



## Policy 379

# Investigation of Animal Welfare Concerns

<b>Responsible Official:</b>	Research Administration
<b>Administering Division/Department:</b>	Research Compliance and Regulatory Affairs / IACUC
<b>Effective Date:</b>	11/02/2016
<b>Last Revision Date:</b>	06/15/2022

### Purpose:

To help ensure that laboratory animals receive humane care, use or treatment in accordance with the highest ethical standards, laws, regulations and policies governing animal research, the IACUC must review and, if warranted, address animal-related concerns raised by institutional employees or the public. When the IACUC receives whistleblower concerns (see Policy 306 Whistleblower) regarding the use of animals in research, testing, or teaching, the IACUC shall investigate the concerns as outlined below:

**379.1** When a whistleblower concern is received by the IACUC, the IACUC Director, the Attending Veterinarian (AV) and the IACUC Chair shall assess the concern to determine whether the concern falls within the IACUC's jurisdiction. If any of these individuals have a potential conflict of interest, they will recuse themselves from this assessment.

**379.1.1** If the IACUC Director, the AV and the IACUC Chair determine the concern does not fall within the IACUC's jurisdiction, the matter shall be referred to the appropriate office/unit at Emory.

**379.1.2** If the IACUC Director, the AV and the IACUC Chair determine the concern does fall within the IACUC's jurisdiction, they shall determine whether the matter must be addressed immediately (as in the case of animals reported to be in immediate jeopardy), should be forwarded to the Noncompliance Investigation Subcommittee (NCIS) for review, or whether to appoint a team to investigate the concerns. The Office of Compliance shall be allowed to participate in any fact- finding it deems necessary and is available to the IACUC as a resource in all cases.

**379.1.2.1** Should an animal welfare matter require immediate response, the IACUC director and IACUC chair should contact the attending veterinarian or designee, who is authorized to halt any activity until assessments can be made.

**379.1.2.2** A matter involving criminal activity or human safety should be reported promptly to the institution's law enforcement or occupational health and safety officials.

**379.1.2.3** Should an investigative team be required, the IACUC Director and the IACUC chair will appoint members of the team, which will include personnel with relevant expertise and lacking conflict of interest. Personnel with conflicts of interest must disclose them and refrain from participation in the investigation. The determination of the need for a specially appointed investigative team may be based on a number of factors including, but not limited to, the complexity of the issue involved or the potential scope of the concern. The investigation team shall operate as independent fact-finders on behalf of the IACUC and provide an objective review of concerns.

**379.1.3** The IACUC director shall notify in a timely manner the relevant laboratory/unit/school regarding the whistleblower concern and IACUC investigation. The IACUC director will request that the unit cooperate with the investigation.

**379.1.4** Whistleblowers may make allegations anonymously and request that anonymity be preserved throughout the investigation (see Policy 306 Whistleblower). In these cases, the IACUC and the investigation team will take



reasonable steps to keep the whistleblower’s identity confidential. Any concerns about possible retaliation raised by the whistleblower shall be reported to Human Resources.

**379.2** If an investigation team is appointed, the team members shall:

**379.2.1** Interview relevant witnesses (including but not limited to those reporting the incident (where possible), personnel of the relevant school/unit associated with the subject of the concern, pertinent experts in the topic at hand, etc.).

**379.2.2** Review relevant records including, but not limited to, protocol, procedure-related logs, monitoring logs, etc.

**379.2.3** Inspect any facilities involved in the concern if and as needed.

**379.2.4** Prepare a written report describing the team’s findings and outlining any recommended actions.

**379.3** The investigative team shall present the report at a convened meeting of the IACUC for review, discussion, and deliberation. The IACUC has the responsibility for determining further action, if any, to be taken.

**379.4** Where possible, once the IACUC has reviewed the report and formal response (if applicable), the IACUC director or their designee shall notify the whistleblower that the issue has been reviewed and resolved. If the allegations were made anonymously through the Trust Line, the IACUC director may seek the assistance of the Office of Compliance with any communications.

Appendix list: None

**Contact Information**

Subject	Contact	Phone	Email
Clarification of Policy	Office of Research Compliance and Regulatory Affairs - IACUC	404-712-0734	<a href="mailto:iacuc@emory.edu">iacuc@emory.edu</a>

**Revision History**

- Version Published on: 06/30/2022
- Revisions: 06/05/2019