

ITALIA CONTI

Assistance Dogs Policy

Approved by: Senior Leadership Team	19 th December 2022
Reviewed by:	Quality Assurance Team
Checked by:	Chief Operating Officer
Date:	19 th December 2022
Next Review	19 th December 2023

This policy will be reviewed and approved by the Senior Leadership Team annually.

Italia Conti

1. Introduction	3
2. Policy scope	3
3. Definitions	4
4. Requests for permission to use an Assistance Dog	5
5. Characteristics of an Assistance Dog.....	5
6. Responsibilities of the Italia Conti community	6
7. Organisational and Physical Arrangements	6
8. Supporting the use of an Assistance Animal	7
9. Roles and Responsibilities (Italia Conti)	7
10. Assistance Dog Users' Responsibilities	8
11. Conflict Situations - Removal of Assistance Dogs.....	10
12. Damage/distress	10
13. Restricted access	10
14. Conflicting disabilities	10
15. Religious or cultural conflicts.....	10
16. Complaints	10
17. Application (response time).....	10
18. Appeal:	11
19. Records.....	11
20. Linked policies and Procedures:.....	11
21. Useful Contacts:	11
Appendix 1 – Application Process	12

1. Introduction

Italia Conti is committed to ensuring that all its students and staff have as equitable an academic/working experience as possible and, therefore, endeavours to work with disabled students and staff to support them.

Some disabled staff, students and visitors may need to use a trained Assistance Dog under the Equality Act 2010 and recognised Assistance Dogs **may** be a Reasonable Adjustment **provided the conditions outlined in this Policy are satisfied.**

In partnership with the Well-Being Team and Student Support Team, and in line with the Equality Act 2010, the Well-Being Team will work with disabled students to identify support needs and make Reasonable Adjustments in order to provide a safe and welcoming environment, in which access to study facilities and student programmes and services is equal for all.

2. Policy scope

This Policy applies to students, staff and visitors.

This guidance is for recognised Assistance Dogs only. We **do not usually accept** support animals that are not Assistance Dogs as defined in the Equality Act 2010.

Given the performing arts nature of the programmes offered by Italia Conti, animals can create an impediment to learning performing arts training necessarily imposes significant constraints on the use of animals by staff, students and visitors. Italia Conti provides training in musical theatre, dance and acting in which students are physically active and this environment in particular can be stressful even for highly trained animals. Typically only Assistance Dogs as defined by the Equality Act 2010 will be permitted under this Policy.

Italia Conti recognises that there may be very limited, exceptional circumstances where the use of a support animal other than an Assistance Dog may need to be considered. Such consideration will be made on a case-by-case basis in accordance with this Policy and on receipt of appropriate evidence of need, which may include professional medical advice. It will also need to be demonstrated that the animal has been trained to a sufficiently high standard and able to cope with the intensive physical learning environment at Italia Conti.

Animals **should not** be brought onto the Premises without permission or legitimate operational reason. Such reasons include:

- animals invited to an organised student wellbeing activity approved by Student Support and/or Wellbeing Team(s);
- working animals that are required to perform a specific role, in that location (e.g. police dogs, search dogs); and
- Assistance Dogs providing specific support to their handlers and approved under this Policy.

Any animals allowed access to the Premises must have been appropriately risk assessed (where practical) and approved by senior management and/or the Well-Being Team.

It is expected that Assistance Animals approved under this policy will typically be assistance dogs trained by a member organisation of Assistance Dogs UK.

Currently **only Assistance Dogs are expressly recognised** under the Equality Act 2010. Emotional support and therapy animals, and assistance animals other than dogs, are **not** and therefore do not have the same access rights as Assistance Dogs.

3. Definitions

For the purpose of this Policy, the following definitions are applied:

Assistance Dog: an Assistance Dog as defined by the Equality Act 2010 is

- “(a) a dog which has been trained to guide a blind person;*
- (b) a dog which has been trained to assist a deaf person;*
- (c) a dog which has been trained by a prescribed charity to assist a disabled person who has a disability that consists of epilepsy or otherwise affects the person's mobility, manual dexterity, physical co-ordination or ability to lift, carry or otherwise move everyday objects;*
- (d) a dog of a prescribed category which has been trained to assist a disabled person who has a disability (other than one falling within paragraph (c)) of a prescribed kind”*

It is Italia Conti's preference that Assistance Dogs have been trained by an organisation that is a member of Assistance Dogs UK (“ADUK”). A list of ADUK member can be found at: <https://www.assistancedogs.org.uk/about-aduk>. Italia Conti recognises that Assistance Dogs may be trained by other organisations or charities or even owner-trained, however Assistance Dogs trained through these alternative channels must be trained to the same high standards as Assistance Dogs trained by ADUK members.

A pet or a therapy/emotional support animal is not an Assistance Dog.

Pets and companion animals are not allowed on the Premises.

Assistance Dog User: the person who is using and is responsible for the Assistance Dog on the Premises. This **might not** be the same person who is the legal owner of the Assistance Dog. The Assistance Dog User may be required to provide medical evidence of their condition which the Assistance Dog is supporting.

Premises: this normally refers to Italia Conti's main site at 47 Church Street West, Woking, Surrey, GU21 6BQ. If the Assistance Dog User is required to attend an external venue which is not controlled by Italia Conti, the Assistance Dog User must comply with the policies and terms and conditions required by that site.

Reasonable adjustments: where Italia Conti's provisions, criteria or practises put a disabled person at a substantial disadvantage in comparison to persons who are not disabled, Italia Conti will take such steps as is reasonable for it to take to avoid the substantial disadvantage. Whether an adjustment is reasonable will be decided on a **case-by-case** basis.

Stakeholder(s): any individual or group of individuals who may be affected by the provision of an Assistance Dog, this may include teachers, the Assistance Dog User's peers, teaching staff, support staff, etc.

4. Requests for permission to use an Assistance Dog

Requests for permission for the use of an Assistance Dog is made on a **case-by-case** basis. For students, a request to use an Assistance Dog should normally be made at the point of a student's application, and agreed in principle, **before** they accept the offer of a place.

As set out in our Terms & Conditions, Italia Conti is committed to providing an inclusive and accessible environment and makes Reasonable Adjustments to accommodate individual needs. Notification of disability requiring use of an Assistance Dog early in the recruitment process enables Italia Conti to engage with Assistance Dog Users and discuss their support needs more effectively. All offers are conditional upon Italia Conti being able to implement the specific reasonable adjustments needed for students to complete their programme. Italia Conti is more likely to be able to implement such adjustments in a prompt and timely fashion if notified of any disability early in the recruitment process and Assistance Dog Users engage in any necessary discussions or health assessments as required.

Assistance Dog Users should submit a written application at the **earliest opportunity** to our Well-Being Team in accordance with the procedure laid out in **Appendix 1**.

Please note: making an application **does not** automatically guarantee that the request will be approved.

5. Characteristics of an Assistance Dog

For the purpose of this Policy, an Assistance Dog will demonstrate the following characteristics:

- does not wander freely around the Premises;
- sits or lies quietly on the floor next to their Assistance Dog User (or is able to sit quietly at the side of a studio/classroom whilst its Assistance Dog User takes part in activities by themselves or with others);
- is unlikely to foul in a public place;
- does not cause a nuisance to other users.

6. Responsibilities of the Italia Conti community

Assistance Dogs are not pets, and members of the Italia Conti community should **not**:

- feed, pet or praise Assistance Dogs;
- distract or startle an Assistance Dog; or
- interfere with the Assistance Dog's service.

Failure to abide by these requirements will constitute a breach of the *Student or Staff Code of Conduct* and may result in disciplinary action.

7. Organisational and Physical Arrangements

Italia Conti offers the following arrangements to ensure a safe and inclusive environment for Assistance Dogs, their Assistance Dog Users, and other members of the residential and campus community:

- a. support and advisory services from the Italia Conti's Well-Being and Student Support Teams in conjunction with Italia Conti's Health & Safety Team;
- b. a mutually agreed *Assistance Dog Plan* that sets out any Reasonable Adjustments required;
- c. pre-entry information visit to assess potential works to the site;
- d. arrival or pre-arrival site orientation;
- e. visits by the Assistance Dog's trainer are encouraged in the early settling-in days, and then annually thereafter;
- f. an Assistance Dog's route safety check (for hazards and obstructions) including studios, recording studios, student hub, gymnasium, offices and the theatre area;
- g. the issue of Assistance Dog guidelines for staff and students;
- h. identification of designated relief area/s for the toilet needs of Assistance Dogs either on the Premises or off-site;
- i. within rooms and enclosed spaces on the Premises, to ensure there is sufficient space for Assistance Dogs within reach of Assistance Dog User (e.g., under a table or in a corner);
- j. setting out processes and procedures for adverse incidents in relation to the presence or admittance of Assistance Dogs, such as allergies, fear of animal presence, religious objections, and animal misbehaviour;
- k. setting out processes and procedures for the care and handling of Assistance Dogs and their Assistance Dog Users in emergency situations.

8. Supporting the use of an Assistance Dog

Once an application for the use of an Assistance Dog has been granted, the Well-Being Team will work with the Assistance Dog User and other Stakeholders to ensure that the provisions of the *Assistance Dog Plan* (including any Reasonable Adjustments) are being met. This is to ensure that the Assistance Dog User can access the Premises and Italia Conti activities in accordance with the conditions agreed.

9. Roles and Responsibilities (Italia Conti)

a) Compliance, Awareness and Training

The Well-Being Team will take reasonable steps to ensure that staff are provided with adequate training to respond to the needs of the Assistance Dog and the Assistance Dog User.

The Well-Being Team to ensure that practice is conformable to current legislation.

b) Notification

The Well-Being Team will provide prior notice to staff, students and other Stakeholders working in close proximity to the Assistance Dog.

c) Infrastructure

The Welfare Team will co-ordinate the identification and, if necessary, installation of appropriate relief areas such as spending pens.

The Premises caretaker will manage the upkeep of spending pens, including the regular provision of refuse bins.

The Premises caretaker will ensure access routes are clear and easy to navigate and obstructions removed or are identified as a potential hazard.

d) Emergency Evacuation

Italia Conti will set out a safe and suitable emergency evacuation plan for Assistance Dogs and their Assistance Dog Users.

Fire Marshal(s) will brief Assistance Dog Users on emergency evacuation procedures, and ensure a Personal Emergency Evacuation Plan (“PEEP”) is in place.

The Well-Being Team will ensure that information on emergency evacuation is available for reference in accessible formats.

The Well-Being Team will ensure that emergency responders are trained to make reasonable efforts to keep Assistance Dogs with their Assistance Dog Users safe in the event of an emergency situation. However, the emergency responder’s priority should be toward the safety of the Assistance Dog User.

e) Orientation

The Wellbeing Team will conduct pre-arrival and arrival site orientation and will organise guided assistance in the event of route variations, relocation, or when access to specific areas is restricted.

10. Assistance Dog Users' Responsibilities

a) Requesting permission

Assistance Dog Users must notify Italia Conti as early as possible in the admissions process if they have a disability which requires use of an Assistance Dog. This must be done as soon as possible as offers are condition upon Italia Conti being able to implement the specific Reasonable Adjustments needed for students to complete their programme. This must be done in accordance with the procedure outlined in **Appendix 1**. All requests will be considered on a case-by-case basis.

If the Assistance Dog has been trained by an organisation that is a member of ADUK, the Assistance Dog User **must** be able to provide **a certificate and ID** from the training organisation.

If the Assistance Dog has been trained by an organisation that is not a member of ADUK, or has been owner-trained, the Assistance Dog User **must** be able to demonstrate that the Assistance Dog is fully trained to the appropriate standard expected of an Assistance Dog under the Equality Act 2010.

Italia Conti must be satisfied that the presence of the Assistance Dog will not pose a risk to the health and safety of the Assistance Dog User, the Assistance Dog or other Stakeholders or cause major disruptions to the learning environment.

b) Terms and conditions

If permission is given for the Assistance Dog to be used on site, the Assistance Dog User will comply with any terms and conditions specified in this Policy and/or the *Assistance Dog Plan*.

If the Assistance Dog User is required to attend an external venue which is not controlled by Italia Conti, e.g., the Rhoda McGaw or Buzz Theatres, the Assistance Dog User must comply with the policies and terms and conditions required by that site. This may involve checks before permission might be granted, and it is not guaranteed that such permission might be given by an external venue. Italia Conti will provide all reasonable support to Assistance Dog Users who are required to attend external venues as part of their programme of study or employment duties to ensure that those venues are accessible for the Assistance Dog.

c) Legitimate reason and function

Assistance Dog Users must be able to provide proof of a legitimate reason for using an Assistance Dog. This will typically be evidence of a medical condition that requires this support. They should be able to provide information about the animal and its tasks/duties, when requested by college staff.

d) Identification

Assistance Dog Users must ensure that their Assistance Dogs are clearly identifiable by the use of special collars and/or harnesses when on duty.

e) Insurance

Assistance Dog Users are responsible for ensuring that their Assistance Dogs are covered by the appropriate full public liability insurance and provide the original insurance document(s) to the College so that a copy can be kept for our records. It is the responsibility of the Assistance Dog user to ensure that the Assistance Dog has the correct insurance at all times when it is being used on the Premises, including external sites such as theatres, rehearsal studios, etc.

f) Access restrictions

Assistance Dog Users must respect access restrictions established by the institution on grounds of health and safety. Assistance Dog Users must ensure that Assistance Dogs only access the area(s) that they have been given permission for.

g) Animal misbehaviour

Preventing and correcting Assistance Dog's misbehaviour is the Assistance Dog User's responsibility. Assistance Dog Users must make sure that their Assistance Dog does not cause harm or injury to others or cause damage to Italia Conti property or the property of others.

h) Cleanliness

Registered blind Assistance Dog Users are not required to clean up after their Assistance Dogs. Assistance Dogs are expected to have received the appropriate training to avoid animal waste on campus. Assistance Dog Users share responsibility for the clean-up of their Assistant Dog's waste, consistent with reasonable capacity.

Assistance Dog Users must ensure their Assistance Dogs use designated areas identified by the institution for toileting. This may require the Assistance Dog User to take the Assistance Dog off the Italia Conti site. In the event that the animal does foul whilst on the Premises, the Assistance Dog User must report this to an appropriate staff member to make arrangements for the Premises caretaker to clean and sanitize the area.

i) Animal care and supervision

Animal care is the Assistance Dog User's responsibility. The Assistance Dog User must ensure regular health checks, vaccination, adequate standard of grooming, and the supply of food and drink at all times. Assistance Dog Users must ensure that their Assistance Dog does not introduce parasites to the Premises and may be liable for any costs in dealing with any resulting infestation should such an incident occur.

Assistance Dog Users must ensure that Assistance Dogs are kept on a lead at all times when walking around the Premises or safely harnessed when unsupervised for short periods of time.

Assistance Dog Users must ensure the Assistance Dog has its requirements in relation to toileting and feeding met.

Assistance Dog Users of Assistance Dogs that are ill, in poor health, excessively unclean or unkempt may be required to remove the Assistance Dog from the Premises.

Italia Conti is not responsible for the loss, ill health, or death of the Assistance Dog, except in the case of Italia Conti's negligence.

j) Improvements

Italia Conti is happy to listen to the suggestions of Assistance Dog Users as to how provision for Assistance Dogs may be improved.

k) Animal training

It is anticipated that Assistance Dogs undergo intensive training before commencing duty. They should also receive further training throughout their working lives, especially in the event of change in work location or work pattern. Assistance Dog Users are responsible for the training needs of their Assistance Dogs, for the correct and safe performance of their duties. A copy of the relevant certification should be provided to Italia Conti.

11. Conflict Situations - Removal of Assistance Dogs

Italia Conti reserves the right to remove or bar entry to an Assistance Dog when it poses a direct threat to the health and safety of others. Unresolved animal misbehaviour may also provide grounds for removal, after all reasonable measures have been taken to address this.

Removal of an Assistance Dog may also be required if there is a specific warning given by the authorities of any disease which may be spread by the Assistance Dog on-site.

12. Damage/distress

Assistance Dog Users are responsible for any damage and/or distress caused by the Assistance Dog to persons or property.

13. Restricted access

The institution may restrict access of Assistance Dogs to certain areas for health and safety reasons. Applications for exceptions will be reviewed on a case-by-case basis

14. Conflicting disabilities

Where an Assistance Dog poses adverse health risk to an/other student/s, Italia Conti will seek medical documentation from the affected party/parties to determine suitable alternative arrangements for either or both parties.

15. Religious or cultural conflicts

Religious or cultural beliefs **cannot** be used to prohibit access to Assistance Dogs and their Assistance Dog Users.

16. Complaints

Any issues in relation to Assistance Dogs on the Premises that cannot be resolved informally should be raised in accordance with Italia Conti's *Complaints Policy and Procedure*.

17. Application (response time)

A decision on the use of an Assistance Dog should be normally considered within three months of the written application being received.

18. Appeal:

Should the student be unsuccessful in their application, (or have their permission to use an Assistance Dog subsequently withdrawn), a right of appeal is available by following the Italia Conti *Complaints Policy and Procedure*.

19. Records

The Well-Being Team will maintain a central record of the Assistance Dog Users and their Assistance Dogs and will ensure that the relevant teaching and non-teaching staff (including Security, Fire Marshals and Duty Managers) are informed.

20. Linked policies and Procedures:

Accessibility Plan

Admissions Policy

ALS Policy

Complaints Policy and Procedure

Data Protection Policy

Disability Policy (HE)

Disclosure Policy and Procedure for Degree students and Diploma students over 18

Emergency Actions Plan Policy

Equal Opportunities Policy

Fire Alarm and Emergency Evacuations Procedure

Fire Safety Policy

First Aid Needs Assessment

Health and Safety Policy

Production and Performance Policy

Safeguarding Policy

SEND Policy (FE)

Staff Code of Conduct

Student Code of Conduct

21. Useful Contacts:

Guide Animals:

www.guideanimals.org.uk

guideanimals@guideanimals.org.uk

0845 241 2178

Assistance Animals UK

www.assistanceanimals.org.uk

01844 348 100

Canine Partners

www.caninepartners.co.uk

The Royal National Institute of Blind People

www.rnib.org.uk

0303 123 999

info@caninepartners.co.uk

08456 580 480

Animals for the Disabled

www.animalsforthe-disabled.org

info@animalsforthe-disabled.org

08700 776 600

Hearing Animals for Deaf People

www.hearing-animals.co.uk

info@hearinganimals.org.uk

Appendix 1 – Application Process

Stage One: written request

1) The Assistance Dog User must apply for formal permission to use the Assistance Dog. This must be done in writing to the Well-Being Team, i.e., a letter or email. *For students, a request to use an Assistance Dog should normally be made at the point of their application.*

*Please note: making an application **does not** automatically guarantee that the request will be approved.*

2) The written request should clearly indicate the following:

- the Assistance Dog User's name, contact details and course applied for (including the academic year of entry and, where possible, the student reference number, UEL & UCAS reference numbers (HE applicants));
- official confirmation of the medical condition that the Assistance Dog is providing support for;
- evidence that the Assistance Dog has been trained by a member of ADUK or trained to equivalent standard and will not pose a risk to the health and safety of the Assistance Dog User, the Assistance Dog or other Stakeholders or cause major disruptions to the learning environment;
- a description of how the Assistance Dog is intended to support the Assistance Dog User whilst at Italia Conti.
- the date that the request is being made.

3) A declaration by the Assistance Dog User that their responsibilities as outlined in **Section 10** of this Policy will be met.

Stage Two: processing the request and making a decision

Upon receipt of this written application the Well-Being Team will:

1) Undertake an appropriate **fact-find** to review the types of activities that the Assistance Dog User may be engaged in, e.g., class/studio/rehearsal/performance spaces. (The fact-find will also take into account information provided by the teaching team and/or other stakeholders on the suitability/practicality of an Assistance Dog).

Where practical, all relevant Stakeholders (i.e. co-workers, classmates, etc.) will be consulted.

2) **Review the responses** from Stakeholders to determine if there is a **prima facie case** for permitting the use of an Assistance Dog.

In determining a prima facie case, the Well-Being team will base their decision on:

- the Assistance Dog User's rights under the Equality Act 2010;
- the reasonableness (or otherwise) of making adjustments to permit the use of an Assistance Dog;
- whether the provision of an Assistance Dog would create a significant disadvantage for other students;
- whether the Assistance Dog would present an impediment to the provision of performing arts training as performing arts training necessarily imposes significant constraints on the use of animals by staff, students and visitors.
- relevant health and safety considerations.

If there is **no prima facie case**, the request will be unsuccessful, and the Assistance Dog User will be notified in writing.

3) **If there is a prima facie case** for permitting the use of an Assistance Dog, the Well-Being Team, in conjunction with other stakeholders (as appropriate), will draw up and agree an **Assistance Dog Plan**.

In drawing up the *Assistance Dog Plan* details will be given of the relevant factors, including any reasonable adjustments or condition, under which the use of an Assistance Dog has been agreed. It will also contain a reference to the responsibilities of Italia Conti (**Section 9**) and the responsibilities of the Assistance Dog Owner (**Section 10**).

The *Assistance Dog Plan* will also set out any processes and procedures for adverse incidents in relation to the presence or admittance of Assistance Dogs, such as allergies, fear / phobia of animal presence, religious objections, and animal misbehaviour.

The *Assistance Dog Plan* should be signed and dated by both the Assistance Dog User and the Safeguarding and Well-Being Lead to confirm that the conditions have been understood and agreed.

The *Assistance Dog Plan* will also include:

- a) a **Health and Safety Risk Assessment** to cover the activities that the Assistance Dog may be used for;
- b) a **PEEP** this should set out the processes and procedures for the care and handling of Assistance Dogs and their Assistance Dog Users in emergency situations.
- c) Guidance to be supplied to all concerned parties (co-workers, classmates, etc.) on safe practice and appropriate behaviour in advance of the Assistance Dog coming into classes.

Note: the permission to use an Assistance Dog may be withdrawn under Section 11 of this Policy.

END