must ensure that assistance dogs do not enter staff and students' privately assigned spaces, such as bedrooms and flats within residences without permission.

Animal Misbehaviour

Assistance Dog owners are responsible for preventing and correcting their dog's misbehaviour, ensuring the dog does not cause harm or injury to others and damage to the university's property.

Canine Diet

Assistance Dogs must not be fed on raw animal protein due to the risk of shedding salmonellae and other potential pathogens.

Waste Management and Clean-up

Assistance Dog owners are responsible for cleaning up their dog's waste within their ability. Owners must provide suitable walking areas for their Assistance

Dogs and dispose of waste in external bins. Registered blind individuals are exempt from cleaning up their dog's waste and so should train their dog to prevent waste on campus. The university cleaners will only handle deep cleaning.

Care and Supervision

The owner must ensure their Assistance Dog is up to date with all relevant vaccinations, flea and worming treatments. They must also meet their dog's needs for feeding, grooming, watering and toileting. Assistance Dogs must always be kept on lead and never left unsupervised. Dogs that are ill, poorly groomed, or excessively unclean may need to be removed from the university premises. Imperial is not liable for loss, ill health or death of an Assistance Dog.

Emergency Procedure

In the event of an emergency the owner will be responsible for the evacuation of their Assistance Dog.

Animal training

Owners are responsible for the training needs of their Assistance Dogs and for ensuring the correct and safe performance of their duties. Some, but not all, Assistance Dog owners will carry an ID booklet from AD (UK) member organisation, which provides information about their dog and the training organisation. However, this is not a legal requirement, and an Assistance Dog owner should not be refused service simply because they do not possess an ID booklet. Assistance Dogs can also be owner-trained, with the owner selecting their own dog to meet their specific needs.

Responsibilities of Others

Please note Assistance Dogs are at work and to be treated as 'auxiliary aids', performing tasks to assist individuals with disabilities and are not pets. Remember to address the owner, not the Assistance Dog. However, be mindful that owners may not always have time to stop and engage in conversation.

Members of the University community must not:

- Feed, pet or praise assistance dogs.
- Deliberately distract or startle an assistance dog; or
- Separate or attempt to separate an assistance dog from the person relying on its service.

Behaviour of Seizure Alert Dogs

Seizure alert dogs are trained to behave differently when they detect a potential seizure, which may appear as misbehaviour. Some Assistance Dogs use unique alerts and behaviours to support their handler's disabilities, which may not be easily understood by the university community. For example, these alerts might include jumping up at the handler, barking, or pawing repeatedly. Other behaviours may involve barking for help or ignoring cues, such as continuing a medical alert even when told to

settle, until the owner responds. It is reasonable to request a list of any trained behaviours that might be mistaken for misbehaviour, ensuring staff understand that the dog is performing its duties.

2. Laboratory Animals

Laboratory animals are subject to separate policies and controls, Imperial is being strongly committed to reaching the very best level of international practice.

Our stated policy is that animals may only be used in research programmes where their use is shown to be essential for developing new treatments and making medical advances.

3. Approved working animal

An animal, usually a dog, which provides other services within Imperial, such as assisting in law enforcement.

4. Workplace Wellbeing Events

It is recognised that interaction with animals (e.g. trained and temperament-assessed dogs) can have beneficial therapeutic effects, promoting wellbeing. With prior approval from the Property Division and subject to pre-event logistics and risk assessment, these can proceed when agreed.

Security Procedures

If an animal (other than those mentioned in points 1-4 above) is found in any Imperial building, grounds or vehicle, immediately contact the Security Control Room +44 (0)20 7589 1000 (external).

For other security contacts, including those at other campuses, please refer to <u>security</u> contact information.

In the case of a stray dog, fox or any wild animal, do not attempt to handle or restrain it. Wait for security.

Document revision dates

Version	Date	Reason
V1	February 2016	Web links updated
V1.1	November 2016	Addition information provided on assistance dogs and site- specific requirements, owners' responsibilities therapy and working animals added.
V1.2	June 2018	Change of departmental name.
V1.3	June 2021	Added document to standard template.
V1.4	September 2022	Equality Act Compliance made explicit, added workplace wellbeing events.

V2.1	May 2023	Therapy animals' sections expanded to included non- prescribed animals and the need for EIAs.
V2.2	November 2023	Added Emotional Support Animals. Job Titles updated and other minor amendments to improve clarity including flow chart.
V2.3	December 2023	References to 'College' replaced by 'University'.
V2.4	January 2024	Information provided by a disability advocate incorporated.
V3	September 2024	Increased clarity on policy exceptions, and procedures. Wording and information reviewed by legal department. Document branding updated.

Feed into the risk assessment:

- Building manager
- Representative from department
- Security and fire