

DELIVERING EFFECTIVE ETHICAL REVIEW:

The AWERB as a 'forum for discussion'



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Introduction

Animal research in the UK is regulated by the Home Office via the Animals (Scientific Procedures) Act 1986. The Animal Welfare and Ethical Review Body (AWERB), required at each research, breeding and supplying establishment, is an important part of this governance system. The AWERB has a number of tasks. One of these is to *'provide a forum for discussion and development of ethical advice to the establishment licence holder on all matters related to animal welfare, care and use at their establishment'*¹.

The aim of this booklet is to provide guidance, ideas and examples to help AWERBs fulfil this specific task, and to help ensure that ethical issues are acknowledged and discussed whenever they arise. The content may also be useful to those interested in animal research policy and governance. A list of practical suggestions is provided in summary tables of *Action Points* in section 6.

The material presented here is based on the results of an event, jointly organised by the RSPCA, Institute of Animal Technology, Laboratory Animal Science Association and Laboratory Animal Veterinary Association and held in London in May 2016². This event included a workshop session on 'The AWERB as a forum for discussion', where AWERB members from industry and academia shared their experiences of implementing this task. Additional material has been taken from the Guiding Principles on Good Practice for AWERBs³, the RSPCA Lay Members' Resource Book⁴, and from wider literature.

The workshop on 'The AWERB as a forum for discussion' was chaired by Dr Pru Hobson-West (University of Nottingham) and Dr Penny Hawkins (RSPCA Research Animals Department). It was partly funded by the University of Nottingham via an Economic and Social Research Council (ESRC) Impact Accelerator Award to the chairs, which also funded the printing of this booklet. The aim of this Award is to encourage impact for social science: whilst scientific research provides key evidence, for example on replacement, reduction and refinement (3Rs), social sciences can help understand the 'social, economic and cultural processes' that enhance or impede laboratory animal research and governance⁵.

1 AWERB as a 'forum for discussion'

Home Office Guidance¹ lists the 'minimum' and 'additional tasks' of the AWERB. The minimum tasks relate to Article 27 of the European Directive that regulates animal care and use^{6,7} and cover activities such as providing guidance on animal welfare and the application of the 3Rs. Additional tasks can also be advised by the Secretary of State. One such task is acting as a *'forum for discussion and development of ethical advice to the establishment licence holder'*. But what does this mean in practice?

In 2015 the RSPCA and LASA jointly issued Guidance that provides more detail. They explain that *'Providing the opportunity to raise and discuss ethical issues is a vital part of the AWERB's role in promoting a culture of care'*. The document goes on to stress that AWERBs should *'be alert to the wider ethical and legal issues arising from the use of animals, both within the establishment and beyond'*; and *'encourage staff to be aware of these issues and consider the implications for their own work'*³. This role is important, not only to comply with the Home Office guidance, but also because public support for animal research is conditional on effective governance^{5,8}. The remainder of this booklet goes on to offer practical suggestions of how to maximise this key AWERB task.

2 Current experiences of AWERB members

At the event in 2016, 21 participants attended the workshop on the AWERB as a 'forum for discussion'. Individuals held a variety of positions including Named Veterinary Surgeon, other Named Persons, scientist, AWERB chair and lay member.

The workshop involved general discussion of the structure of AWERBs at different institutions, and how this structure impacts on practice. Topics included how tasks are carried out, how meetings are structured, and who attends. Differences between AWERBs were often highlighted with respect to how effectively they fulfil the 'forum for discussion' task. For example, some participants argued that this partly depends on how busy the AWERB is; in particular, how much time is available to spend on activities other than licence application review. Some participants felt that their AWERB is fulfilling the discussion function well, and gave several examples of good practice.

Experiences of good practice

These can be summarised under the themes of 'structure' and 'engagement'. In terms of *structure*, participants were particularly keen to compare experiences across AWERBs. Some were supportive of a system where sub-committees were used alongside the main AWERB group, in order to alleviate the workload pressures of the main committee. This was reported to be a workable solution for some; others expressed concern that delegation of tasks could lead to the *perception* that ethics can be split off from the main business of the board. Finally, participants focused on mechanisms to encourage wider participation, for example by having a rota for all scientists to attend AWERB meetings.

In terms of *engagement*, examples were given of institutions having a dedicated AWERB web page, open to everyone within the establishment, including minutes, a Q&A section, or in-house social media. Others explained how their AWERB initiated and hosted talks and discussions about the wider issues of animal care. Another participant argued for the opening up of AWERB meetings to anyone in the establishment, so that meetings themselves become a focus of discussion across the institution. More specifically, some AWERB members suggested topics for wider debate, such as what level of harm would be permissible for a particular purpose. Others suggested the importance of having talks from non-scientists, so that wider questions of welfare or ethics can be debated.

Experiences of obstacles or challenges

The primary obstacle identified regarding implementing the 'forum for discussion' task was lack of resources and time in particular. Attendees agreed that a great deal of time is taken up with working through project

licence applications, which poses a challenge for AWERBs in fulfilling their full list of functions. For example, some participants argued that ideally scientists should be questioned by the AWERB about the wider ethical aspects of their work. However, in practice this is time consuming. Others focused on the way in which wider academic pressures impact on this issue: if AWERB membership is not perceived by managers or others as 'core' to the job, then this adds to the feeling of time and resource pressure. Despite these challenges, participants gave concrete suggestions for positive ways forward. These will be highlighted in later sections and summarised in a table of *Action Points* on page 8.

Shared experiences?

The results of this workshop raise the question of the extent to which these experiences are shared more widely, and whether this is consistent with the experiences of all AWERBs nationally. More detailed research on this question would be useful. Indeed, a recent engagement exercise led by social scientists and involving a wide range of stakeholders identified key priorities for future research. One of these was '*What factors shape the format, content and communication of decision-making in the ethical review of animal research in different contexts*'⁶. A greater understanding of the different experiences of AWERB members would be one important dimension of this, especially given the relative lack of social scientific research on the topic of ethical review⁹, and animal research governance more widely¹⁰.

The following sections concentrate on suggestions for ways forward, and refer to examples raised by the AWERB workshop participants. The discussion is divided into three sections which, in practice are highly interrelated: *Improving the 'quality' of ethical discussion*; *Widening engagement across the establishment*; and *Encouraging openness beyond the institution*.

3 Improving the 'quality' of ethical discussion

If the aim is to *provide a forum for discussion and development of ethical advice*, what precisely does *ethical* mean in this context? Thinking about ethics puts the focus on what *ought* to be done in a given situation. A classic definition of ethics is '*What should I (we) do, all things considered*'¹¹. In this case, considering 'all things' could include promoting good science and supporting those engaged in research, while also critically challenging claims made around necessity and justification. It would also require full implementation of the 3Rs, consideration of the wider ethical implications of the research, and working to minimise harms to animals.

The question of resource

Participants in the AWERB as a 'forum for discussion' workshop were not asked to define ethics, nor 'ethical advice'. However, the discussion did implicitly relate to the question of *quality*. In short, several participants described a high workload for the AWERB which left less time or energy for consideration of the wider ethical issues. As noted in section 2 above, participants raised this as a challenge, but also offered concrete suggestions for improvement, such as devolving specific tasks to sub-committees. Other suggestions included establishing a programme for scientists to give presentations about the 3Rs, or wider implications of their work, to animal technologists and care staff, and vice versa. Many of the suggestions were around creating time, for example by appointing more individuals to the AWERB, or by freeing up academics' time through the provision of teaching replacement cover.

During discussion, participants made clear their awareness that such changes would require a degree of financial resource, but expressed the view that the measures would be a worthwhile investment because of the potential benefits to science, welfare and public accountability, and because they may help to prevent future ethical or welfare problems. What this discussion reveals is that ethics should not be viewed as abstract or 'high level', but often has very real world, practical implications. What is also important to note is that questions of resource, and the way in which administrative systems are perceived as preventing other activities is *not* a topic confined to AWERBs. Indeed, previous Wellcome Trust-funded research with laboratory animal scientists¹⁰, and wider academic work¹², has identified that, while some researchers welcome the project licence application process as a prompt to reflect upon their work, others regard the paperwork involved in research governance as challenging.

Asking in-depth ethical questions

Leaving aside the question of resource, there is also the challenge of how to ensure that in-depth questions are raised. This issue was not discussed during the workshop but has been covered in wider reports. For example, it has been argued that in order to address ethical goals such as reducing and avoiding severe suffering we need to raise questions that ‘*challenge ethical assumptions underlying harm-benefit discussions*’^{13,14}. Questions that could be asked under this theme include: if a particular use of animals is said to be ‘necessary’, what exactly does that mean¹³? Is it better to use some species rather than others in research and, if so, on what grounds do we grant some species greater ethical status than others? Can an economic or career benefit ever form part of a justification for using laboratory animals⁴?

Page 51 of the RSPCA/LASA *Guiding Principles*³ also sets out useful examples of topics that could be discussed within AWERB meetings or more widely. The full list cannot be reproduced here, but questions include: whether the establishment wants to rule out certain procedures or the use of certain species; how to develop policies for collaboration with colleagues overseas; and exploration of how ‘research integrity’ issues relate to animal use. These questions are varied, but what unites them is a focus on the wider social context of animal research, and a commitment to discussing the underlying ethical assumptions involved in policies and practice. This strongly suggests that ethical discussion needs to go wider than the 3Rs¹⁶.

Such questions are not easy to answer but, crucially, some may consider them *difficult to even raise*. What is therefore required is an atmosphere of trust, with the ultimate goal that the AWERBs can function as a kind of ‘safe space’¹⁷, where individuals feel sufficiently comfortable to raise and respond to difficult questions. In practice, it will sometimes be difficult to separate ‘ethical’ and ‘practical’ issues¹⁰, but this does not remove the need to provide opportunities to improve the quality of the ethical discussion. Indeed, it may also be helpful to ensure that certain AWERB staff act as ‘ethics champions’, and are sufficiently confident to raise some of these difficult questions. Likewise, it is also important to appoint strong chairs, with the skills to create supportive, inclusive environments that enable open and forthright discussion³. Finally, it may also be useful to consider ways beyond committee activities, to try and encourage scientists to engage in their own ethical reflection¹².

4 Widening engagement across the establishment

One key route to ensuring that AWERBs successfully act a ‘forum’ is to create opportunities for wider engagement with other staff across the establishment, including scientists who use animals and wider members of the institution.

Encouraging participation

Some of the 2016 workshop participants claimed that their institution already did this well, whereas others highlighted room for improvement. Positive examples provided by participants included the production of an AWERB electronic message board or webpage, visible to all members of the institution, with lists of meeting dates, conference posters and presentations, and organised talks open to all. Others suggested opening up AWERB meetings to anyone within the establishment, so that the meetings themselves become a focus for discussion. Some suggested that AWERBs organise invited talks, where members of the institution who have a general interest in animals (not necessarily research animals) could share their perspectives.

Prioritising topics for discussion

Other concrete suggestions for engagement have also been made in wider documents and literature. For example, the RSPCA/LASA Good Practice Guidelines and the RSPCA Lay Members’ Resource Book have suggested that the AWERB host workshops, with the aim of exploring animal care and welfare, or to discuss whether certain procedures should not be conducted at all. These workshops could be discussion based, or more hands on, where new techniques or products which have welfare gains could be demonstrated. Another suggestion is to lead staff consultations, where views are sought on how to deal with matters of specific concern². The impetus for a consultation could be the production of a new report, for example the recommendations set out in the Brown Report¹⁸ and the ‘identification and management of patterns of low-level concerns’¹⁹.

As is the case with improving the 'quality' of ethical discussion discussed above, it is important to recognise that these kinds of engagement activities also require the investment of time and resource and, often, administrative and other support. However, as was noted by a workshop participant, such investment may be worthwhile if future problems are avoided. The Named Information Officer and/or Named Training and Competency Officer are arguably well placed to organise such events, but there may be others in the establishment who would be keen to take the lead or contribute in other ways. Given diary pressures on many staff, it may also be helpful to provide specific incentives for participation or engagement, such as CPD credits, refreshments, or providing support for staff to publish on the wider welfare or ethical dimensions of their research (see AWERB-UK Meeting Summary²).

5 Encouraging openness beyond the institution

The Home Office Guidance to the Animals (Scientific Procedures) Act 2014¹ explains that, whilst protecting confidentiality, it may be appropriate to share some of the outputs of the AWERB in the wider community, to promote awareness of the AWERB's activities. The 2016 AWERB-UK workshop considered how establishing a discussion forum within the establishment related to the openness agenda, as many participants came from facilities that have signed the *Concordat on Openness on Animal Research*²⁰.

Contrasting experiences of openness

Participants reported mixed experiences on this question. Some had been able to set up public engagement and outreach programmes, including hosting visitors to the facility, whereas others had not been able to share information on animal use even within their own organisations. Between these two extremes, AWERB members reported they had been able to discuss some issues associated with animal use within their establishments, but this was not extended to the full range of species or procedures.

A few participants expressed the view that more experienced (or older) staff may have different views on the value of transparency than more junior (or younger) staff. Published research on this question is currently lacking, and a priority is therefore to consider how moves towards open data and transparency are influencing 'research design and practices'⁵, and whether the high hopes for transparency, such as improving public trust in science²¹, are actually experienced or shared at a *local level*. In the meantime it is interesting to note that studies beyond animal research suggest that some scientists regard openness as an 'overhyped ideal'²². This view may or may not be shared in the animal research domain.

Resource and management support

The question of workload was once again raised by participants in the workshop, with some individuals arguing that facilities can engage with the public more confidently and in more depth, if adequate resources have been put into local ethical review. Others argued that effort should be directed to ensuring that senior management and communication departments in UK Universities are supportive of openness as, without this, local AWERB initiatives may have less success. This observation about the caution of some Universities is supported by web based research²¹, although more research on regional based differences would be useful.



6 Action points

These tables summarise the practical suggestions discussed by participants in the AWERB workshop, by key reports, and in the wider academic literature. Each table mirrors the main sections in this report, and gives examples of Action Points to help achieve the broad aims.

Improve the 'quality' of ethical discussion

- Maximise time for ethical discussion, e.g. by delegating tasks to sub-committees, which report back to the main AWERB.
- Ask scientists to give presentations on their work, including its wider ethical aspects, to the AWERB.
- Appoint more members to the AWERB to reduce individuals' workload and increase time for detailed ethical discussions.
- Provide teaching replacement costs to free up academics' time to promote full and active participation.
- Identify 'ethics champions' who can raise the difficult *underlying ethical questions*; ethics should go beyond the important topics of the 3Rs and animal welfare.
- Appoint strong AWERB chairs, able to create an atmosphere of trust and participation so that challenging issues can be raised.
- Share and discuss this document with AWERB members, and your AWERB Hub, and devise your own Action Points, with milestones. Keep all members informed and engaged with this process.

Widen engagement across the institution

- Produce a webpage or message board to promote activities and talks open to all. Postings to the board could be made anonymous.
- Make AWERB meetings open to all staff across the institution to increase awareness and involvement.
- Organise talks from staff across the institution on difficult or controversial topics, in order to bring in new ideas from those with different backgrounds.
- Organise workshops on animal care and welfare, including interactive events, to attract those with animal experience but with fewer existing links with the AWERB.
- Lead staff consultations, e.g. on ethical issues raised by new reports or publications; all staff are members of the Institution and part of its culture, and are therefore indirectly linked to its animal use.
- Provide incentives for participation in events, such as CPD credits, refreshments or help with publishing.
- Share this document with wider members of the Institution and encourage discussion of the Action Points. This may help identify individuals outside the AWERB who are willing to contribute in particular ways.

Encourage openness beyond the institution

- Establish a public engagement and outreach programme, including benefits, harm and limitations of research, and how ethical issues are addressed locally.
- Organise visits to the animal facility, whilst ensuring that welfare and science will not be compromised.
- Consider whether your institution is less willing to be open about certain species or procedures and, if so, critically discuss the ethical justification for this.
- Organise a regional discussion, e.g. via the AWERB Hub, about different institutional approaches to openness and potential joint initiatives.
- Seek involvement and support from senior management and communication teams regarding the importance of openness.
- Start a frank discussion on the aims of openness, and monitor whether and how openness initiatives actually achieve these aims.
- Try to ensure that sufficient resources (including energy and time) are available for openness initiatives by adopting some of the practical suggestions made in this booklet.



7 Next steps and acknowledgments

Feedback on this report, and examples of what has worked well at individual establishments, would be very welcome at research.animals@rspca.org.uk. The RSPCA and other stakeholders are planning to organise further AWERB focused events to explore these issues in more detail, and to consider experiences of wider AWERB tasks.

The Animals in Science Committee has set up a network of designated regional AWERB 'Hubs' to facilitate communication and sharing of good practice between UK AWERBs. AWERB members may wish to compare approaches within and between regions, for example to establish the extent to which others are able to find the time and resource to operate as a forum for discussion. We also suggest that AWERB members consult the RSPCA/LASA Guiding Principles for more background information and practical suggestions³.

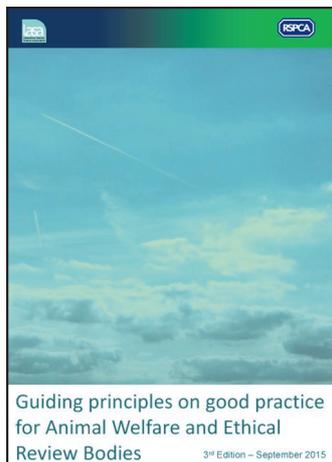
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References

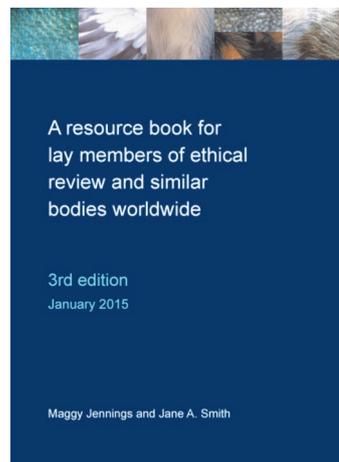
1. Home Office (2014) *Guidance on the Operation of the Animals (Scientific Procedures) Act 1986*. HMSO: London. gov.uk/government/publications/operation-of-aspa
2. *AWERB-UK 2016 Meeting Summary*. tinyurl.com/AWERB-UK2016
3. RSPCA/LASA (2015) *Guiding Principles on Good Practice for Animal Welfare and Ethical Review Bodies (3rd edn)*. tinyurl.com/RSPCA-LASA-AWERB
4. RSPCA (2015) *Resource Book for Lay Members of Ethical Review and Similar Bodies Worldwide* (by M Jennings and JA Smith, 3rd edn). tinyurl.com/RSPCALMH
5. Davies G, Greenhough BJ, Hobson-West P, et al. (2016) Developing a collaborative agenda for humanities and social scientific research on laboratory animal science and welfare. *PLoS ONE* 11 (7). journals.plos.org/plosone/article/asset?id=10.1371/journal.pone.0158791.PDF
6. European Commission (2010) Directive 2010/63/EU of the European Parliament and of the Council of 22 September 2010 on the Protection of Animals used for Scientific Purposes. *Official Journal of the European Union* L276: 33-79
7. National Competent Authorities for the Implementation of Directive 2010/63/EU on the Protection of Animals used for Scientific Purposes (2014) *A working document on Animal Welfare Bodies and National Committees to fulfil the requirements under the Directive*. ec.europa.eu/environment/chemicals/lab_animals/pdf/endorsed_awb-nc.pdf
8. Hobson-West P (2010) The role of 'public opinion' in the UK animal research debate. *Journal of Medical Ethics* 36: 46-49. tinyurl.com/zvdcylr
9. Job K (2014) *Local Ethical Review in the Regulation of Animal Experimentation: Constructing Ethical Science*. Unpublished PhD thesis, University of Nottingham.
10. Hobson-West P (2012) Ethical boundary work in the animal research laboratory. *Sociology* 46 (4): 649-663. soc.sagepub.com/content/early/2012/04/19/0038038511435058.full.pdf+html
11. Williams B (1993) *Ethics and the Limits of Philosophy*. London: Fontana.
12. Allen G (2008) Getting beyond form filling: the role of institutional governance in human research ethics. *Journal of Academic Ethics* 6: 105

13. Hawkins P (2013) Discussion paper: reducing severe suffering. *Animal Technology and Welfare* 12(2): 87-91
14. Lilley E, Hawkins P & Jennings M (2014) A 'Road Map' toward ending severe suffering of animals used in research and testing. *ATLA* 42(4): 267-272. Download as a poster at: tinyurl.com/roadmap-poster
15. Animal Procedures Committee (2003) *Review of Cost-Benefit Assessment in the use of Animals in Research*. HMSO: London
16. Hobson-West P (2009) What kind of animal is the 'Three Rs'? *ATLA* 37 Suppl 2: 95-99
17. Millar KM & Hobson-West P (2015) Supporting veterinarians to engage with ethics in practice: Safe spaces and the role of the veterinary ethicist. *Vethics International Conference*, University of Vienna, Austria.
18. Brown S (2013) *Independent Investigation into Animal Research at Imperial College London*. Download at <http://brownreport.info/>
19. Animals in Science Regulation Unit (2015) *Identification and Management of Patterns of Low-Level Concerns at Licensed Establishments*. www.gov.uk/guidance/research-and-testing-using-animals
20. *Concordat on Openness in Animal Research*. understandinganimalresearch.org.uk/policy/concordat-openness-animal-research/
21. McLeod C & Hobson-West P (2016) Opening up animal research and science-society relations? A thematic analysis of transparency discourses in the UK. *Public Understanding of Science* 25(7): 791-806. pus.sagepub.com/content/25/7/791.full.pdf+html
22. Levin N, Leonelli S, Weckowska D et al. (2016) How do scientists define openness? Exploring the relationship between open science policies and research practice. *Bulletin of Science, Technology and Society* 36(2): 128-141. bst.sagepub.com/content/36/2/128.full.pdf+html

Resources



The RSPCA/LASA Guiding Principles on Good Practice for Animal Welfare and Ethical Review Bodies, 3rd edition provides a brief, clear overview of common AWERB tasks and good practice for meeting these: tinyurl.com/RSPCA-LASA-AWERB



The RSPCA Lay Members' Resource Book, 3rd edition provides guidance on how to participate effectively in the AWERB, including making ethical judgements (NB although the title refers to lay members, the content is relevant to all member categories): tinyurl.com/RSPCALMH

For a wider discussion of ethical review worldwide see RSPCA ethical review webpages rspca.org.uk/ethicalreview



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