



POLICY

TITLE:	Whistleblower Policy
Policy Number:	2014-007
Responsible Department:	Institutional Animal Care and Use Committee
Policy Contact:	IACUCOffice@westernu.edu
Approval Date:	7/9/14
Reviewed Date:	5/10/17; 1/14/2020
Revised:	10/26/16 (Who may report & examples); 5/10/17 (Added anonymous report button); 1/14/2020 (wordsmithing)
Legislation:	Animal Welfare Act (Title 9 CFR, Subchapter A, Part 2, Subpart C 2.32 (c)(4))

Purpose of Policy: To protect employees from reprisal for reporting possible occurrences of animal mistreatment, noncompliance with policies and procedures or practices that compromise human safety at any facility owned or operated by Western University (WesternU).

Policy Information: The Animal Welfare Act states that “No facility employee, Committee member or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act.” The Public Health Service Policy on Humane Care and Use of Laboratory Animals states that “Mechanisms for reporting concerns should be posted in prominent locations in the facility and on applicable institutional website(s) with instructions on how to report the concern and to whom.” It goes on to say that “The process should include a mechanism for anonymity, compliance with applicable whistleblower policies, nondiscrimination against the concerned/reporting party and protection from reprisals.” Lastly, WesternU’s Animal Welfare Assurance for Domestic Institutions states that “Under no circumstances shall reporting such instances be detrimental to an individual’s standing within the Institution.”

WesternU encourages the reporting of concerns related to animal welfare as WesternU is committed to the finest animal care and assures the public, researchers, employees and students that there is a true desire to investigate allegations of mistreatment or noncompliance. The Institutional Animal Care and Use Committee (IACUC) and veterinary staff fully support this philosophy. Placards shall be conspicuously posted in and around research laboratories and animal facilities with the complaint reporting procedure and contact names and telephone numbers.

Any employee, student or volunteer may report concerns involving the care and use of animals at WesternU. Anyone wishing to report a concern regarding animal mistreatment, noncompliance or concern for human safety in research or teaching facilities may do so anonymously by using the Report button on the IACUC’s website or by submitting a report through campus mail to the IACUC Chair, Attending Veterinarian or Institutional Official. If the person filing the complaint identifies himself or herself, protection of their identity will be maintained to the extent possible within the legal needs of

the law and the investigation. Reports may be made without fear of reprisal. WesternU will not tolerate any reprisal against an individual who has come forward with concerns or allegations of wrong-doing involving the care and use of animals. Every complaint shall be taken seriously and reviewed by the IACUC.

Examples of reportable events include, but are not limited to, the following:

- A condition that is, or may be, a threat to the health or safety of animals;
- Conduct of animal-related activities or protocol modifications without prior IACUC approval;
- Continuing animal-related activities beyond the protocol expiration date;
- Conduct of animal-related activities by persons not listed on a protocol for that activity;
- Continuing noncompliance.

Timely reporting is essential to protect the animals involved and to facilitate the investigation of the allegations. However, determining if something falls within the letter or spirit of mistreatment or noncompliance requires judgement. If possible, the Attending Veterinarian, animal care staff and investigators should work together to resolve a problem but, if there is doubt, it is best to submit a report as it may protect the animals, the investigator and WesternU alike.

Any employee who feels that a personnel action has been taken against them in reprisal for reporting a potential violation of animal care and use requirements should contact either their supervisor, the IACUC Chair, the Attending Veterinarian or the Institutional Official. The contact should be made as soon as possible after the personnel action.