



To [REDACTED] PELh and Chair, [REDACTED] WD, [REDACTED] NVS, [REDACTED] NTCO, [REDACTED]
[REDACTED] NACWO, [REDACTED] PILh, [REDACTED] PILh and supervisor, [REDACTED] PPLh, [REDACTED]
[REDACTED] PIL.

From [REDACTED] Named Information and Compliance Support Officer

Date 18/07/2018

Time 11.00

Venue [REDACTED]

Subject Unauthorised PIL use

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Our Ref CAM_AN_19

Policy-

Compliance Assurance Meetings (CAMs) are a management tool, designed to ensure Governance outside of the Act, to protect individuals, ensure due process and systems are implemented within the division of University Biomedical Services. This process will ensure the University upholds the highest standards of animal welfare and good practice relating to animal care and use.

NOTE: A CAM meeting does not replace the investigation of an incident by the Home Office or other authority. Therefore for example, where the local inspector deems appropriate a Home Office non-compliance investigation may run in parallel or sequentially with a CAM.

Event-

Personal Licence holder (PILh) [REDACTED] carried out regulated procedures on rats before having a licence in place amended to do so. The time line of events attached details the dates of when they carried out these procedures under direct supervision of PILh [REDACTED]

The PILh [REDACTED], did not check their licence before beginning training and performing procedures on rats. They falsely believed that the certificate received after completing their rat handling training and assessment was confirmation that their PIL had been automatically amended. They accept full responsibility for the confusion. They only became aware when they logged into ASPeL in June to view their PIL, and it was at this stage they realised they were only licenced to perform procedures on mice.

The ASPeL system has been explained to the PILh [REDACTED] in detail by the NACWO [REDACTED] and PIL [REDACTED] [REDACTED] was amended on 26th June 2018, licence authority is now in place to perform procedures on rats.

The local Home Office inspector (HOI) has been informed and any information from this CAM will be recorded along with any advice received from the inspector.

A CAM has been selected as the most appropriate means of action to ensure governance and compliance and, setting processes in place to impress there is no repetition of this event.

[REDACTED]

Attachments:



██████████ - PIL
amendment timeline



Email &
Observation Sheets.



Study Plan.pdf



Procedure log
sheets.pdf

Action-

The Establishment Licence holder (PELh) outlined his understanding of this case which occurred due to a misunderstanding about the licensing process, it was not a deliberate action, and one which the PILh had shown great remorse.

The PILh apologised once again, and concurred that they were aware the Universities' Training Group Certificate was not a licence, but thought it was an acknowledgement that their PIL had been updated. The Named Information and Compliance Support Officer (NICSO) showed the committee a poster, designed by UBS, for display in each facility. This poster is designed to raise awareness and therefore reduce future problems of this kind.

Action 1

PILh [REDACTED] had left one of the University units at the end of 2017 at which point she requested that her PIL be revoked, the process was initiated by the NACWO 21/12/17. However they were only moving to another University unit so according to UBS records the day after this PIL request to revoke was actioned the request was reversed. [REDACTED] referred to this as “archiving her PIL”. In the process there appears to have been a delay in the processing of the PIL by UBS Administration which may have arisen due to changes to staff.

The PELh suggested it would be useful in future if a covering letter was attached to each Certificate which explained the process a PILh needs to follow after successfully completing a Home Office PIL course. This might also alleviate future issues.

Action 2

Action 2

The PELh considered when animals were used for the first time, the PIL holder must initiate a thought process- “Do I have a licence to perform this procedure, on this species, and am I trained and competent”? The PILh said their Certificate only had the species rat on it, and this had caused more confusion because they had previously undertaken training in mice and expected that species to appear on the Certificate.

The Welfare Director (WD) explained that it was the responsibility of the PILh to check PIL authorities are in place before undertaking regulated procedures for the first time. Supervisors should also check the licence authorities of everyone they supervise before training begins.

The Project Licence holder (PPLh) explained that the HOI had met staff. The HOI acknowledged this was a technical error that would result in a letter from them setting out the facts of the case. This record will remain on the PILh's file for 3 years. It was noted there is good communication between UBS staff and the researchers involved in this case.

The PPLh indicated that this incident had come to light following a decision to place company PILs on a shared drive to enable ease of checking PIL authorities by all staff. This action demonstrates



the company's commitment to improving their processes and should help to ensure they reduce future technical errors of this kind.

CC [REDACTED] HOI

Action 1- The **NICSO** will circulate a "Do you have a Personal Licence?" poster to each UBS facility.

Action 2- A covering letter will be developed which will be attached to every Universities' Training Group Certificate to explain the process a PILh should follow after successfully completing a PIL course; NICSO to instruct UBS Administration and discuss with the Training Centre Manager.

Glossary of terms

ASPeL	Animal Scientific Procedures electronic Licencing
CAM	Compliance Assurance Meeting
HOI	Home Office inspector
NACWO	Named Animal Care and Welfare Officer
NICSO	Named Information and Compliance Support Officer
NTCO	Named Training and Competency Officer
NVS	Named Veterinary Surgeon
PELh	Establishment Licence holder
PIL	Personal Licence (Procedures Individual Licence)
PILh	Personal Licence holder
PPLh	Project Licence (Procedures Project Licence) holder
UBS	University Biomedical Services
NVS	Named Veterinary Surgeon
WD	Welfare Director