

Responsibility and Accountability

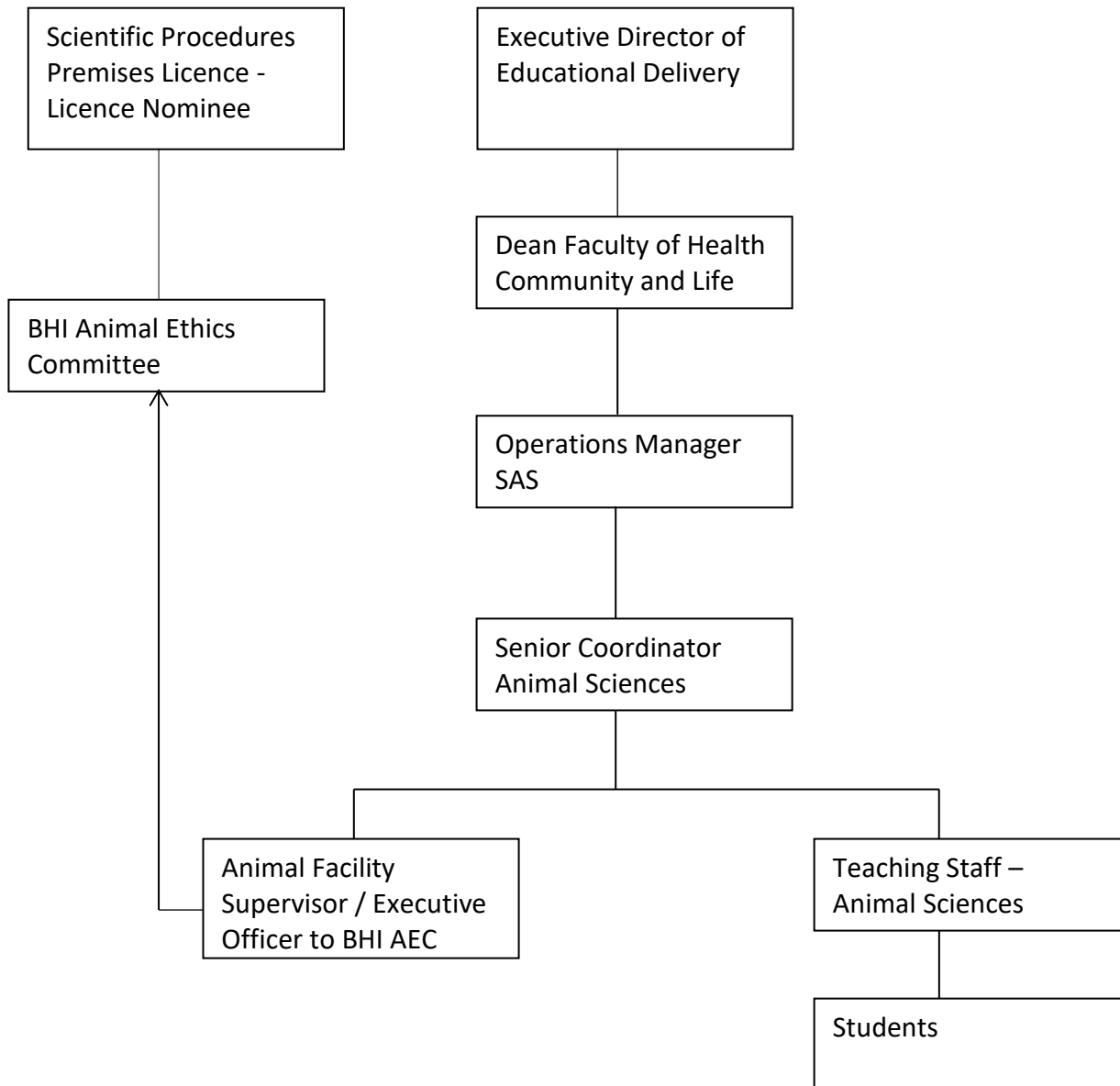


DIAGRAM 3 – ORGANISATIONAL STRUCTURE

Complaints Management

In the event of a complaint arising from a project being undertaken by BHI SAS either from any person or group, including investigators, animal carers, and animal ethics committees (AECs), AEC members, students, employees of the institution and members of the public, the complaint must be recorded. Complaints may relate to the activities of any party or person involved in the care and use of animals, including investigators, animal carers, and the AEC and governance officials.

BHI SAS must give priority consideration to the wellbeing of animals and ensure that activities with potential to adversely affect animal welfare cease immediately.

Complaints relating to the care and use of animals for scientific purposes may stem from:

- (i) Issues concerning the care and use of animals by the institution
- (ii) Issues concerning the AEC process of review of an application or report, including resolution of disagreements between AEC members, between the AEC and investigators, and between the AEC and the institution
- (iii) Issues concerning the process for independent external review
- (iv) Issues associated with non-compliance with the Code by any party or person involved in the care and use of animals including investigators, animal carers, the AEC, governance officials, and external parties. Non-compliance may also involve breaches of relevant state or territory legislation, and institutions should have procedures for advising regulatory authorities (Refer Section ... Non-compliance of the Manual)
- v) Conscientious objection of staff or students in the case of teaching activities involving the care and use of animals. This may relate to the undertaking of specific procedures, competencies or whole courses.

All complaints are recorded in such a way to ensure that an appropriate person receives, logs, tracks and responds to complaints within a specific time-scale. The complaint record identifies:

- The complainant
- The nature of the complaint
- The date and time that the complaint was received
- The method by which the complaint was received (telephone, letter, fax, e-mail, face to face contact)
- The proposed action to resolve the complaint
- The person or persons responsible for responding to the complaint
- The target date for resolution of the complaint
- Confirmation of the proposed action having been taken and the date of confirmation
- Confirmation of contact with the complainant to describe the action taken and that the complainant has expressed satisfaction with the action taken and the date of contact
- Sign off by the Animal Facility Supervisor that the complaint has been satisfactorily resolved.

An initial response to all complaints is provided within 24 hours and a detailed response provided within 10 days. Complaints that cannot be easily resolved by Animal Studies personnel are passed on to the Executive Director of Education Delivery for resolution.

It is the responsibility of the Executive Director of Educational Delivery to ensure that:

- (i) Where complaints relate to activities that have the potential to adversely affect animal wellbeing, the activities cease immediately
- (ii) Where complaints relate to activities that would normally require AEC approval, the complaints are referred to the AEC to investigate whether such activities are conducted in accordance with AEC approval

- (iii) Where complaints raise the possibility of 'research misconduct', as described in the Australian code for the responsible conduct of research, the complaint is handled in accordance with procedures specified in that document
- (iv) where complaints allege misconduct that falls outside the range of 'research misconduct', as described in the Australian code for the responsible conduct of research, the complaint is handled in accordance with BHI's SAS processes for dealing with other forms of misconduct.
- (v) Where complaints relate to the operation of the AEC itself, the complaint is referred to the license nominee. It is the responsibility of the license nominee to ensure that the complaint is resolved in accordance with BHI procedure. The license nominee must ensure that the operation, composition and conduct of the AEC maintains its compliance with the Australian Code.

Where complaints cannot be resolved by communication between the complainant and BHI SAS, BHI SAS should ensure that the complainant has access to a person or agency external to the Institute for resolution of the complaint.

A summary of complaints received and resolved are tabled at meetings. The Animal Facility Supervisor keeps a summary record of complaints to analyze the types and frequency of complaints. This information is used for reporting purposes, to review and, if necessary, modify work practices or provide additional training.

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The Licence Nominee

An individual must be nominated to be responsible for procedures under a Scientific Procedures Premises Licence - the "Licence Nominee". The Licence Nominee is the first point of contact for the Department of Economic Development, Jobs, Transport and Resources (DEDJTR) as the licensing authority, and will be corresponded with on all matters relating to the licence, such as breaches of licence conditions, licence audits, reporting of animal use, and Animal Ethics Committee composition and conduct. This person must hold a position in the licensed institution such that they are familiar with the work being conducted, yet senior enough to be able to effect change where necessary.