Research Compliance and Regulatory Affairs Research Administration

Animal Research Recording & Surveillance Policy for Emory University Division of Animal Resources

Responsible Official: Research Administration

Administering Division/Department: Research Compliance and Regulatory Affairs

Effective Date: 10/05/2023

Last Revision Date: 10/05/2023

Overview

Emory University is committed to safeguarding the health and welfare of laboratory animals used in EU animal facilities and research laboratories, the integrity of experiments, and the interests of the university.

The Guide for the Care and Use of Laboratory Animals (8th Ed. 2011) ("the Guide") provides guidelines for institutions regarding the environment, housing, and management of laboratory animals used or produced for research, testing, and teaching.

The purpose of this policy is to describe conditions when photography, video recording, audio recording, and or surveillance activities are permitted within Emory University's Division of Animal Resources (EU DAR). Photography, video recording, audio recording, and or surveillance activities of animals and animal facilities is allowed only for purposes directly related to the corresponding approved IACUC animal use protocol, veterinary care, and or at a regulatory agency's request. Images and recordings require approval by EU DAR and Research Administration offices and must only be used for scientific purposes and are not intended for sharing with external collaborators. If there is need for sharing with external collaborators, please contact the RCRA Office.

Scope

This policy allows the taking and use of photographs, video recording, audio recording, and or surveillance activities for the purposes of internal EU use and is not intended for sharing with external collaborators.

The attestation document included with this policy should be signed by all parties included to obtain approval for recording and or surveillance from the EU DAR and Research Administration offices before the activity can be initiated.

Contact Information

| Subject | Contact | Email |
|-------------------------|---|------------------------------|
| Clarification of Policy | Office of Research Compliance and Regulatory Affairs | researchcompliance@emory.edu |

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Animal Research Recording & Surveillance Attestation

This attestation outlines conditions for recordings within Emory University Division of Animal Resources (DAR) and applicable in approved research laboratories. This attestation is limited to:

| Principal Investigator: | |
|--|--|
| Designee name: person who will be taking the recording/conducting the surveillance | |
| Protocol numbers: approved protocol numbers where animals are assigned for research | |
| Protocol Amendment: if the protocol needed modification for recordings | |

The use of any recording device to record sounds or images of animals or animal use areas is allowed by Emory University when performed:

- by the Principal Investigator (PI) or designee
 - o and is required for IACUC approved, scientifically justifiable reasons.
 - for the purpose of recording for research instructional activities as described in the IACUCapproved protocol.
- by, or at the direction of, the Attending Veterinarian (AV) for diagnosing or documenting clinical disease, veterinary care, or treatment.
- by compliance personnel (on RCRA team) when required to document condition of facilities, compliance, or animal welfare issues.
- by external inspectors, such as with the USDA, OLAW, AAALAC, who have a regulatory or
 accreditation-related need to visit or inspect animal care activities and facilities. These inspectors are
 permitted to capture photographs, video recording, audio recording, and or surveillance activities as
 they determine appropriate*. When inspectors capture visuals and/or audio, Emory personnel should
 be aware of what is being recorded and or request copies of the same. DAR and/or RCRA should be
 contacted whenever laboratories are coordinating a visit with an external inspector, entity, or agency,
 or when inspectors arrive for unannounced inspections.
 - *Visuals or audio added to regulatory files should connect to potential non-compliance issues or adverse events issues; other visuals or audio should be deleted. In some cases, inspectors may request visuals/audio for training purposes.

PI assures attestation is allowable as outlined by at least one of the criteria above and agrees to comply with responsibilities listed below:

 All procedures and equipment in the recordings have been described in the approved IACUC protocol for that species of animal.



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- Images and recordings are limited to those directly related to research and the state or progression of the animal model system
- The surroundings of the location where the images are captured should be clean.
- Persons identifiable from the images must provide their consent to be pictured and additional specific
 consent if the image is distributed in any public format. See Emory Communications form:
 https://communications.emory.edu/ includes/documents/sections/consents-releases/epv-photorelease-form.pdf
- Personnel included in the images must wear facility-approved personal protective equipment (PPE) and show proper handling and restraint techniques.
- For video recording or audio recording conducted remotely, remote access must be conducted via Emory's Virtual Private Network (https://it.emory.edu/security/vpn.html)
- All removable storage devices containing photographs, video recording, audio recording, and or surveillance activities of animals will be kept in a secure, locked area with access limited to only designated EU personnel.
- Computers with recordings will be password protected.
- Copies of recordings will not be made unless permitted by PI.
- Recordings will be maintained in accordance with Emory's record retention policy and research sponsor requirements, and destroyed securely when no longer used for research.
 [Emory Policy 5.21 Records Management and Record Retention for Research https://records.emory.edu/documents/research.pdf]
- Photography, video recording, audio recording, and or surveillance activities of research animals must not be posted to any type of social media, including laboratory websites, unless expressly permitted in writing by DAR, Research Compliance Officer and /or Institutional Official (IO).
- Images and recordings must not be distributed to members outside of the PI's laboratory except for scientific use as described above.
- External personnel to Emory University complete the IACUC Confidentiality and Non-Disclosure Agreement. Contact iacuc@emory.edu to request the agreement.
- Recordings must not be saved to personal devices.



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| I have read, understand and will comply with the requirements outlined above |
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| PI Name: |
| Signature: Date: Department: |
| Approvals: |
| Attending Veterinarian Name: |
| Signature Date: Emory University Division of Animal Resources |
| Associate Vice President, Research Compliance & Regulatory Affairs Deepika Bhatia, MSBME, CCRP, CHRC, CHPC, CCEP |
| Signature: Date: Emory University Office of Research Administration |