

Procedure for Managing Complaints Related to Animal Research

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Approved by:	Director and CEO

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1 PURPOSE AND SCOPE

1.1 Purpose

The purpose of this procedure is to ensure appropriate investigation of and response to any complaints received relating to the use of animals for scientific purposes at the Institute or a collaborating institute.

These procedures are required to ensure compliance with section 5 of the Animal Research Code and are made pursuant to the Institute's Policy on Use of Animals for Scientific Purposes.

1.2 Scope

This Procedure applies to all Personnel and describes processes for:

- a) managing complaints concerning the care and use of animals at the Institute;
- b) managing complaints concerning the AEC process of review of an application or report; and
- c) managing complaints involving research conducted at more than one institution.

2 DEFINITIONS

AEC	QIMR Berghofer Animal Ethics Committee
AFM	Animal Facility Manager
Animal Care and Protection Act and Regulations	<i>Animal Care and Protection Act 2001</i> (Qld) and <i>Animal Care and Protection Regulations 2012</i> (Qld)
Animal Research Code	The Australian Code for the Care and Use of Animals for Scientific Purposes, (8th Edition 2013) and as amended.
AWO	Animal Welfare Officer being the Veterinary Services Manager
Council	The Council of the Queensland Institute of Medical Research continued in existence by section 6 of the QIMR Act 2025
DAF	Department of Agriculture and Fisheries
Institute	QIMR Berghofer Medical Research Institute
Investigator	Any person who uses animals for scientific purposes. Includes researchers, teachers, undergraduate and post-graduate students involved in research projects.
PAMO	Post Approval Monitoring Officer
Personnel	All Institute employees, volunteers, Council Members, Animal Ethics Committee and Sub-Committee Members, students, Visiting Scientists, Honorary Scientists, Emeritus Scientists and tenants using the Institute's animal facility.

PI	Principal Investigator being the investigator identified in an animal research ethics project application as having ultimate responsibility for the use of animals for scientific purposes in that project.
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3 PROCEDURE

3.1 Summary of Roles and Responsibilities

AEC	<p>Considers all complaints brought to its attention.</p> <p>Authorises immediate cessation of activities pending investigation if the allegation is considered to be of a serious nature.</p> <p>Orders the appropriate remedial action.</p> <p>Refers the matter to the Institute to be managed in accordance with the Institute's other policies and procedures as outlined in section 4 of this Procedure.</p>
AEC Chair	May receive the complaint. May review the complaint and determine if it is of a serious nature.
AEC Secretariat	Provides administrative support to the AEC and ensures all decisions made under this procedure are appropriately recorded.
AWO	May receive or initiate the complaint. May be involved in the investigation of the complaint.
Complainant	Provides a written statement, where possible, giving as many details as possible. Co-operates with the investigation process as required.
Deputy Director	Reviews a complaint relating to AEC processes. Receives complaints from Investigators dissatisfied with the AEC processes.
PAMO	The PAMO is responsible for investigating complaints on behalf of the AEC.
PI	<p>Principal Investigator takes ultimate responsibility for the AEC approved project.</p> <p>Co-operates fully with complaint investigation. Implements any required process changes.</p>

3.2 Complaints relating to care and use of animals at Institute

Any Personnel concerned about the care and use of animal at the Institute can make a complaint under this Procedure. Where possible, the PI responsible for the animals should first be made aware of the concerns and be given an opportunity to act. Where this is not possible or has not resulted in the issue not being resolved, the process outlined below must be followed.

- a. The complaint should be in writing to the AEC Secretariat and should include as much detail as possible, such as the date and nature of the event resulting in the complaint. The complaint should indicate whether the PI has been made aware of the concerns related to the care of

animals prior to the complaint being made. If the PI has not been made aware, the reasons for this should be included in the complaint.

- b. Any Personnel who submit a complaint will have confidentiality maintained, to the extent possible, and will not be disadvantaged.
- c. Upon receiving a written complaint, the AEC Chair and/or Deputy Chair will review the complaint within 2 business days and determine if it is of a serious nature. If so, the AEC may require some or all research activities to be suspended pending investigation of the complaint.
- d. Any complaint received concerning the care or use of animals must be appropriately investigated as soon as is reasonably practicable and, if necessary, corrective action taken with the assistance of the AWO where appropriate.
- e. The AEC will consider the complaint in light of all relevant information made available to it including any existing applications, approved projects or reports prepared by PI's and any other relevant documentation supplied to the AEC.
- f. If the AEC requires additional information from any of the Personnel identified in the complaint to determine the nature of the complaint, a request will be made to the PAMO to collect further information and a response must be provided to the AEC within 3 business days of the request being made.
- g. The AEC will manage the complaints as follows:
 - i. If the complaint relates to a potential unexpected adverse event, the AEC assess the matter in accordance with the Procedure for Managing and Reporting Adverse Events in Animal Research;
 - ii. If the complaint relates to a potential non-compliance, the AEC will assess the matter in accordance with the Procedure for Managing Non-compliance in Animal Research;
 - iii. If the complaint is not related to the requirements of the Animal Research Code, the AEC will refer the complaint to the Deputy Director for appropriate consideration under the Institute's relevant policies. Refer to part 4 of this Procedure for further details.
- h. While a complaint can be made anonymously by referring the concerns to the AEC Secretariat through the Institute's internal mail, it is preferable that complaints are made in writing. Anonymous complaints are difficult to investigate effectively as additional information cannot be sought and the complainant cannot be advised of the progress. Nevertheless, if a complaint is made anonymously, all reasonable efforts will be made to investigate the issues raised in accordance with this procedure.

3.3 Complaints about an AEC Process

Investigators dissatisfied with AEC processes may make a complaint to the AEC Secretariat/ Research Office in writing and should include as much detail as possible in the complaint. If such a complaint is made, the following procedure will be followed (outlined in Attachment 1):

- a. The AEC Chair or delegate will be informed of the complaint and will discuss the matter directly with the Investigator. If the matter is resolved, the outcome will be reported to the next AEC meeting.
- b. If the matter is still not resolved, the Investigator will be invited to a regular or out of session AEC meeting. If the matter is resolved, the outcome will be reported to the next AEC meeting.
- c. If the matter is still not resolved, the issue will be forwarded to the Deputy Director for review.
- d. The Deputy Director will review the complaint in light of all the evidence made available by the Investigator and the AEC.
- e. Following this review, the AEC may need to review its process in reaching its decision regarding the application or report and re-evaluate its decision in light of the reviewed process. However, an AEC's decision on the ethical acceptability of an activity in the Institute lies with the AEC and cannot be overturned.

In the event that the complaints about AEC processes indicate patterns of decision making or areas of concerns relating to the AEC processes that are not consistent with the objectives of the Animal Research Code, the Deputy Director will be responsible for liaising with the AEC Chair and reporting such concerns to the Council for consideration and action.

3.4 Complaints involving research conducted at more than one institution

If a complaint relates to work at an external organisation, the AEC of that external institution (External AEC) must be informed of the complaint.

It is the responsibility of the animal ethics committee with oversight of the project or animals under the scientific premises license to investigate the complaint. The AEC Secretariat will advise the External AEC of the complaint in writing and request a report of the outcome of any review of the complaint for the information of the AEC.

If an outcome is not received from the External AEC in relation to the complaint, the matter will be referred to the Deputy Director for further action.

3.5 External review of unresolved complaints

If a complaint remains unresolved after these procedures have been followed, the Deputy Director or the complainant may refer the complaint for external review. The Deputy Director will assist with identifying a suitable external individual or agency to review the complaint depending on the nature

of the complaint. If the complainant refers the matter for external review, a copy of the complaint should be provided to the Deputy Director.

4 REFERRAL OF COMPLAINTS

The Institute has a broad range of responsibilities with respect to research with animals. Accordingly, a complaint may give rise to legislative or contractual requirements to report the allegations or the outcomes of any complaints to other parts of the Institute or to external bodies. In such cases, the Institute will proceed to make notifications or refer complaints, as required. For example:

- a. Where complaints raise the possibility of 'research misconduct', the complaint will be referred to the Integrity Office for review in accordance with the Institute's Policy on the Responsible Conduct of Research and Research Misconduct.
- b. Where complaints allege misconduct that falls outside scope of responsible conduct of research, the complaint will be referred to the Human Resources Department for the complaint to be handled in accordance with the Institute's Misconduct and Serious Misconduct Policy.

5 COMMUNICATION AND REVIEW

The AEC or Institute will ensure that all parties, including the complainant, are informed of the progress of a complaint and the outcome, as appropriate.

All communications by the AEC will be documented in AEC Minutes, including any decisions made by the AEC.

6 RELATED DOCUMENTS

- Policy on Use of Animals for Scientific Purposes
- Procedure for Managing and Reporting Adverse Events in Animal Research;
- Procedure for Managing Reports of Non-compliance in Animal Research;
- Misconduct and Serious Misconduct Policy
- Policy on the Responsible Conduct of Research and Research Misconduct
- Procedures for Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research

7 CONTACT OFFICERS

Deputy Director – ext. 3177.

General Manager Research Governance and Funding – ext. 3197.

8 AMENDMENT HISTORY

Amendment History			
Version	Date endorsed by AEC	Date due for review	Date due for renewal
1	24 March 2022	1 March 2025	28 April 2025
1	Administrative amendments (QIMR Act 2025) approved by Institute Secretary 17 December 2025	28 April 2025	28 April 2025