



HOUSE OF COMMONS

Women and Equalities Committee

Oral evidence: Assistance Dogs, HC 719

Wednesday 22 May 2024

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Members present: Caroline Nokes (Chair); Elliot Colburn; Dame Jackie Doyle-Price; Carolyn Harris.

Questions 1-52

Witnesses

I: Isabelle Atkins, Communications Officer, Dogs for Good; Eleanor Briggs, Head of Policy, Public Affairs and Campaigns, Guide Dogs; Vicky Worthington, Executive Director, Assistance Dogs UK.



Examination of witnesses

Witnesses: Isabelle Atkins, Eleanor Briggs and Vicky Worthington.

Q1 Chair: Good afternoon and welcome to this afternoon's meeting of the Women and Equalities Committee on the piece of work we are doing on assistance dogs. I thank our witnesses for coming along today. We have Isabelle Atkins, communications officer for Dogs for Good, and Rumba; Vicky Worthington, executive director of Assistance Dogs UK; and Eleanor Briggs, head of policy, public affairs and campaigns at Guide Dogs.

For the ease of people watching in the Gallery or online, from left to right the members of the Committee present today are Elliot Colburn, Jackie Doyle-Price, me—Caroline Nokes—in the Chair, and Carolyn Harris on the far side of the room.

Committee members will ask you questions in turn. If at any point any of you wishes to come in on a question that was not specifically addressed to you, please feel free to indicate. Can I just check whether you are all comfortable with the Committee using your first names? I have nods all round—thank you.

We will start with questions from me on training and support. I will direct this to Vicky and then to Eleanor. How many people are using assistance dogs, and how many of them have been trained by an accredited organisation?

Vicky Worthington: When we last counted, which was 2023, we had over 7,000 people who had been partnered with an assistance dog. That is purely from our membership. We have 13 members that have been fully accredited. We also work with six organisations that are working towards accreditation. Outside of that, we do not have any figures on how many assistance dogs have been trained by individuals. We know there are roughly 20 to 30 other charities that specifically train assistance dogs that are not accredited, and four or five commercial ones. We are seeing more commercial organisations start up. There are just no accurate figures for a total, but that is it roughly from our membership.

Eleanor Briggs: I just want to start by saying that we are really grateful that you are having this session today and putting the spotlight on assistance dogs. It is such an important topic and they make such a difference for disabled people, so it is brilliant that we are discussing this.

In terms of numbers, prior to the covid-19 pandemic, Guide Dogs had nearly 5,000 partnerships, but, like a lot of assistance dog charities and other charities, covid caused a lot of problems for us. It meant that we had to disband our breeding programme and could not do training for a while. Also, crucially, it affected the socialisation of our puppies. You can imagine how difficult it was during a lockdown to train guide dogs to be around people and places. That did have an impact on our numbers. At the moment, we have around 3,300 partnerships, but we are going up. Our figures have gone up by 20% in 2023 from 2022, and we are



absolutely focusing on getting our numbers back up to pre-pandemic figures.

Q2 Chair: Vicky, you referenced increasing numbers of organisations training dogs and the number seeking accreditation, but presumably a large number are not seeking accreditation at all. Does that cause any challenges or difficulties?

Vicky Worthington: Yes.

Chair: Would you like to expand on that?

Vicky Worthington: This was a really quick check. About 25 to 30 charities that we know of have not approached an accrediting body that we know of. Probably four or five charities that are currently not accredited are hoping to become accredited. One of the issues is that if they are a very new charity or they have not trained a certain number of dogs, they are not eligible to apply for accreditation. Some of the accrediting bodies have eligibility requirements. For example, you must have trained five dogs and you must have been operating for a certain period of time before you can apply for accreditation. That would count some organisations out. And there is no compulsory accreditation anyway, so there is no real draw for the organisations that are not already working towards accreditation to go for it. There is no need for them in law to do that. We are seeing more commercial organisations offering assistance dog training, which is bringing its own issues, but again, they are not accredited. We don't know to what standards they train or work to welfare. It is a bit of an unknown, really.

Q3 Chair: I will come to you in a minute, Eleanor. Is there a one-size-fits-all? If I wish to train an assistance dog, are there different programmes for a dog that is going to support somebody with neurodiversity, a guide dog and a hearing dog?

Vicky Worthington: I can certainly talk in terms of our members. We have 13 members and most, if not all, specialise in one or more areas. Obviously, Guide Dogs and Hearing Dogs are very specialist. Some of our members are less specialist. Support Dogs, for example, will train dogs for autistic people, they will train assistance dogs that will alert people to seizures, and they also work in partnership with disabled people to train their own mobility assistance dogs. Some of our members only work in partnership with disabled people to train their own pet dog, and that can be for a variety of things. We have another member who specifically works with people to train their pet dog as a psychiatric assistance dog. So there is a huge range of assistance dogs, and some charities will specialise; others will be more general. But that is very much me speaking only from our membership's point of view.

Chair: Thank you. Eleanor?

Eleanor Briggs: I was just going to say—we might come on to this later—that that is why we think it would be helpful if we had a more standardised definition of an assistance dog, just so that we have real clarity about



what standard dogs have been trained to. That is really because it is all about public acceptability and what is reasonable. We just want people to have absolute confidence, when an assistance dog is coming in, that they are going to be well trained and that they are going to sit by their owner and not run around. In terms of some of the issues that guide dog owners and other assistance dog owners face with access refusals, which obviously have a huge impact on them, you would have real confidence around that.

Q4 Chair: So there is no specific standard. There is no formal requirement in legislation as to length of training and type of training. Would that help?

Vicky Worthington indicated assent.

Isabelle Atkins indicated assent.

Chair: Okay, I am going to go to Isabelle because she is nodding most encouragingly at that.

Isabelle Atkins: I can give a user's point of view. Luckily, I am in a privileged position: my dog comes from an organisation that is reasonably well known. It is all relative, of course. People know Guide Dogs particularly, but they do not necessarily know what other assistance dog organisations entail. Rumba wears a jacket that identifies her as an assistance dog and it is very clear, but I think there is a degree of scepticism from business and service providers, in particular, when a dog walks in with their human. That dog needs to be trained to a certain standard, and they do not necessarily believe, or are not able to believe, that that has happened if the dog has not come from an organisation, because there is no standard that these dogs need to meet in law to be reasonably adjusted for and to enter businesses and places like hospitals and more clinical settings where you need that imperative behaviour.

Vicky Worthington: I would just add that, in law, dogs do not even have to wear jackets.

Q5 Chair: I was going to ask specifically about the jackets. Isabelle's dog is in a jacket today, I assume—I can't see Rumba from here.

Isabelle Atkins: Yes.

Chair: Can any organisation order a jacket for its dog online?

Vicky Worthington: Any individual can.

Q6 Chair: Okay, so there is no kitemarked, formal assistance dog jacket.

Vicky Worthington: No. The colours of the jackets do not mean anything either. They are branded, really: the green jacket is for Dogs for Good, which has a green logo, and other members have different colours. An individual can go on any well-known website and order an assistance dog harness or jacket and put it on their dog. Sometimes those dogs have been very well trained by individuals—that happens—but other times they



are just plonking a harness on a poorly trained or untrained dog. That can happen too.

Isabelle Atkins: From a welfare perspective, the process these dogs go through from the ADUK organisations means they are rigorously socialised and trained, so you know that that dog is going to an environment that it will be happy in. You have the support of the organisations. If you want to introduce it to environments that it is perhaps less happy in—for example, trains—you build that up slowly and gradually.

These dogs are trained and chosen because they thrive in busy environments, but it could be considered cruel for a pet dog that has not been exposed to an environment to be thrown into a shopping centre with a harness on it when it is three years old. These are potentially very stressful environments for a dog, and in that sense there is no one looking out for the dog's welfare.

Eleanor Briggs: I want to stress one thing, which is that the guide dogs from Guide Dogs are really well trained. We are accredited by the International Guide Dog Federation. There is a really lengthy process for that training—as you can imagine when you see the amazing things they do. There is a very clear and robust training process.

Chair: I witnessed it on Saturday night; there was a guide dog in training at a concert I was at, and it sang along.

Q7

Carolyn Harris: I would like to talk about access and access refusals. I find it incredible that anyone who has an assistance dog would be denied access to any kind of venue or transportation, but the Open Doors campaign found that three in four guide dog owners had been turned away from a taxi, business or service. What are the main contributing factors? What excuses are people given for them not being allowed access? Eleanor, maybe you could answer that one.

Eleanor Briggs: Often we find that people do not actually give a reason, but a lot of the time it is around ignorance, not understanding the law, or not understanding what an assistance dog is and why it is different. In 2022, Guide Dogs did some research and found that 47% of retailers and 19% of people working in hospitality did not understand that it was illegal to have an access refusal for an assistance dog. If people do not understand the law, and that this is a different kind of dog, then you can see why access refusals sometimes occur.

Obviously, it is incredibly upsetting for assistance dog owners, and there is an impact on confidence, how they feel about going out and that type of thing. Imagine if you are going to get into taxi and you think you are going to miss your train—just the sense of it. We have spoken to guide dog owners who talked about feeling sick when calling for a taxi, because they do not know what the experience is going to be like.

Because of that, we are asking for better education. We are doing lots of work with retailers. We are also specifically working on taxis and private hire vehicles because, although there is an explicit mention in the Equality



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Act that it is a criminal offence to refuse access to an assistance dog owner, we still find high levels of access refusal there. We are asking for disability equality training to be introduced as part of the licensing process for taxi drivers and private hire vehicles, because we think that getting that education and understanding could make a real difference. They have that training in Northern Ireland, and we have seen that it has much lower levels of access refusal—it is really rare.

Q8 Carolyn Harris: I would suggest that it needs to be a licence requirement that they have an understanding of the rules and regulations, but what do I know?

I understand that if you are a taxi driver who cannot be near a dog for medical reasons, you can get an exemption certificate. Is that something that you regularly hear people saying—"I can't take the dog because I am exempt"?

Eleanor Briggs: Yes. My very diligent colleague looked this up for me, and I think there are actually about 92 proper exemption certifications with licensing authorities. If you have a genuine allergy—

Q9 Carolyn Harris: Across the country?

Eleanor Briggs: Yes—you can get an exemption certificate, but it is a small number of people who have them. Obviously, we would understand if someone had a genuine allergy, and then we would look for a reasonable adjustment to be that you would find another driver, or something, to make sure that that assistance dog owner can get where they need to go. It is only going to be in a small number of instances. If someone had an allergy and they were in a restaurant or something like that, then that would not be a reason to not let somebody in. There would be a way of accommodating that.

Q10 Carolyn Harris: If someone is denied travel in a car or access to a restaurant, is there a process whereby they can go to some organisation or body that would take the complaint on and deal with the company that has been part of the refusal, or is it all just left to go away into the ether?

Eleanor Briggs: Guide Dogs has an amazing access refusal team who work really hard on this. Last year, we had about 500 access refusals reported to us. We have an empowerment model; we work with guide dog owners so that, if they feel comfortable, they can take forward their own action and write to companies or whatever it might be. If it was for a taxi or private hire vehicle, they would want to report it to their local authority. We will support people with taking action and we will write ourselves, as an organisation, when necessary.

Q11 Chair: Can I just interrupt? Is 500 up or down?

Eleanor Briggs: Is it an increase?

Chair: Yes.

Eleanor Briggs: I think it is around the same as the year before, but I would have to check. I can come back to you with the figures.



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Q12 **Chair:** Part of our interest in this was provoked by me being approached by a constituent who had had their assistance dog refused access—I think it was specifically to a taxi. It would be really interesting to get the picture of whether this is getting better or worse, whether people’s awareness of assistance dogs is going up or down, and how understanding, helpful and constructive businesses and local authorities are being.

Eleanor Briggs: One thing I would stress is that those are people who have contacted Guide Dogs about it. I have people on my team who have experienced access refusals and occasionally not reported them, so that figure will definitely be a real under-reporting of what the number is.

Q13 **Chair:** Thank you. Isabelle, did you want to say something on that?

Isabelle Atkins: There are very overt cases of access refusal along the lines of, “No, you can’t come in. We’re not going to serve you—you have to leave the premises,” but there are the almost more insidious, subtle access refusals too. For example, I went to a theatre once and I was told, despite the website saying that I could take the dog into the auditorium with me, that she would have to go into the office behind the box office. Despite me showing this doorperson their own website that says, “It’s your choice whether your dog stays with you or not, but we can accommodate them if you would like them to be elsewhere,” this person was absolutely adamant that Rumba was not coming in with me. I did have to speak to a manager, and they apologised and let her in, but it is cases like that—

Q14 **Chair:** Yes, it is not an access refusal, but it would have been in the first instance.

Isabelle Atkins: It is also the case with private hire vehicles charging extra to carry a pet dog, or incurring a pet charge in a hotel, even though it is not a pet and they should not be charging.

Q15 **Carolyn Harris:** My question was going to be whether you had actually experienced this, but obviously you have. When you are preparing to go out, are you anticipating it? Are you planning for the arguments before you have even left? That could give your mental health a huge shock. How do you deal with having to pre-prepare?

Isabelle Atkins: It is very stressful. I come prepared. Every ADUK partnership has an ID, which helpfully explains all the laws and regulations. They now have a digital ID as well, which people can scan to gain more information about their rights and the customer’s rights. You are constantly prepared for a bit of a fight, which is really frustrating, because you do not want to be hostile. You want to be able to engage with people and explain, but it is really frustrating if you have security guards looking at you accusatorily. You are constantly on edge and just banking on the worst. You do not want to think the worst of people, but it really wears you down. It is very sad that you get home and go, “Actually, no, I had a good day because no one questioned it,” but that should not be the norm.

Q16 **Carolyn Harris:** So the norm is that you get home and think, “Well, today



went well. I was not constantly at war with someone.” Would you say that most days you encounter some kind of issue?

Isabelle Atkins: I am very lucky. I live locally to Dogs for Good, so a lot of the businesses that I frequent know of our dogs, although I have been asked if I am training a dog a few times, which is a bit interesting. I was also asked once whether my dog was a guide dog after I got out of the driver’s seat of my car, which was very odd. A lot of the businesses I go to on an everyday basis know about assistance dogs, but when I go further afield it is much more risky.

Q17 **Carolyn Harris:** Vicky, Isabelle talked about getting out from the car with the dog; are there different disabilities that dogs are used for that experience more negative reaction from the public?

Vicky Worthington: Yes. There are lots of different types of assistance dogs, and I think some of the newer ones that are not so well recognised might well experience more access refusals. There is a traditional view of a Labrador potentially guiding a visually impaired person or being next to a person with a wheelchair, and then you might have a medical detection dog that alerts to seizures.

Last night we were all looking at a dachshund. It makes no odds: it is working with its nose, not its size. We often get people emailing or calling us from both sides. We will get a partnership calling us saying, “I’m having real issues, because people say, ‘That’s not an assistance dog. That doesn’t look like my idea of an assistance dog’,” so they tend to find a lot more trouble if they do not have what we think of as a traditional assistance dog. We also have a lot of service providers calling us saying, “Am I having the wool pulled over my eyes here? This cannot possibly be an assistance dog, so I told them that they could not come in.” Yes—it is largely invisible disabilities and untraditional-looking assistance dogs.

Carolyn Harris: And therapy dogs. I know people who have dogs for their mental health, so I imagine that they would probably encounter more difficulties.

Vicky Worthington: There are people with psychiatric assistance dogs. The language we would use is “therapy dogs” for a dog that goes into a hospital with an owner, but yes, absolutely, a psychiatric assistance dog will. When you actually look at the person, they do not have a disability, so they often find themselves fighting and being questioned about their disability, which is unacceptable, and explaining what the dog does for them, which again is absolutely their business.

Carolyn Harris: If it is a mental health issue, not having to explain will really help you.

Vicky Worthington: Yes. There are autism assistance dogs as well. The last thing that an autistic person wants when they go out is a load of conflict about what the dog does for them. All access refusals are unacceptable, but there are definitely different layers.



Eleanor Briggs: I want to add two quick things. First, as businesses' policies around dogs have got more liberal, probably post covid, that has made things easier in some ways, but in other ways it has made it more complex and difficult. I have spoken to and heard of people who have gone into a restaurant with a group of about 10 or 15 people for a big celebration and they have been told that they and their dog can sit in the bar, which is where dogs can sit, and everybody else goes into the main restaurant. Obviously that is completely inappropriate and a misunderstanding of what the law is. The other thing—

Q18 **Chair:** Can it cut both ways? We have all become much more relaxed about taking our dogs everywhere with us post covid, but it is the converse for assistance dogs. People blithely assume that they will be able to take their ordinary dog anywhere, and for people with assistance dogs it has become, "We are entitled to take our assistance dog, and that is just your pooch that you want to bring out on a Saturday night."

Eleanor Briggs: Yes, and I think that comes back to the point I made earlier around the importance of the definition and having real clarity on that, so that we can be really clear that these are really highly trained dogs that perform a task to assist a disabled person, and that is why they are coming into the restaurant and will sit down and be really well behaved: they are working. That is obviously completely different to going in there with your pet dog.

The other thing I wanted to come back to was the issue of reporting. We have our fantastic access team and we record the cases that come to us, but that is not sufficient. We have been asking for the Government to publish the data that local authorities and licensing teams have around taxi and private hire vehicles, but also to look at how they can monitor and publish data around wider access refusals as well, because it is really important that we can monitor that. Obviously Guide Dogs can only do so much.

Q19 **Carolyn Harris:** Can I ask briefly about good practice? There must be some companies and organisations whose policies are exemplars that we should all follow. Do you want to namecheck some of the good ones and namecheck some of the bad ones?

Eleanor Briggs: We probably wouldn't want to namecheck anyone. There are some big organisations that we work with who are doing really good things like training their security guards and things like that and coming up with policies that they are developing with us, which is really positive, but you will always find maybe a couple of branches doing an amazing job and then another branch in a different part of the country where someone might have a really negative experience. But we are working with retailers and others to improve policies. Sometimes we get a good response.

We had an access refusal recently. We informed the company that that had happened, and they were really apologetic and emailed all their staff to remind them that assistance dogs have rights and that access refusal is against the law. So we are working with people to improve things, but



obviously much more needs to be done, as you can see from the level of access refusals that people are experiencing.

Q20 Carolyn Harris: Isabelle, as a service user, is one sector worse than the other, or is one organisation worse than another, or better?

Isabelle Atkins: I think I am going to echo what Eleanor said. You cannot bank on a chain restaurant, for example, adhering to the rules any more than an independent place. I have had good experiences in branches of certain hotels and then in other branches not so good experiences. I do not think there is any one sector that you can tar with a brush as being uniformly negative across the board. It is very much a case-by-case basis and it is an individual-by-individual basis. It depends on who you have got on reception and on who you have got behind the till, and whether they have had the training and are equipped with the knowledge and empowered to know what an assistance dog is and what that dog is doing for their disabled person.

Vicky Worthington: We all know that good policy does not actually mean good practice. We do quite a lot of policy work with larger organisations to try and bring their policy in line with at least good practice, or at least in line with the law. Even where we find that some of those organisations are really, really trying, without the education and the training behind it for their staff you are going to get inconsistent behaviour a lot of the time, and that can be problematic. Once you have called the manager it is sorted out, because the manager knows, but for the staff on the ground that work is not trickling down.

Q21 Dame Jackie Doyle-Price: Isabelle, how straightforward is it to report a service refusal?

Isabelle Atkins: It basically doesn't exist outside taxis and private hire vehicles. We do not have a team. As far as I am aware, no other UK organisation has a team for access refusals. As a client I am empowered by Dogs for Good to engage with my instructor, who might take that on. But there is no reporting mechanism at the moment beyond taxis and private hire vehicles. Even then, you need licence numbers. If it is a car refusing you access and it speeds away, you do not have that information. There is no central register for access refusals. As a client I do not feel empowered to challenge it beyond going to each individual organisation. It would be like, "This hotel from your company refused me access." Even then it is a case-by-case basis. There are no uniform repercussions for these refusals.

Dame Jackie Doyle-Price: So we are talking about substantial under-reporting.

Isabelle Atkins: Absolutely.

Q22 Dame Jackie Doyle-Price: I was struck by what you were saying, Eleanor. Generally, people will only complain if they think their complaint will be redressed. People won't bother if they think nothing will change. Is that sitting behind the under-reporting?



Isabelle Atkins: Absolutely, yes. As I said earlier, if you are on your third access refusal of the day, you are exhausted. You are not going to challenge it; you just accept it and go to a different shop or go home. I think it is a huge issue that is definitely not being addressed. As an assistance dog user, I do not feel empowered to deal with that on an individual basis because it is exhausting. I deal with enough aggression and enough issues in my day-to-day life without having to challenge everyone who refuses my access on top of that.

Q23 **Dame Jackie Doyle-Price:** You do not need that cluttering up your brain, basically. What do we do about it?

Vicky Worthington: Everything that I have looked at always comes back to the fact that having a clear definition of assistance dogs would be helpful. That is because it is very difficult when there is not a clear definition of what a highly trained assistance dog is to then push forward by saying that you have been discriminated against because, "This is my dog." But that is the real top-level stuff that we would like to see.

I think there is something in there as well about if service providers are more confident that the dogs they are seeing as assistance dogs have been trained to a standard, they might have more confidence and there would be less access refusals. I do not think that would sort the whole problem out, because it is bigger than that, but for Assistance Dogs UK that is certainly something that we keep coming back to.

Eleanor Briggs: It is important to say that there are cases—I remember that Guide Dogs was going to party conference, and one of the guide dog owners who was coming to be on the stand had an access refusal on the way. It was a taxi or private hire vehicle. They went to the licensing authority and there was a criminal case around that. There is a fine of up to £1,000, and a driver can have their licence revoked for a period of time. There are steps that can happen, but we know that it is more complicated for people when it is a civil breach.

We are interested in working with the Government around what we could do to strengthen the law. There are various options we are looking at, but it is about whether we could potentially clarify the definition of "reasonable adjustment", so that it is clear in the law that having an assistance dog is a reasonable adjustment. That would mean there is less burden on people with assistance dogs to show every time that having their dog is a reasonable adjustment.

Also, Isabelle was just talking about how people feel and the burden of it. If we could actually make that process easier for people, I think that helps. You have education, but you also have people successfully taking cases, so that retailers and others realise that there are teeth behind the law and there are consequences, so anything we could do around that would help. We have also talked about local authority licensing and what we could do around that as well, and whether there is something around the issuing of licences where we could have information around access refusals and responsibilities around disability equality.



Q24 Dame Jackie Doyle-Price: Can you tell me about the app and how that is being used to report things?

Eleanor Briggs: Yes, sure. We have an access team, who I have mentioned—I am giving them lots of plugs this afternoon. There is an app that guide dog owners can download. On that, you can basically register if an access refusal has occurred, and you will start getting support from the team on that. I think it has been downloaded about 2,200 times. When I was looking at the data about how people had contacted our team around refusals, about 38%—something around that—had been using the app. It is not just restricted to the app: you can also email in or call our Guide Line—our telephone helpline—so there are other ways of contacting the team as well.

Dame Jackie Doyle-Price: Okay, so we are not entirely reliant on smartphones then.

Eleanor Briggs: No.

Q25 Dame Jackie Doyle-Price: Again, this is really a follow-on question, and to an extent you have already answered it. As you said, you do not generally feel confident that when you report something, it would be appropriately actioned. You are here giving evidence to this Committee. We have heard in quite a lot of evidence that perhaps there is not sufficient understanding of the legal obligations, which is obviously something that we can take away. Do you have a pitch for the Committee on what you think we need to do to ensure that the rights you have in law are properly respected?

Isabelle Atkins: I think it is a key education piece. A lot of the issues that people who use assistance dogs face come from ignorance; they do not come from a place of malice. Whether it is people interfering with your dog when you are out and about, or whether it is access refusals, it is all about encouraging people to learn what an assistance dog is.

Again, this partly comes back to definition. It is about understanding what that dog does, why it is with you 24/7, and the benefits that that brings to not only the disabled person but the people around them and wider society. Because of Rumba, I am going to be living independently and I have a job, and that is all enabled by her. I do not think people appreciate the day-to-day support that she provides. It is crucial in enabling that, and it is crucial for me to live the life that I want to lead.

These dogs are essential in getting people out, getting them into their communities, getting them working, volunteering and participating outside of the home. But a lot of people think, “Oh, you just want to bring a dog with you.” That is what is difficult about people who put an assistance dog jacket on their pet dog: they don’t appreciate the ins and outs of what this dog does and how it mitigates a disability. In a way, it is almost appropriating the ramifications of my disability. It is very much an education piece.

Q26 Dame Jackie Doyle-Price: I got the impression from your earlier



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remarks—not to put words in your mouth—that, outside of taxis and private hire, it was a complete waste of time. The interesting thing about taxis and private hire is that they are obviously licensed by a licensing authority, which is the local authority, so there is clearly an enforcement arm to make sure the law is applied. In terms of other services that you seek to access—you mentioned the theatre—is the issue that we do not have an appropriate regulator to be that stick?

Isabelle Atkins: Absolutely. I think it is very much a carrot-and-stick issue. As Eleanor said, you need some teeth behind the law, but if you are reporting to a company, there is no prerogative for them to enforce the law for themselves, especially when it could be seen as expensive or detrimental.

There needs to be some sort of central enforcement body. You cannot ring the police and say, “I’ve been refused access to a shop,” because you will be waiting hours for them to arrive as it is not an emergency, and that defeats the point. There needs to be some sort of enforcement, some standards to uphold and some expectations, and there need to be ramifications if they don’t uphold them.

Q27 Dame Jackie Doyle-Price: In which sectors do you face the most trouble? I would guess retail.

Isabelle Atkins: Retail, and particularly restaurants and places that serve food, like cafés: “Oh, we can’t have a dog around food.” Hotels as well—basically every public service provider.

Dame Jackie Doyle-Price: Thank you. That is very helpful.

Q28 Chair: To follow up, does it ever cross anybody’s mind to report this to the Equality and Human Rights Commission? Would you ever dream of doing that?

Isabelle Atkins: No. You have to see it as a cumulative problem. One instance of access refusal is one instance of access refusal, and it is part of a bigger problem. You are not going to address that one instance—it does not have the weight behind it to warrant going to somewhere like the EHRC—but cumulatively it has a huge impact on an assistance dog user’s life.

Dame Jackie Doyle-Price: Yes, the whole is greater than the sum of its parts, isn’t it?

Vicky Worthington: When an assistance dog user has an access refusal and comes to us, we tend to send them back to the organisation that trained the dog. A lot of people who come to us have individually trained their dogs, and we are a source of information. We will always offer the Equality and Human Rights Commission advisory line for them to go to. We always signpost them to that, but we don’t know how many of them follow it up. Sometimes people come back and say, “I don’t think they really knew how to help.” In the same way, I have seen countless letters from partnerships that have written to their MP and had responses, and they didn’t really know how to help either. There is a lack of consistency



about what to do, other than to take out huge debt to privately try to address the situation. It can be very difficult.

Q29 Dame Jackie Doyle-Price: So we need a better understanding of the rights and the empowerment behind them. That is something that we probably need to take away. I have some other questions about access issues. I have to say that the lobbying of MPs on pavement parking is probably one of the best examples of good, well-organised lobbying that I have seen in my 14 years as a Member of Parliament. Vicky, the floor is yours.

Vicky Worthington: I am going to give the floor to either of my colleagues, because Eleanor has been integral in working with that and Isabelle is a pavement parking warrior.

Eleanor Briggs: You are absolutely right that pavement parking is such a huge issue. It is the thing that people talk to us about the most. We did some research, and 81% of people with a vision impairment said that having no obstacles on the pavement would make their lives so much easier. Four out of five people with a vision impairment experience problems with pavement parking every week, and more than 95% of people have had to go on to the road because of parked cars. Guide dogs and assistance dogs are amazing, and they can take someone and recognise there is a parked car there, but somebody has to make that judgment call and step into the road, and there could be traffic coming through.

We are passionate about getting change in this area, but we have been waiting a while now. It has been about four years since there was a consultation on this that looked at what the options are, and we are really keen to see it taken forward. In London and Scotland, pavement parking is prohibited apart from in certain circumstances, but in the rest of the country it isn't, and we know it is really impacting on people's lives.

Q30 Dame Jackie Doyle-Price: Four years—not good enough. That is not unfamiliar, frankly.

Isabelle Atkins: I am a bit of a one-woman crusade about pavement parking in my village. As a vulnerable road user—not really a pedestrian—it is scary, because you are putting yourself out into the road. I am very lucky that I can see oncoming traffic, but that doesn't necessary mean that I can be seen. That runs the risk of putting Rumba in danger too, because she has to come with me, and it is generally totally unnecessary. Again, a lot of the time it comes down to ignorance, and people prioritising convenience over access. Unfortunately, that is an all-too-familiar story.

Q31 Dame Jackie Doyle-Price: There is an issue with modern housing estates, which have narrow roads. Certainly, where I live, pavement parking rather than parking in the road seems to be the norm. I can see that that is an escalating nuisance. What about things like collection points for rental bikes? Have they caused you a nuisance? I love that roll of the eyes. Please, go on—share, unburden.



Isabelle Atkins: Navigating my way through London is a nightmare, just because e-scooters and e-bikes get recklessly abandoned without any second thought over dropped kerbs, on pavement corners, in really dangerous positions where there is no camber to the road. I don't think people realise just how difficult it is to navigate with a disability, whether it is a mobility issue or a visual impairment. Working your way around those obstacles is painful, dangerous, exhausting and very demoralising because you know you aren't even an afterthought in people's activities. A few seconds just to tuck it to the side of the path wouldn't hurt anyone. There needs to be some sort of bank enforcement.

Q32 **Dame Jackie Doyle-Price:** It does beg the question whether the public sector equality duty, which is supposed to be applied to every legislative decision and policy, is worth the paper it is written on. Clearly, we have made policy in the whole area of rental scooters and e-scooters without thinking about the impact on disabled people, because we are just thinking about the users and not the wider impact. Do you have any observations on that, Vicky, and the issue of rental scooters?

Vicky Worthington: No, not particularly. I feel you have covered it quite well. This is not really an area we have worked on with our members. Our members tend to work individually. They are very autonomous charities, so they tend to do that work on their own. It is not something that we are running with them at the moment.

Q33 **Dame Jackie Doyle-Price:** Eleanor?

Eleanor Briggs: We are looking at this with other organisations and Transport for London to work out what can be done. We would like to see off-road docking areas, and more sanctions for what happens when bikes are left there.

I wanted to come back to something you said about pavement parking and narrower streets. That is an area that can be sometimes more contentious when you talk to people about it as a campaign, because they feel like there are occasions when they have to park on the pavement. So, I want to be clear that we are not asking for a complete ban on pavement parking; we are asking for a law around dangerous parking. Local authorities would have the ability to decide areas where pavement parking is sometimes necessary. We do recognise that there will be those occasions. When you have got that, people can plan their routes, they know where they can go and where they can't go, and they can work around it. There is also clarity for motorists then about what they can do. I want to be clear that it is not a complete ban that we are asking for, because we get a lot of pushback around that.

Dame Jackie Doyle-Price: Yes, it is more about street design, isn't it? But if you have got unregulated pavement parking—so it is not a straightforward ban that you are after. It is sensible parking, which takes into account the needs of all street users.

Eleanor Briggs: Yes.

Q34 **Dame Jackie Doyle-Price:** To what extent are floating bus stops a concern?

Eleanor Briggs: Floating bus stops are a real concern. In fact, Guide Dogs are doing some work at the moment with UCL looking at that. We are looking at bus stop islands and bus stop borders. It is a similar thing—that sense of fear that people have talked to us about, that they are going to have to step off and potentially be going into the path of a cycle. When we have been working on this before we have not really had evidence. We know anecdotally that people find it very stressful.

We have done focus groups recently and people have been talking about how they have been changing their routes, completely avoiding bus stops, and things like that, because it is so frightening. At the moment we are doing this research with UCL, which we will be publishing in the summer/autumn. That will have some concrete evidence about the impact, which will hopefully really help us make the case for some changes and adjustments, to make sure that safety is there for disabled people.

Q35 **Dame Jackie Doyle-Price:** It feels like we need to have something about street furniture and how transport facilities are designed to deal with this. My final set of questions is on issues around accommodation. Isabelle, you talked about hotels earlier. As well as hotel accommodation, have you come across instances where people wanted to take out rental properties and been discriminated against because of their assistance dogs? Similarly, if people have had to go into a care home and wish to be accompanied by their dog, have we any instances of that?

Eleanor Briggs: Around accommodation, yes we have. I have to say it is so difficult to prove—probably more difficult than with an access refusal, where it is often a clear out-and-out access refusal. When you are trying to get rented accommodation, you can ring up, it can become apparent, or you can mention that you have an assistance dog, and then suddenly that property is no longer available. How can you prove whether that is because you have an assistance dog, or because we have a very hot rental market at the moment and properties are flying off before you even have a chance? So, it is a really tricky one. We know anecdotally it is happening, but we don't really have that concrete evidence. So, it is something we are thinking about.

Q36 **Dame Jackie Doyle-Price:** Okay. What about residential care homes or nursing homes?

Eleanor Briggs: That is an interesting one. I can take it back to the team and come back. Obviously, you would be allowed to take your assistance dog with you, but I am not sure whether they have been problems around that.

Q37 **Dame Jackie Doyle-Price:** It would be interesting to hear if there were any. Arguably, it could be suggested that you no longer need it because you are living in supported accommodation, but obviously the need is wider than that.



Eleanor Briggs: And there are also lots of different types of supported accommodation. Obviously, our dogs are active, working dogs and they do need to go out and be exercised and all of that, so that is important. But there could be a whole range of sheltered accommodation.

Q38 **Dame Jackie Doyle-Price:** Our experience is that there are care providers and care providers, so it would be interesting to get some feedback. Is there anything that you want to share on this, Vicky?

Vicky Worthington: Private rentals are a huge issue that we have come across. We have produced quick guides, which are just what they sound like, and they help. They are aimed at landlords to make sure that they understand that they cannot discriminate because someone has an assistance dog and that it is not a pet—all of that. We also have a huge number of individuals phoning up to say, "Have you got anything that I can take to the letting agency?" Eleanor is quite right: proving something like that is hugely difficult. But actually, it is really, really bad within letting agencies rather than just individual landlords. We often will get landlords ringing us and saying, "I don't have to, right?" or "I just say 'no pets'—I'm allergic." I say, "Well, you're not going to be living there with them." We have it a lot and it is a big problem.

We have had a couple of people—and this is heartbreaking—wanting us to certify their pet dogs because they are moving into sheltered accommodation and they aren't allowed to take their pet dogs, so they are hoping to get them certified as an assistance dog, which is not something we do, so we can't help. They are heartbreaking stories, because nobody should have to be parted from their pet dog anyway. That is the type that we are getting at the moment.

Q39 **Dame Jackie Doyle-Price:** The problem is that there is more demand than there is supply of rental properties; and as you say, to prove discrimination is rather difficult.

Eleanor Briggs: I wanted to add one thing which is topical at the moment, around the Renters (Reform) Bill. Obviously, that could be positive in the sense that it will normalise dogs being in rental property, but we will just be really keen to make sure that people recognise that there is a difference—as we have been saying all afternoon—between a pet dog and an assistance dog, and that you don't have the right to say no to an assistance dog.

Isabelle Atkins: I think this is worth flagging. As I said, I am moving out shortly and I applied for council housing, after being unable to find anything on the private market for a number of years. Finally, I have been offered a place and even then the housing association asked, "Oh, do you have any pets?" I said, "No, no. I have an assistance dog," and they said, "Okay; we will put that down as a dog, then. You will have to get approval for that." I said, "No. It's an assistance dog. It is required by law to allow access." Anecdotally, I know from a lot of my other Dogs for Good clients—we have had issues with landlords refusing to put in a spending area, for example, because they do not want a dog weeing on their lawn.



Again, it becomes very difficult, as Eleanor says, to prove that landlords are acting negatively towards clients because of an assistance dog. But generally, landlords can be quite hostile towards disabled people anyway, because of the adaptations they need and the reasonable adjustments they need, including assistance dogs.

Q40 Chair: Isabelle, can I take you back to one of Jackie's comments about street furniture? How are assistance dogs impacted by the sudden arrival of street furniture? Are there any requirements? This might be a question for Vicky and Eleanor as well. Are there any requirements for utilities providers, for example—I am thinking of broadband cabinets—to consult before they stick obstacles all over pavements?

Isabelle Atkins: Our dogs are very good at adapting, so if a box magically appears, they will work around it; they won't just blindly walk into it. But there is a huge issue, particularly, I have found in my local environment, of councils not maintaining things like hedges. Low-hanging branches and that sort of thing then become a hazard, particularly in relation to guide dogs. Guide dogs work at eye-level height for them. Obviously, if a hazard is up at a human eye-level height, they might not notice it, and the human will walk straight into the branch. So there needs to be some ensuring of maintenance of public spaces to allow people to get around.

Something that I have particularly found is poor quality of pavements, particularly if they have been dug up for something like gasworks and then just haphazardly concreted over. That can be very difficult. I almost ejected myself out of my chair getting here this morning because of a dropped kerb that was not properly dropped. It becomes very difficult. You are pushing a wheelchair and handling a dog at the same time, you are constantly looking around but there are all these confounding variables, and you just don't have eyes in the back of your head. It can be very dangerous. If I eject myself then Rumba is going with me, and that potentially puts her in danger. So it is very much an issue of access for everyone with an assistance dog.

Q41 Elliot Colburn: My final set of questions are around legislation and guidance. All of you have mentioned throughout your evidence that you would like to see an updated legal definition of assistance dogs. You have said that the law does not necessarily sufficiently protect assistance dog owners from discrimination. Before we move on, I wondered whether there was anything you had not mentioned in relation to the updated definition that you would like to touch on. Vicky, I will start with you.

Vicky Worthington: For us as an organisation we would very much like to see two things. First, we would ultimately like to see some kind of third-party accreditation involved, and for that to be in a definition. We are not precious about what that is, but we think it is important that anybody who trains an assistance dog, whether it is through one of our members, individually, or independently, can have access to some kind of third-party certification.



Q42 **Elliot Colburn:** You say you are not precious about who, but is there an existing regulatory body of some kind that would make sense, such as DEFRA, or do you think a brand-new body should be set up?

Vicky Worthington: I am not sure about the answer to that. At the moment we have two main accrediting bodies that are internationally accredited—the International Guide Dog Federation and Assistance Dogs International. They accredit organisations so that they can accredit the dogs they've trained. We are currently working with an organisation called the Assistance Dog Assessment Association, which is a brand-new tiny charity, but they will accredit individual dogs. There are new models setting up, but we would welcome some kind of central register, especially if there were third-party accreditors. Some kind of central register would be great, but I am not sure how that would work. We are exploring lots of options that we can present as wonderful solutions to that.

Isabelle Atkins: Coming back to the definition, there is an issue that I have found personally with differentiation between assistance dogs and emotional support dogs. Some sort of distinction needs to be made between the two, to enable assistance dog users to fully access the world. Emotional support dogs are not trained—they are not task-trained to mitigate disability in the way an assistance dog is. Actually, the way the Equality Act is written, you could read it to mean that an emotional support dog with no training is given the same rights as an assistance dog, in access. So the wording is very vague and very unhelpful when you are trying to fight your corner and explain that that your highly trained assistance dog is not going to pose any issues.

Another point is around the DWP's definition of an assistance dog, which currently is only for hearing and guide dogs. So when I applied most recently for the personal independence payment, I was given no points regarding the assistance that Rumba supplies, for example with getting dressed and undressed, and even the moving-around components. I know that recent proposals to PIP reform will be moving potentially towards voucher payments and that sort of thing; there needs to be appreciation of the cost of an assistance dog, because they are expensive. They have high insurance premiums because of the public liability on them, and they are fed normally very specific diets, but that is not taken into account when awarding PIP. Consequently, that is potentially going to deny people access to an assistance dog that may get them into work or get them out into the community. I don't quite understand where the definitions come from for the DWP, but this is definitely something that needs to be addressed, and then hopefully related back to a broader definition of an assistance dog.

Eleanor Briggs: That really underlines the important point about consistency, which is what we really need. We need dogs to be able to be clearly identified and clearly verified. I think that will help with a lot of the problems that we have. Although, at the moment, there are clear civil breaches and you can take cases around access refusals outside of private hire vehicles and taxis, if we have that clear definition, it will really help us to be more precise and tighten up the law in other places.



Q43 Elliot Colburn: Thank you all for that. Isabelle, I want to pick up on the point about the difference between an assistance dog and an emotional support dog. Does an emotional support dog have any medical reality? Is there a scientific basis for the existence of emotional support dogs to support a human being, or is there a massive problem here where we have assistance dogs providing specific tasks and assistance, and untrained dogs that essentially anyone could claim is providing them with emotional support and therefore gaining them access to certain services?

Isabelle Atkins: That is the difficulty. In law, there is really no distinction between an emotional support dog and a pet, in terms of the emotional support it provides. Essentially, it is a pet in a vest. I don't doubt that pets provide huge emotional support for people with non-disabling cases of anxiety, depression and so on, but for a dog to count as an assistance dog, it needs to mitigate a disability, so it has to be for a disabling condition.

Because there is no standard that these assistance dogs need to meet at the moment, it becomes very ambiguous as to what you can and cannot enforce, and if you are putting out untrained, unsocialised animals, it is just as difficult for me to go into an environment containing an emotional support dog as it is to go into one containing a pet dog. It could be barking at Rumba, distracting her, trying to engage with her and sniff her backside and all the things that dogs do that assistance dogs don't, which ultimately impacts my independence and the independence of other assistance dog users.

Q44 Elliot Colburn: Vicky, on that same point, in terms of having an updated definition and an updated legal framework, would it be helpful to crystallise that difference between emotional support dogs and assistance dogs? Let's say for the sake of argument that we update the legislation and say, "Okay, we will recognise, legally, that emotional support dogs exist and that they provide a service," but that they should be given—I don't want to say lesser rights, but slightly different treatment in terms of how we tier the rights and access that they provide. Would that help, or am I barking up the wrong tree here? *[Interruption.]* Oh, no, sorry! I honestly didn't mean to do that. I do apologise.

Vicky Worthington: We haven't really thought about a tiered kind of access. For us, it is all about training. We are not in the business of telling people whose disability is more or less worthy of an assistance dog; that is not for us to say. It is all about the training. If somebody has a disability and they have trained their dog to mitigate that disability, you might have called it an emotional support dog. For example, 10 years ago—I am going back probably too far—we maybe would have seen PTSD assistance dogs as emotional support dogs, but we recognise them now as assistance dogs because they have had that level of training. Again, it is not for us to say, "This condition is worthy and this isn't." It is purely about the training. So yes, it very much would be useful to have that distinction.

I will say that the Equality and Human Rights Commission has recently updated its guidance, and it does explicitly say that emotional support



dogs are not referenced in law and so do not have that level of access. No one is saying that emotional support dogs, as we understand them, do not bring huge benefits to the people that rely on them, but I think that there needs to be a distinction so that people who rely on assistance dogs for their independence and to mitigate against a disability do not have their rights restricted because of it.

Isabelle Atkins: It is also a reassurance for service providers that a dog coming into their environment is task trained and trained to a standard of behaviour—it is a reciprocal thing between its handler and a business—whereas an emotional support dog potentially hasn't gone through that socialisation or training and might pose a hazard in an environment that an assistance dog wouldn't. Again, that definition and standard of training need to come in to assure businesses that they are doing the right thing by making that reasonable adjustment and allowing assistance dogs into their premises.

Q45 **Elliot Colburn:** That makes sense. That would hopefully deal with any potential abuse of the system where you could claim that any of your dogs could be an emotional support dog. Eleanor, if it has not already been covered, I will ask you the same question.

Eleanor Briggs: I think Isabelle and Vicky have covered that pretty well. It comes back to that really important sense of what is reasonable. It is a reasonable adjustment, so it has to be reasonable. That goes back to training, as Vicky and Isabelle have said.

Q46 **Elliot Colburn:** Thank you. The disability action plan published in February considers support for people with assistance dogs. I am interested to hear from all of you—starting with you, Eleanor—what your take on that document is. Does it go far enough? Do you think it will deliver meaningful change? What engagement, if any, were you able to have in the run-up to its publication?

Eleanor Briggs: We really welcomed Tom Pursglove's and now Mims Davies' support for assistance dogs. We welcome the fact that we had a specific mention in there and that the working group is being set up. We now need to make sure that anything that comes out of the working group—I think the first meeting is sometime next month—does not get caught up in any change in Government. We would like to see the recommendations that come out of that group recognised and taken forward. It would be a shame if that did not happen after all the experts came together and made recommendations about all the problems we have talked about today, which are really challenging for disabled people. It is an opportunity, and we want to make sure that the most is made of it.

Q47 **Elliot Colburn:** Indeed. We have all been on tenterhooks today, as you may well know. Vicky, the same question on the disability action plan.

Vicky Worthington: I would just echo what Eleanor said. Our biggest concern is that whatever might happen soon might derail that group when we haven't really even met once yet. It is already a bit delayed. We are



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very keen to see that operate outside of whoever gets in so that it isn't put to one side. We are keen for some assurances on the actions that will come out of it and what will happen. Will we see them come to fruition?

Isabelle Atkins: I echo what Eleanor and Vicky have said. As a disabled person, I don't want it to be just another tokenistic piece of paper.

Elliot Colburn: It has to have some tangible—

Isabelle Atkins: It has to have some substance behind it.

Q48 **Elliot Colburn:** And is training one of the big things that has to come out of that?

Isabelle Atkins: Training is one of the big things; access refusals and some sort of reporting mechanism; and just a general education piece on assistance dogs, making sure that everyone knows what they are and what they do and encouraging people throughout Government and local government to ensure that the people they provide services through know what an assistance dog is and what it does.

Elliot Colburn: Thank you all very much, and apologies again for the terrible unintended pun.

Q49 **Chair:** Yes, it was quite bad. On the final points you just made, Isabelle, I can't quite believe that nobody has yet introduced some sort of app where you can quickly and easily report access problems. If someone were to do that, who should it be? Should the EHRC be tasked with it?

Isabelle Atkins: There is an app; it is called Twitter. Because there is no enforcement body, you are yelling out into an abyss, essentially. You can report access refusals until the cows come home, but if no one is enforcing them, what is the point? You drum up enough outrage on social media, and you get an apology and maybe a voucher for your next stay at a hotel, but actually—

Chair: Yes, it is very obvious that the shame of social media is the most effective reporting tool. The stats show that in the year to March '23, the EHRC had 47 complaints. That is nothing, is it? Absolutely nothing. I wonder whether, if we had the definition and there were an easy reporting tool, you would begin to see the reports rack up and therefore bodies like the EHRC being forced to take action. That might be a useful suggestion we could make as a Committee.

Isabelle Atkins indicated assent.

Q50 **Chair:** I thought that the DWP point you made was fascinating, because it would be something useful that this Committee could suggest to the DWP, would it not—this is not a question; you can agree with me or not, I suppose—that there should be a recognition of more types of assistance dog beyond a hearing dog or a guide dog? As you said, an assistance dog can enable you to get dressed in the morning, do your daily commute and go to work.



Isabelle Atkins: Yes. Legally, Rumba is an auxiliary aid, but she is not an aid by the definition of the criteria for PIP. I appreciate that there is a lot of tumultuousness about that at the moment. Whatever my opinions are and whatever happens, there needs to be some sort of support for people who have assistance dogs, whether that is through an organisation or they are owner-trained, to acknowledge that that dog has a huge enabling social weight behind it. I don't think a voucher system, for example, would work, because I am not sure a vet is going to take that when—

Q51 **Chair:** Vicky and Eleanor, have your organisations fed into that consultation process, or do you intend to?

Vicky Worthington: Yes, we do. We will be putting in a joint ADUK response for all our members. Some of our members might well reply individually as well.

Chair: I was going to say: is a joint response necessarily the best tactic?

Vicky Worthington: That is what our members want us to do, but we always encourage them to respond separately as well. Some of our member organisations are tiny—one of them is run by two people from their spare bedroom—so by putting in a joint response we are helping them out a bit, but we will encourage separate ones as well. But yes, we are engaging in that.

Chair: Eleanor?

Eleanor Briggs: Yes. In fact, we had a meeting last week of the VI Charity Sector Partnership and this was an item on the agenda and there was a lot of discussion about it, so I think there will be a lot of contributions.

Chair: Great. Can I thank all our witnesses for your evidence this afternoon? If anything occurs to you that you haven't mentioned and you wish to follow up in writing, please do. I think our intention is not to publish a full-blown report, but certainly to make contact with the significant bodies that I might have just mentioned to see what action they can take. Thank you very much.