

Animals on Campus Policy

Written/Revised: August 2023

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Date of Review: August 2025

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1 Scope of the policy

This policy applies to all staff, students, visitors and contractors and to all RCS campuses, buildings, vehicles, grounds and residences.

RCS recognises that there may, on occasions, be a desire, or requirement, for animals to be present within the University. RCS recognises that some people rely on an assistance animal for support with physical tasks and is fully committed to allowing open access for such animals except where there is a genuine security or safety risk or concern for the animal's welfare.

2 Assistance Dogs

For the purposes of this policy, an Assistance Dog is one which has been specifically trained to assist disabled people and which has been qualified by one of the organisations registered as a member of Assistance Dogs (UK) or an equivalent organisation in another country. Assistance Dogs (UK) is a coalition of Assistance Dog organisations, individual members of which are listed below.

RCS requires Assistance Dog owners (Owners) to be in a position to evidence that their dogs are certificated Assistance Dogs, and the dogs are required to have:

- A formal identification in the form of branded jackets or lead slips
- A yellow ID booklet from the Assistance Dogs (UK) member organisation

All of this evidence may not be available when members of the public visit the building so reasonable adjustments must be made by staff by allowing access.

If **staff or students** have qualified to be partnered with an assistance dog trained by an Assistance Dogs (UK) member, they will have had to show clear evidence of their disability by means of medical assessments and reports.

There are eight registered charities that form Assistance Dogs (UK). These are:

- 1. Canine Partners
- 2. Dog A.I.D. (Assistance in Disability) *
- 3. Dogs for Good
- 4. The Guide Dogs for the Blind Association
- 5. The Seeing Dogs Alliance
- 6. Hearing Dogs for Deaf People
- 7. Medical Detection Dogs
- 8. Support Dogs
- 9. Autism Dogs Charity
- 10. Service Dogs UK
- 11. Veterans with Dogs

Assistance Dogs have formal identification and are permitted to accompany their owners at all times and in all places within the UK (unless there is a genuine health and safety risk.)

Please note that Assistance Dogs are highly trained working dogs, performing tasks to assist disabled people. Members of the RCS community should not:

- Touch or feed an Assistance Dog, unless invited to do so by the Owner.
- Deliberately distract or startle an Assistance Dog or separate or attempt to separate an Assistance Dog from the Owner.

^{*}Please note Section 6.7 below

RCS regards it as incumbent on the owner of an animal that is not a registered assistance dog to demonstrate that it is fulfilling a legitimate and essential support need for the individual comparable to that of a guide dog, hearing dog or medical alert dog. Where such a need can be shown, comparable access rights will normally be allowed. A key test will be whether the owner has a physical need for the animal to be present to perform some necessary function.

3 Emotional Support / Therapy Animals

At present, emotional support animals are not formally classed as assistance animals, although RCS does recognise that there is considerable national debate on their future status. At present, our policy is that we do not regard emotional support or therapy animals as assistance animals and so they do not enjoy the same legal right of access. But we do recognise that an emotional support animal can have benefits for people with disabilities and we will support reasonable adjustments in line with the Equality Act 2010.

Such animals will generally not be allowed within communal areas of RCS buildings other than in very limited circumstances and where the need for this is supported by evidence of a medical need. Communal areas include venues, café bar and the library. When present in communal areas, dogs should be kept on a lead, as a courtesy to other building users who may be nervous of animals. Students who feel that they require access for a support animal should discuss their situation confidentially with the Disability Advisor who can conduct a needs assessment and, if appropriate, advise on provision of suitable medical evidence. Staff should approach their line manager and may also discuss their situation confidentially with their HR contact and should be prepared to provide evidence in support of their case, normally via HR.

RCS regards it as incumbent on the owner of an animal that is not a registered assistance dog to demonstrate that it is fulfilling a legitimate and essential support need for the individual comparable to that of a guide dog, hearing dog or medical alert dog. Where such a need can be shown, comparable access rights will normally be allowed. A key test will be whether the owner has a physical need for the animal to be present to perform some necessary function.

4 Companion animals

RCS recognises that companion animals often provide great support and comfort to many people and is sympathetic to this. However, it is important to balance that against the right of other campus users to work and study in an environment that they find comfortable, 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 working environment. In some cases, animals may be disruptive either in normal circumstances or, potentially, in an emergency.

The default position is therefore that companion animals should not be brought into RCS unless there are demonstrably good reasons for this. This will generally mean that that animal must be fulfilling some recognised and demonstrable assistance or support role as indicated in the previous sections. RCS regards it as incumbent on the owner of an animal to demonstrate that it is fulfilling a legitimate and essential support need for the individual comparable to that of a guide dog, hearing dog or medical alert dog. Where such a need can

be shown, comparable access rights will normally be allowed. A key test will be whether the owner has a physical need for the animal to be present to perform some necessary function.

5 Administration Process

Staff and students must complete the application form (Appendix 2) to bring an assistance dog or emotional support animal on campus on a day-to-day basis as well as providing the supporting information required. Student applications will be considered by the appropriate Director, the Academic Registrar and the HSW Manager while staff applications will be considered by the Director of HR and the HSW Manager.

All evidence of certification should be collated by **Academic Administration and Support** *I* **Human Resources** and passed to the **RCS Health, Safety and Wellbeing Department** prior to the student commencing their studies at RCS or the member of staff bringing an Assistance Dog to work. Acceptance to study, or to work, will not be given until this process has been completed. Final approval is the responsibility of the relevant Director for students or the Director of HR for staff.

As assistance dogs and emotional support animals are not provided for some disabilities staff and students will be requested to provide information about the health issue and how it amounts to a disability such that they are substantially adversely affected in their ability to carry out normal day to day activities. This will require a letter from a GP or Occupational Health professional clearly outlining the health issue and explaining the purpose of the Assistance Dog, linked to the Owner's disability and how the provision of a dog or animal reduces or eliminates the substantial disadvantage.

6 Assistance Dogs and Emotional Support Animals on RCS premises

Assistance Dogs and Emotional Support Animals are permitted to access all RCS premises under the control of the Owner (or where necessary in order to control the animal, for a short period of time someone other than the Owner). The Owner may be a student, a member of staff or a visitor.

A risk assessment must be undertaken by the relevant Line Manager / Head of Department / Head of Programme for each instance of an Assistance Dog and Emotional Support Animal accompanying a student into classes or a member of staff at work. As a performing arts institute some areas may not be suitable for animals due to noise, physical activity or space restrictions. The RCS Health and Safety Department can assist and advise on the risk assessment, which ultimately is the responsibility of the Head of Department / Head of Programme (exemplar attached – Appendix 3).

When Assistance Dogs and Emotional Support Animals are on RCS premises, the Owners must comply with the following guidelines:

6.1 Identification and information

Owners must ensure that their Assistance Dogs are clearly identifiable by the use of special collars, harnesses and/or ID tags when on duty. Owners shall provide information about the Assistance Dog and its tasks/duties if reasonably requested by RCS staff.

6.2 Insurance

Owners are responsible for ensuring that their Assistance Dog and Emotional Support Animal is covered by full liability insurance that covers their role as an Assistance Dog or Emotional Support Animal. This should be specified in the policy documentation.

6.3 Access restrictions

Owners must respect general access restrictions established by the RCS such as to plant rooms or kitchens. Owners must ensure that Assistance Dogs or Emotional Support Animals do not enter staff and students' privately assigned spaces, such as bedrooms or flats within residences, without permission from the individual and the landlord.

6.4 Animal misbehaviour

Preventing and correcting an Assistance Dog's or Emotional Support Animal's misbehaviour is the Owner's responsibility. Owners must make sure that their Assistance Dog or Emotional Support Animals does not cause harm or injury to others, damage to property or is disruptive to the activities of the Conservatoire. Good behaviour is a strict condition of access and failure to meet this condition may result in access being denied.

6.5 Cleanliness

Registered blind people are not required to clean up after their Assistance Dogs. Owners must take responsibility for the clean-up of the animal's waste, consistent with reasonable capacity. Owners shall use reasonable endeavours to use designated spending (toileting) areas as identified by the RCS Estates Team. If you are a visitor to RCS, please contact the relevant reception desk and Client Services will advise accordingly.

For the Renfrew Street Campus, a suitable area has been identified that is accessible from Hope Street Lane. Client Services can advise on the location.

In the unlikely event that an Assistance Dog does spend out with the designated areas, the Owner must report this to Client Services, who will make arrangements for the area to be cleaned and sanitised.

6.6 Animal care and supervision

Animal care is primarily the Owner's responsibility. Owners must ensure that their animal has its requirements fully met in relation to feeding, watering and spending (toileting).

Owners must ensure that Assistance Dogs are kept on the lead at all times when walking round RCS or are safely restrained when unsupervised for short periods of time. In order to support Owners who are students or staff, RCS provides spending (toileting) facilities in an appropriate location off Hope Street Lane (Renfrew Street Campus).

Emotional Support Animal must be kept under the control of the owner at all times and not allowed to roam freely in any spaces.

RCS does not support or condone animals being left in cars on campus. However, if owners do choose to do this, appropriate animal welfare standards must be in place. Dogs should not be left tethered unattended outside buildings.

6.7 Animal training

Owners are responsible for any additional training for their Assistance Dogs and for the correct and safe performance of their duties.

Assistance Dogs from Dog A.I.D may, in exceptional circumstances, be in on-going training due to the different structure of this particular organisation. In such cases, permission for the Owner to bring the Assistance Dog into RCS will be subject to a risk assessment and stringent conditions regarding the Assistance Dog's behaviour on campus. (See Exceptions below).

6.8 Damage

Owners are responsible for any damage to persons or RCS property.

6.9 Conflicting disabilities

Where an Assistance Dog or Emotional Support Animal poses an adverse health risk to students or staff, RCS will seek medical documentation from the affected party/parties to determine suitable alternative and equitable arrangements for either or both parties.

6.10 Religious or cultural conflicts

Religious or cultural conflicts cannot be used to prohibit access to Assistance Dogs and their Owners.

6.11 Complaints

Any issues in relation to Assistance Dogs or Emotional Support Animals on RCS premises that cannot be resolved informally should be raised in accordance with the RCS complaints handling procedure.

7 Exceptions

Exceptions to this policy may be granted for certain organised events such as Therapets, visits from Guide Dogs or learning/teaching events. Such exceptions will only be considered following a written request, evidence of insurance and risk assessment being submitted to the RCS Academic Registrar two weeks prior to the event.

Exceptions to this policy, for staff and students, will only be considered subject to a risk assessment, submission of relevant insurance and approval from the relevant Director for students or the Director of HR for staff.

8 Monitoring and review

This policy will be reviewed as necessary due to changes in legislation, standards or sector good practice.

9 Reference Documents

Assistance Dogs - a guide for all businesses

A guide for welcoming customers with assistance dogs

10 Appendix 1 - Exemplar

A Production student (Emily) informs the Disability Adviser (CDA) that she will bring her assistance dog on course with her. The AAS office gives Emily a copy of the RCS Animals on Campus policy and asks Emily to complete and return the application form along with the evidence and insurance documents (page 1 of this Policy).

The completed application form will be considered by the appropriate Director. If the application is approved the Director informs Emily's Head of Programme (HoP) about the assistance dog and the HoP arranges to meet with Emily and the assistance dog to carry out a risk assessment, with support from the Health, Safety and Wellbeing Manager. The risk assessment is completed to the satisfaction of the HoP and Emily. Emily and her assistance dog start on the course at RCS.

If the risk assessment had prompted concerns for the HoP and the Health, Safety and Wellbeing Manager, the student would be informed of these concerns. If the HoP and the Health, Safety and Wellbeing Manager felt there was no way of resolving the concerns (e.g. there would be danger to other students or staff) then the appropriate Director would be informed that the assistance dog could not be accepted onto RCS premises. The Director would inform the student. The student could appeal this decision to the Assistant Principal.

11 Appendix 2 – Application Form || | Animals on Campus Application Form

Royal Conservatoire of Scotland

Nature of Application (plea	se tick):		
Assistance Dogs			
Therapets			
Emotional Support Anima			
Other (Please specify)			
Other (Ficase speelify)	ы		
Applicant:			
Name:			
Department:			
Email:			
Animal Type:			
Animals Name:			
Information required and p tick):	rovided before an app	olication can be ap	proved (please
Copy of yellow ID booklet	from Assistance Dogs ((UK)	
Copy of Public Liability Ins	surance Certificate		П
(This must specify the role		tance dod Emotion	_
organisation for Therapets	_	tarioc dog, Emotioni	ar oupport / triimar or
Medical Support Informati	on / Letter:		
(This will outline the health adversely affects normal of		•	-
Risk Assessment for Ther	apets		
I confirm that I have read and by the Policy and any conditi		=	•
Signature:		Date:	
RCS Administration:			
All information received			
Application approved / declin	ed		
Signature:		Date:	
(Director - for Assistance Do	gs / Academic Registrar	for Therapets)	

We take your privacy very seriously. Please find a copy of our Privacy Notice at: www.rcs.ac.uk/policy/privacy

12 Appendix 3 - Exemplar of risk assessment

RISK ASSESSMENT FORM (HSWF001)

TASK/ACTIVITY/AREA:		Ref.	INITIAL ASSESSMENT DATE:
Assistance d	OG ACCOMPANYING XXXXXXXX		
SITE/LOCATION:	DEPARTMENT:	SUPERVISOR:	LAST ASSESSMENT DATE:
Assessor:	REVIEWED BY:	APPROVED BY:	

It is important you discuss your assessment and proposed actions with staff, students or their representatives. RI should be low.

You should review your risk assessment if you think it might no longer be valid, e.g. following an accident in the workplace, or if there are any significant changes to the hazards in your workplace, such as new equipment or work activities.

RI=RISK INDEX C=CONSEQUENCE / SEVERITY L=LIKELIHOOD

[REFER TO GUIDANCE NOTES OVERLEAF]

HAZARD-CONSEQUENCES (SOMETHING WITH THE	PERSONS AT RISK:	EXISTING CONTROL MEASURES	RI wi	th con	trol m	easures	Additional Controls
POTENTIAL TO CAUSE HARM AND THE RISKS / EFFECT OF THAT HARM)	Employees / Visitors / Contractors / Public		C/S	L	RI = Cx L	LOW MED HIGH	IF REQUIRED TO REDUCE THE RI TO LOW
General behaviour of the dog. Employees and other students may have a fear of dogs. It is possible that the dog's behaviour may not be appropriate - dog may bark, jump up on people, be more active in public areas or class activities than would normally be expected of an	Employees and other students; in certain conditions: visitors, contractors and the public.	 The member of staff is responsible for the behaviour of the dog. The RCS Animals on Campus policy states that assistance dogs are permitted to access RCS premises under the control of the owner. Owners are responsible for ensuring that the assistance dog is covered by full liability insurance that covers the role of the dog. Preventing and correcting the dog's misbehaviour is the owner's responsibility. Owners are responsible for the training of their assistance dogs, and for the correct and safe performance of their duties. 	3	3	9	Med	The following must be confirmed as being in place: Details of the liability insurance cover. Formal identification in the form of branded jackets or lead slips Yellow ID booklet from the Assistance Dogs

HAZARD-CONSEQUENCES PERSONS AT (SOMETHING WITH THE RISK:		EXISTING CONTROL MEASURES		th con	trol m	easures	Additional Controls
POTENTIAL TO CAUSE HARM AND THE RISKS / EFFECT OF THAT HARM)	Employees / Visitors / Contractors / Public			L	RI = Cx L	LOW MED HIGH	IF REQUIRED TO REDUCE THE RI TO LOW
Assistance Dog. Poor behaviour in the café may lead to hot drink spills / burns or trip hazard.		If anyone raises concerns about fear of dogs, then appropriate additional controls will be considered such as room allocation and group allocation.					(UK) member organisation.
Dog in a workshop / teaching space. Disruption of activity by dog. Dog at risk from activity, space, noise etc. Students / staff at risk from less space.	Employees and students.	 The member of staff will be responsible for the behaviour of the dog. Preventing and correcting the dog's misbehaviour is the owner's responsibility. Owners are responsible for the training of their assistance dogs, and for the correct and safe performance of their duties. The dog must settle in all work situations and not be disruptive. This must be part of the agreement of entry to RCS. The dog must be located in a safe space that doesn't compromise space or the activity taking place. 	1	2	2	Low	
Risk to the welfare of the assisted member of staff / student when the dog is not able to be in the same room due to noise or restricted space. Associated risk to employee and other student welfare if dog should react adversely to sudden changes	Employees and other students; in certain conditions: visitors, contractors and the public.	 Preventing and correcting the dog's misbehaviour is the owner's responsibility. Owners are responsible for the training of their assistance dogs, and for the correct and safe performance of their duties. 	1	2	2	Low	

HAZARD-CONSEQUENCES (SOMETHING WITH THE	PERSONS AT RISK:	EXISTING CONTROL MEASURES		th con	trol m	easures	Additional Controls
POTENTIAL TO CAUSE HARM AND THE RISKS / EFFECT OF THAT HARM)	Employees / Visitors / Contractors / Public		C/S	L	RI = Cx L	LOW MED HIGH	IF REQUIRED TO REDUCE THE RI TO LOW
in volume (e.g. a chorus and orchestra situation) or because of restricted space.							
Risk to employees and other students due to the dog being unsupervised when on-site.	Employees and other students.	 Assistance dogs are permitted to be under the control of a person other than the owner for a short time when on RCS premises. Owners must respect general access restrictions, e.g. plant rooms and kitchens. 	1	2	2	Low	
Physical and medical reactions to the dog by employees and other students, e.g. because of allergies.	Employees and other students.	 Where an assistance dog poses an adverse health risk to employees and other students, RCS will seek medical documentation to determine suitable alternative and equitable arrangements. 	3	2	6	Low	
Interference from employees and other students which distracts from the performance of the dog's tasks.	Employees and other students.	 The RCS Animals on Campus policy states that members of the RCS community should not engage in such interference, e.g. touching or feeding the dog. The dog should be clearly identifiable as an assistance dog by the use of special collars, harnesses, ID tags, etc. All staff and students have been informed about the presence of Assistance Dogs and to respect that they are working dogs. 	2	2	4	Low	
Issues relating to cleanliness.	Employees and other students.	 Owners must take responsibility for the clean-up of the dog's waste and must use reasonable endeavours to use designated toileting areas as identified by Estates. A suitable area has been identified that is accessible from Hope Street Lane. Where an 	3	2	6	Low	

HAZARD-CONSEQUENCES PERSONS AT (SOMETHING WITH THE RISK:		EXISTING CONTROL MEASURES		th con	trol m	easures	Additional Controls
POTENTIAL TO CAUSE HARM AND THE RISKS / EFFECT OF THAT HARM)	Employees / Visitors / Contractors / Public		C/S	L	RI = Cx L	LOW MED HIGH	IF REQUIRED TO REDUCE THE RI TO LOW
		assistance dog spends out with the designated areas, the owner must report this immediately to Client Services.					
Health of the dog – the dog could be in a work environment that is noisy which may have an effect on the dogs hearing or temperament.		 The student is responsible for the health and safety of the dog. The student must ensure that the dog is not exposed to unsafe conditions. The student must take advice from the relevant Assistance Dog organisation and/or their vet to ensure the health of the dog is not compromised. 					

13 Document Control Information

Document Control Overview

Author of Policy: Health, Safety and Wellbeing Manager

Accountability: Director of Human Resources

Department: Human Resources

Review requirements: Annual or as required by legislation.

Committee Requirements: Major changes must be approved by Staff Consultative

Forum.

Operational changes can be approved by the Director of Human Resources and noted at Staff Consultative

Forum.

Current Version: V2

Approval Confirmed (date): 23 August 2023

Approval Confirmed (signature): Health, Safety and Wellbeing Committee

Document Revision History

Version No.	Version Date	Prepared By	Approved By	Summary
0.2	13/11/19	J Balmforth / R Brown		New Policy
0.3	22/11/19	J Balmforth / R Brown		New Policy
0.4	20/01/20	R Brown		New Policy
2	23/08/23	R Brown	HSW Committee	Update to reflect emotional support animals and application process.
1				