

Dogs Trust submission of 25 March 2024

PE2058/D: Require all dog boarding kennels to install smoke detectors, smoke alarms and sprinkler systems

Dogs Trust is addressing the following points requested by the Citizen Participation and Public Petitions Committee:

- information about licensing and the fire safety measures that are typically used in rehoming kennels in Scotland and the cost of sprinkler systems as well as whether there are alternative, more cost effective options; and
- an indication of whether the ask of the petition would have any unintended consequences

Dogs Trust has robust fire safety measures in place which are standard across all our rehoming centres in the UK and Ireland, including our two centres based in Scotland in West Calder and Glasgow. These measures are in line with all legal requirements including those outlined in The Regulatory Reform (Fire Safety) Order 2005 and the emergency requirements in The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021 (2021 Regulations).

Scottish Government guidance for Animal Welfare Establishments (AWEs) under the 2021 Regulations includes emergencies, with specific guidance on smoke detectors and carbon monoxide detectors. The Scottish Government consulted in 2023 on bringing animal boarding under the scope of the 2021 Regulations; a proposal which Dogs Trust supports and we would hope to see the creation of guidance under any new legislation for boarding establishments which mirrors the aforementioned guidance for AWEs as a minimum.

For ease of reference, the guidance for the 2021 Regulations can be found [here](#).

The measures that Dogs Trust buildings have in place include hard-wired fire detection systems covering every kennel block, building and live in

accommodation onsite. The live in staff are onsite 24/7 to respond to emergencies immediately.

Fire alarms are tested weekly and serviced every six months. There is a robust dog evacuation plan as well as an out-of-hours evacuation plan, and fire extinguishers are readily available in each kennel block.

There is maintenance of all equipment to ensure it is in full working order at all times and there are thorough fire risk assessments as well as health and safety audits, Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) assessments and staff training on fire prevention, fire warden training and regular drills.

Kennels are made up of two areas: sleep and run. The sleep area is within the insulated and heated envelope of the building and the run area is outside and covered with a roof. The two areas are separated by a hatch, so dogs would be able to move away from any initial danger before evacuation. There are clear, designated safe spaces for dogs to be evacuated to.

Sprinklers

Dogs Trust does not have sprinkler systems installed in our centres as standard due to the alternative fire prevention measures in place and we prioritise limiting as many flammable materials as possible. This reduces the risk of fires starting and spreading.

If the Committee would like more technical information on the design of our kennels in relation to fire safety, one of our architects can provide a design statement on request – please let us know if this would be useful.

Sprinkler systems can be expensive and as we have substantial alternative fire prevention in place, this is not something we would consider installing at this time.

Costing for a sprinkler system

It is challenging to be able to provide an accurate costing to install a sprinkler system. We have consulted a contractor and they have said that it would most likely equal contracting a designer and a fire strategy expert to look at layout, where the sprinklers would be installed etc. so it is difficult to get a true estimate. The contractor gave a rough estimate of tens of thousands of pounds to install a sprinkler system at one of our centres.

Unintended consequences

Our knowledge of sprinkler systems is limited and therefore the information provided here is anecdotal.

There may be issues with sprinkler systems in freezing weather and corrosion risks. Depending on how long a sprinkler system would take to install, there would be disruption to dogs in a rescue centre resulting from noise of installation or upheaval from having to be moved from their kennels for the system to be implemented. In some cases, this can be stressful for the dogs and is something that those caring for dogs would want to minimise, especially in the case of dogs being rehabilitated.