

Guide to the External Review of Animal Ethics Committees South Australia

In accordance with Appendix 1 of the *Australian Code of Practice for the Care and Use of Animals for Scientific Purposes, (7th Edition) 2004.*

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Summary

- Under the provisions of the South Australian *Animal Welfare Act 1985*, no person may conduct research on animals nor teach any science using animals unless they are licensed to do so, or working as the agent of a licence holder. The Minister for Environment and Conservation or their delegate may issue a licence to an institution, or an individual. As a condition of licence, a nominated Animal Ethics Committee must approve all research and teaching projects and the work must be carried out in accordance with the directions of that Committee.
- It is a condition of licence that all use of animals for research or teaching in South Australia must comply with the Australian Code of Practice for the Care and Use of Animals for Scientific Purposes, 7th Edition 2004 (the Code). Compliance with the Code ensures that the animals used are treated humanely and that their use is justified.
- In accordance with the requirements the Code, (Appendix 1 in the 7th Edition), a formal external review of the operation of all Animal Ethics Committees (AECs) is to be undertaken every three years.
- The primary purpose of the external review is to determine whether AECs and research institutions comply with the legislation and the Code of Practice and to make recommendations on how practices and procedures could be improved.
- Elements of the external reviews include:
 - review of paperwork (for example, the AEC terms of reference, proposals for research and teaching activities, procedures, minutes and reports, previous review reports, approved standard operating procedures and records of monitoring animal welfare);
 - Attendance at the AEC meeting to view the normal meeting protocols;
 - Inspection of the animal teaching, research and animal holding facilities; and
 - Discussions with the Chairperson and members of the AEC and scientific and animal care personnel.
 - Detailed examination of selected projects to map the processes of approval and implementation and to ensure that the requirements of the AEC are met.
- An External Review Report is provided to the AEC, for comment, before it is formally submitted to the Chair of the AEC. It is recommended that the Chair provide a copy of the report to the Minister for Environment and Conservation, the AEC and the Institutional Licence Holder(s). This report outlines the strengths and weakness identified and suggests any action, required to ensure compliance with Code.

Introduction

The purposes of the external reviews are to:

- assist compliance with the Code by all users of animals for scientific and teaching purposes in South Australia, and
- prevent or minimise animal suffering, and promote standards of animal care.

Appendix 1 of the 7th edition of the Code recommends that institutions and their Animal Ethics Committees (AECs) undergo a formal external triennial review (audit) '*to assist institutions in assessing whether the processes which they have established are meeting the goals set out in the Code*'.

External reviews assure the community that the care and use of animals for research and teaching purposes is accountable, open and responsible, and is undertaken in an ethical and humane manner. The Animal Welfare Unit (AWU), within the Department for Environment and Natural Resources (DENR), is the agency that administers the *Animal Welfare Act 1985* (the Act) and assists in the conduct of the external reviews.

Animal Ethics Committees in South Australia

There are ten Animal Ethics Committees based within institutions in South Australia.

AECs located interstate, but which collaborate with researchers in South Australia, are reviewed in accordance with the protocols adopted in that jurisdiction

Timing of External Reviews

In accordance with the recommendation of the Code, the aim is to review all AECs once every three years. The timing and schedule of an external review is based AEC meeting dates, availability of key staff and dates of animal use activities. External reviews could be brought forward if there were concerns about an AEC or if a bona fide complaint were made relating to an AEC or an activity.

Focus of the External Reviews

At the end of the initial round of reviews, an internal evaluation of the effectiveness of the external reviews was undertaken. It found that the reviews had resulted in significant improvements in all AEC's and that they are valuable. However, the intention of the Code is not to establish a government initiated review but rather for the AEC's to initiate an external evaluation of their processes and effectiveness. This has resulted in changes to the review processes which are described within this document.

The external reviews focus on education and collaboration to achieve compliance. Their purpose is to assist AECs to maintain and upgrade their standards to ensure that the welfare of animals in science and teaching.

However, disciplinary action or prosecution may be indicated if there are significant breaches of the Act or the Code resulting in poor animal welfare outcomes, and a failure to address corrective action.

Fees

AECs are charged on a cost-recovery basis, for expenses incurred by DENR for involvement of an interstate panel member on the External Review Panel. All other expenses incurred are met by DENR.

External Review Panel

South Australia has developed an External Review Panel model, which undertakes the reviews. The Panel consists of four persons who will usually have the following collective expertise:

- an interstate Chair with considerable experience in the use and governance of animals in research and teaching;
- an inspector pursuant to the *Animal Welfare Act 1985*;
- a veterinarian
- a person who has used animals for research or teaching purposes;
- a person with a public commitment to animal welfare;
- a person with knowledge of the Animal Welfare Act 1985, its regulations and the Code of Practice for the Use of Animals for Scientific Purposes;
- a person who has direct responsibility for the care of animals used in research or teaching

The External Review Panel has broad, relevant knowledge and experience. This provides an independent animal welfare, animal husbandry, scientific and veterinary perspective to the reviews. The interstate panel member provides an independent viewpoint and additional auditing expertise. The Panel membership is varied to ensure that no member is directly affiliated with the institution being reviewed.

Scope of the External Reviews

The aim of the review is to assist AECs to comply with the requirements of the Code and ensure that high standards of animal welfare are maintained for all animals used for research and teaching purposes. A key component is to encourage a system of self-regulation and self-assessment for the institutions and the AECs. The scope of each review depends on the corporate identity of the institutions.

The reviews are designed to ensure that:

- the AEC is operating effectively within legislative requirements;
- AEC processes are fair and transparent to all involved;
- there is effective communication between the AEC and animal users and the AEC senior management of institutions;
- the AEC is a committee of standing within the institution;
- the AEC is receiving necessary support from the institution to meet its responsibilities;
- the involvement of external members in AECs is actively supported and facilitated;
- investigators are complying with the requirements of the Code as it applies to their animal use activities;
- there are effective strategies to promote and monitor the implementation of replacement, reduction and refinement (the 3Rs) within the institution;
- there is effective monitoring of the welfare of animals;
- any facilities used to house animals are managed to achieve high standards of animal welfare, and
- facilities are managed and staffed to achieve high standards of animal welfare.

Conflicts of Interest and Confidentiality

Members of the External Review Panel declare any potential conflict of interest before the review and treats commercial-in-confidence information gained during the review as confidential and does not disclose this information to third parties without the permission of the institution or under legal process. In the event of a conflict of interest alternative panel members may be contracted.

Indemnity and Public Liability

The Panel conducts the review at the invitation, and on behalf, of the institution's animal ethics committee. The review report is provided to the Chair of the Animal Ethics Committee and is the property of that committee. Members of the External Review Panel are not personally civilly liable for an act done or omission.

Compliance

Voluntary compliance and self-regulation within the research and teaching industries are encouraged and the External Review Panel works with the AECs to assist them to comply and maintain high standards of animal care. The reviews are not intended to catch people out, they are intended to encourage improvement, to raise standards of animal welfare, and to implement the 3Rs. The final report is provided to the committee with a recommendation that a copy or extract be provided to licence holders, if appropriate, and to the Minister responsible

for animal welfare. The responsibility of the Panel finishes with the provision of the final report to the Chair of the committee.

External Review – NH&MRC guidelines

The procedures follow the NH&MRC guidelines 'External review of the operation of animal ethics committees' contained in the 7th edition of the Code (Appendix 1).

External review checklists are used to assist the External Review Panel cover all aspects of the animal ethics system. (Appendices 2 - 4).

The following aspects are checked

1. AEC documentation:

The External Review Panel checks membership of the AEC, terms of reference, quorum, meeting procedures, decision making processes, record keeping and paper trail, register of projects, frequency of meetings, frequency and scope of site inspections, reports, recommendations to institution, monitoring of animal care and use, and implementation of the 3Rs (Reduction, Replacement, Refinement).

A checklist used for reviewing the AEC is attached as Appendix 4. The External Review Panel meets with as many relevant staff as possible, including Chief Investigators and animal house staff.

External reviews are conducted triennially. All external reviews are scheduled in advance and the Institutional license holders and AECs and are given notice. In all cases, the reviewers will ensure that when inspecting premises an institutional staff member accompanies them.

2. Review of individual approved projects:

Selected approved projects are reviewed in detail to:

- check record keeping and monitoring of animals, and that the project is carried out according to the conditions of the AEC approval. The institution is given prior notice of which projects are to be reviewed so that where possible, the External Review Panel can interview the chief investigator on-site to discuss the project and the paper trail.
- check that there is appropriate supervision of animals by trained personnel, and that consideration is given to the wellbeing of the animals, their housing and husbandry and animal identification.

3. Inspection of permanent animal holding facilities:

An inspection of the physical facilities to house animals is carried out to determine compliance with the Code as well as the relevant codes of practice (if these exist) for the particular species. Central to this is an evaluation of the wellbeing of research and/or breeding animals.

4. Inspection of field sites:

If research or teaching is undertaken outside a permanent animal holding facility, a field inspection may be carried out on a selected project(s) where practicable. The Panel liaises with the AEC and researchers carrying out field activities to arrange a suitable activity to review.

Field inspections focus on:

- on-site animal holding and handling facilities,
- trapping techniques,
- protection from predators,
- compliance with standard operating procedures (where established),
- release or relocation procedures, and
- provision of food, shade and shelter, where appropriate.

External Reviews of Animal Ethics Committees – Procedures

The External Review itself usually takes three to five days depending on the size of the institution and the number and complexity of the protocols under consideration of the AEC.

1. Before the review

During phase one of the external reviews:

- The Chair of the Review Panel will write to the AEC Chair about six to eight weeks before the intended review advising that, subject to the invitation of the committee, the review will take place. This letter will state the intended Panel members and the likely cost of the review. Subject to the agreement of the AEC Chair to these arrangements, the review will proceed.
- The AEC Executive Officer will be advised, at least one month before the external review, of the criteria for the review, and the required documentation. In the first instance, this comprises:
 - A copy of the minutes of all meetings since the last review
 - A list of all active protocols

The Panel will use this information to choose the projects which will be reviewed in detail. The Executive Officer will be advised of which projects will be reviewed at least three weeks prior to the Review to give researchers adequate time to organize their diaries and meet with the Panel.

- At least 10 working days before the external review commences, the Executive Officer provides the Panel with:
 - Copies of all paperwork for the AEC meeting that the Panel will attend (agenda, applications, modifications, correspondence etc).
 - Copies of licences of those individuals or organizations which are serviced by the committee
 - Copies of terms of reference, standard operating procedures, grievance procedures etc;
 - Copies of annual reviews and other documentation relevant to the committee and its operations
 - Written documentation regarding the projects selected for in-depth review including the approval and conditions, monitoring records, inspection of animals and any other relevant documentation
 - The Animal Welfare Unit, DENR, will liaise with the Executive Officer regarding quarantine procedures for site inspections and if appropriate, the Executive Officer will advise the Unit whether there are any restrictions on visiting other sites prior to the review. The Animal Welfare Unit will work with the Executive Officer to develop a review schedule and to comply with any quarantine requirements.

Prior to the review commencing, the Panel will audit the AEC records. This will include reviewing the list of approved and current projects, minutes of meetings, applications and approvals, modifications, annual review and completion reports, and the AEC's annual report to the Institution. The External Review Panel may seek clarification on issues raised in the minutes and inspect paperwork relevant to those issues.

2. During the review.

At the commencement of the review, the Panel will:

- report to the office or administration section of the institution to introduce themselves and arrange to be accompanied by the appropriate staff.
- meet with the Executive Officer and AEC Chairperson (if convenient) to introduce panel members and discuss the program and scope of the external review.

During the review the Panel will:

- attend an AEC meeting and give a brief introduction to the members about the aims and scope of the review. Subject to the approval of the Chair, the Panel will ask questions about applications and contribute to discussion (as required), however they do not contribute to the decisions of the AEC. The External Review Panel determines

whether the AEC carries out its activities in accordance with Code requirements and whether all members are involved in the decision-making process.

- discuss issues arising from the meeting and seek comments from AEC members (in particular the external members) about the overall processes, training and support resources and the monitoring of animals within approved projects.
- carry out site inspection(s) of animal holding areas and animal facilities where approved activities are carried out. The Panel will inspect:
 - general standards of care and husbandry of animals,
 - housing,
 - animal identification,
 - monitoring and treatment records, and
 - housekeeping.

A key aspect of the site inspection is to interview animal house managers, animal care staff and investigators about their work, and discuss concerns or areas of possible improvement.

- review the projects nominated for detailed examination, interview investigators and review the documentation relating to it. This provides the Panel with an understanding of the entire animal ethics system from the initial application through to the monitoring records and reports to the AEC. The External Review Panel will have an opportunity to talk to the investigator on site and inspect the animals and records for the activity.
- conduct an exit meeting with the AEC Chairperson and give preliminary feedback. This meeting enables the External Review Panel to highlight commendations observed and any recommendations, which will be included in the External Review Report. The Panel solicits comments from the institution on the review process, the overall animal ethics system and identifies common issues where the institution may require assistance to meet the standards. If serious problems or non-compliance with legislative requirements are identified during the review, the Chairperson will be made aware of them at the exit meeting.

3. External Review Report

Following each review the Chair of the External Review Panel drafts a Report to the Chairperson of the AEC for comment and feedback. The Chair may wish to respond to comments made by the Panel or clarify any issue which may have been misconstrued. The Panel will consider comments made by the Chair and may modify the Report accordingly. After a period of one month the final report is sent to the Chair of the AEC.

The External Review Report outlines details of the review, commendations, recommendations for improvement; any non-compliance detected and recommended corrective action.

4. After the Review Report

The Review Report is the property of the Animal Ethics Committee and may be used as the committee sees fit. The following are recommended:

- AECs will be invited to submit a written response to the AWU outlining the implementation of the corrective actions or recommendations identified in the External Review Report. It is anticipated that such a written response will be received within six months of submission of the final report.
- AEC's may serve one licence holder, several large licence holders or numerous individuals and small companies. It is expected that a copy of the Report will be provided to large licence holders but it is recognised that it is likely to be of little interest to individuals who submit one protocol to the committee every few years. It is therefore recommended that the full report be provided to the major licence holders and a summary or extract provided to smaller groups. Individuals with few protocols may be advised that the Report is available if the committee considers this to be appropriate.
- The committee may wish to provide a copy of the report to the Minister responsible for animal welfare when applying for reappointment.

The Report is subject to the Freedom of Information Act. Once the Panel has submitted the final Report and it has been agreed by the Chair of the AEC, all supporting paperwork is destroyed. Any requests for access to the report should be addressed to the Chair of the AEC or the licence holder (as appropriate). The Panel will treat all information that has been provided to it in the course of the review as strictly confidential.

5. Responding to the Report

The External Reviews are intended to be facilitative and educative, however corrective action is required if there is non-compliance with the legislative requirements. In such circumstances, the AWU will liaise with the chairperson of the AEC to negotiate achievable time frames for any corrective action necessary. Timeframes are dependent on the severity of the matter and the risk to animals.

Non-compliance may be:

- **Urgent:** If an urgent situation were detected, it would be brought to the attention of the person responsible for the daily care of the animal immediately and to the Chair of the AEC as soon as possible. This could involve animals such as fly blown sheep or cattle with horns turned into the head. One member of the Panel is an authorized inspector. If the person responsible for the animal failed to take immediate corrective action, the

inspector may issue an Animal Welfare Order or refer the matter to the RSPCA for investigation. (Note: No urgent situations have arisen in the course of reviews)

- **Major:** Major non-compliance involves a situation where animal welfare is, or could be, severely compromised and there is a need to intervene to prevent pain and suffering. Examples could be an activity proceeding without ethics approval or an investigator not abiding by conditions of approval or carrying out invasive procedures without the approved analgesia or anesthesia protocols or other procedures being undertaken that were not approved by the committee.
- **Secondary:** Secondary non-compliance may constitute a breach of the Code and could compromise the welfare of the animals or the philosophy of the ethics system and encouragement of the three R's. They require corrective action to be implemented in a reasonable time frame, negotiated with the institution based on the degree of risk. Examples are housing that does not comply with industry codes of practice or NHMRC guidelines, or procedures carried out on animals when there is evidence of a validated less invasive or non-animal alternative.
- **Minor:** Minor non-compliance does not constitute a breach of the Code but requires corrective action. Examples are failure of investigators to provide annual progress reports on approved activities, inadequate AEC Terms of Reference or Operating Procedures or inadequacies of the ethics application.

The External Review Report may also make recommendations to assist the institution and/or the AEC raise standards of animal care and management or streamline the animal ethics system and effectiveness of the AEC.

Examples of recommendations are suggestions for minor upgrades of animal housing, recruiting additional / proxy members for the AEC or providing improved environmental enrichment to caged laboratory animals.

Non-Compliance and Renewal of Licence

The Minister or his delegate may request the results of the external review and implementation of corrective action when considering renewal of the institutional licence. The Minister also has the power to amend, suspend or cancel the licence and revoke membership of AEC members if there were continued noncompliance with legal requirements or blatant disregard for the requirements of the Code and/or the Act.

The Animal Welfare Unit will assist AECs and licence holders to implement corrective actions.

Complaints about scientific use activities

Complaints received by DENR or the RSPCA (SA) Inc relating to use of animals for scientific purposes will be investigated by an inspector under the Act. Where the complaint relates to an approved activity, the inspector will generally investigate the complaint in conjunction with the Chair of the AEC that is responsible for the activity.

The inspector and the AEC Chair will determine whether there has been a breach of the Act or the Code and recommend corrective action where appropriate.

Post-External Review Monitoring of AECs

The AWU will provide ongoing support to AECs by attending at least one meeting of each AEC annually to monitor normal meeting protocols, provide advice and respond to any queries.

The AWU also will hold a meeting with all the AEC Chairs and Executive Officers at least twice annually to discuss the administration of the provisions of the *Animal Welfare Act, 1985* relating to research and teaching using animals, and the Code of Practice.

Commendations

The Department of Environment and Natural Resources commends everyone involved in the External Review processes and thanks the Research and Teaching community for its ongoing openness and willingness to assist in the external review processes in every way.

APPENDIX 1 External Review Timeline

Time	Event	Comment
8 weeks before review	Panel Chair writes to AEC Chair seeking invitation to conduct review	Letter specifies dates, membership of Panel and cost
7 weeks before review	AEC Chair writes to Panel Chair inviting attendance	Letter endorses arrangements or seeks changes
6 weeks before review	AWU liaises with Exec Officer for initial documentation	Require copies of all minutes since last review and list of active protocols
5 weeks before review	Panel meets by teleconference or email to decide on protocols	Exec officer advises researchers to organize interviews
4 weeks before review	AWU advises Exec Officer of protocols to be reviewed in detail	Exec officer advises researchers to organize interviews
3 weeks before review	Exec officer provides AWU with all paperwork for selected protocols	May include approval, conditions, discussions, reports etc
2 weeks before review	Exec officer provides AWU with paperwork for AEC meeting and policies, information etc	Includes ToR, SoP's, annual reviews, previous external review etc
2 weeks before review	Exec officer and AWU develop review schedule	Itinerary includes times, places, people and activities
1 weeks before review	Panel meets to confirm itinerary and discuss records provided	Clarification on issues may be sought from the Exec officer
Day 1 of the review	Report to Exec officer on arrival at the institution	Opportunity to advise of biosecurity or OHS requirements etc
Day 1 of the review	Meet with AEC Chairperson (if convenient)	Introduce panel members, discuss the program and scope of the external review.
During the week of the review	Panel attends an AEC meeting	Determine whether procedures fit legislation and Code
Before or after AEC meeting	Panel meets with AEC members (especially external members)	Opportunity to raise issues or comment on AEC performance and practices
During the week	Site inspections of animal holding	Assess standard of care, housing,

of the review	facilities	ID, records, monitoring etc
Whilst visiting animal facilities	interview animal house managers, animal care staff and investigators about their work	Determine areas of concern or possible improvement and areas in which the institution does well
During the week of the review	Review documentation of projects selected for detailed examination	Panel discussion before meeting with researchers
During the week of the review	Meet principal investigators for projects selected for detailed examination	Raise concerns, issues, seek feedback on AEC process
At the end of the review week	Exit meeting with exec officer	Provide feedback on findings and process of review
At the end of the review week	Exit meeting with AEC Chair	Provide feedback on findings and process of review
3 weeks after review	Panel Chair submits draft report to members for comment and changes	Ensure the report reflects the views of all members
4 weeks after review	Panel Chair submits draft report to AEC Chair for comment	Allows AEC to correct any factual errors or misunderstandings
8 weeks after review	Panel considers comments by Chair of the AEC and amends the report	Only factual issues will be amended
8 weeks after review	Final report provided to Chair of the AEC	Panel shreds all documentation relating to the review.
8 weeks after review	Panel Chair submits account to AWU	This is professional fees only
9 weeks after review	AWU submits account to AEC Chair for costs	This is interstate member's fees, accommodation and airfares
3 months after review	Chair of the AEC provides report to licence holder(s) as appropriate	This may be the whole report, an extract, a summary or nothing
6 months after review	Chair of the AEC writes to AWU advising of how recommendations will be implemented	This is at the discretion of the Chair of the AEC

Extract from NHMRC 7th edition of scientific use code, external reviews

External review of the operation of institutions and their animal ethics committees

1. Introduction

The Code embodies a system of self-regulation by which each institution must put in place processes to ensure that the care and use of animals for scientific purposes is undertaken in an ethical and humane manner. In keeping with the notion of self-regulation, the Code defines areas of responsibility and sets out the principles that guide these activities to ensure the expected goals are met. A key component of any institutional process is the AEC which determines whether a proposed use of animals is justified according to the principles of the Code, and then monitors the ongoing scientific activities. Importantly, through the membership of the AEC, the Code requires input from the wider community in the oversight of these activities. Thus, the effective operation of the AEC in all aspects of its responsibilities is central to ensuring that an institution meets its responsibilities under the Code.

To assist institutions to assess whether the processes they have established meet the goals set out in the Code, a formal external review of the operation of their AEC, at least every three years, is recommended (see 2.1.2). This Appendix is intended as a guide to assist institutions in structuring this external review to best meet their specific needs and to achieve the desired outcomes.

Existing government compliance processes carried out under the administration of State and Territory animal welfare legislation may achieve the outcomes set out in this document. Information on inspection, review and other compliance processes conducted under these legislations is available from the relevant government departments.

2. Scope and outcomes of the external review

The aim of the external review is to validate that the welfare of animals used for scientific purposes, including research and teaching, by an institution is safeguarded in accordance with the Code.

The primary focus of the external review should be to establish evidence that all scientific and teaching activities involving the use of animals are adequately justified, that the welfare of those animals used is given due consideration and that the AEC is effective, taking into account its terms of reference as set out in the Code.

As a result of these enquiries, the external review should enable the institution to evaluate and, if necessary, modify processes to ensure it meets its responsibilities under the Code. The external review may also assist scientific and animal care personnel to identify opportunities to promote animal welfare.

The external review process should be educational and provide an opportunity for self-assessment so that members of the AEC and those at the institution who have responsibilities for animal care and use, are involved in achieving the desired outcomes.

As a result of the external review, the institution should know that:

- the AEC is operating effectively according to the requirements of the Code;
- AEC processes are fair and transparent to all involved;
- there is effective communication between the AEC and researchers and the AEC and senior management;
- the AEC is a committee of standing within the institution;
- the AEC is receiving necessary support to meet its responsibilities;
- the involvement of external members in AECs is actively supported and facilitated;
- there are effective strategies to promote and monitor the implementation of the 3Rs by the institution;
- there is effective monitoring of the welfare of animals; and
- any facilities used to house animals are managed to achieve high standards of animal welfare.

3. Conduct of the external review

It is recognised that there are many acceptable models for the conduct of an external review, some of which are already in place, and the approach taken will vary with particular institutional needs. To maximise the benefits to the institution, the external review should represent an informed, broad-based view. Members of the review team must be external to the institution and may include persons who have relevant and appropriate qualifications or experience such as a knowledge of animal welfare matters pertaining to research and teaching institutions, a demonstrated interest in animal welfare or experience in the administration of animal welfare and animal ethics appropriate to the institution.

The ways in which the review team accesses information and conducts its enquiries will vary but could include review of documentation, observation of activities and procedures, and discussions with parties involved. For example, elements of the external review may include:

- review of paperwork (for example, the AEC terms of reference, proposals for scientific and teaching activities, procedures, minutes and reports, previous review reports,
- approved standard operating procedures and records of monitoring animal welfare);
- attendance at an AEC meeting to view the normal running of the meeting;
- inspection of animal teaching and research areas and animal holding facilities; and
- discussions with the Chairperson and members of the AEC and scientific and animal care personnel.

The review team may find it helpful to track a particular proposal as a way of understanding how the processes work in a given institution.

The institution and the review team should establish an agreed timetable and approach for the conduct of the external review, access to information and confidentiality. The institution should consider ways in which it can facilitate involvement of personnel in the external review process.

The review team should report to the Head of the institution, making recommendations to address any problems identified with the operation of the AEC or with the application of the principles of the Code.

The institution may consider publishing a summary of the external review report, possibly in an institutional annual report or web site. The summary report could also be made available to the relevant regulatory authority and funding bodies of the institution.