

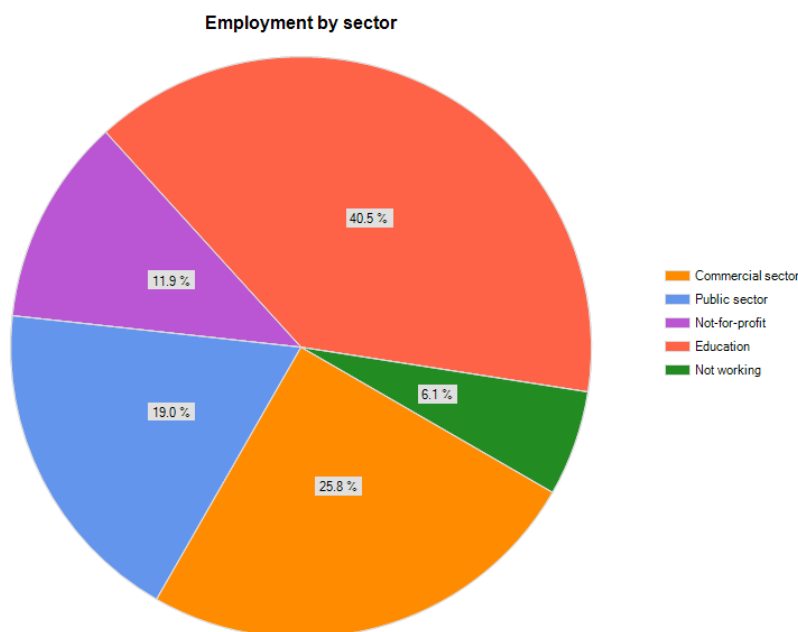
# Concordat consultation report

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Understanding Animal Research received **505 complete responses** to the public consultation on the Concordat. The survey was publicised through UAR materials, to stakeholder groups involved with development of the Concordat, through the national media and to stakeholders and participants connected with the Public Dialogue on Openness in Animal Research.

The consultation questionnaire was completed by 41% of those who began it, and only completed responses were counted within the qualitative data, though all comments were reviewed, regardless of whether the questionnaire was complete.

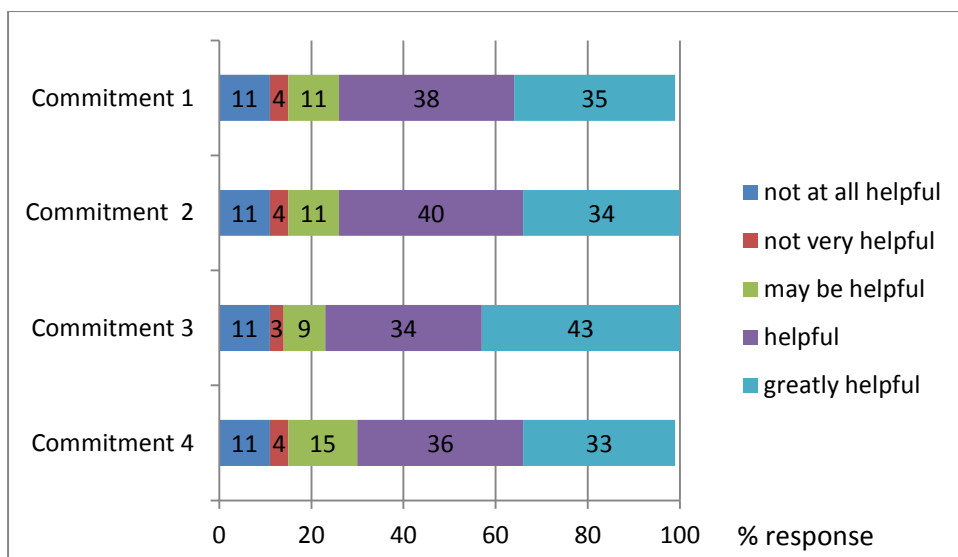
The respondents were 58% female and 42% male. All age groups (over 15 years) were represented. The modal employment sector of respondents was education, and many of these indicated that they were university researchers, students or lecturers. This was expected as many of the concordat signatories are universities and this was the first opportunity for individuals to have their say.



## Comparing overall responses to the Concordat commitments

Overall the Concordat commitments were positively-received. Responses did not differ greatly between the commitments, with a mean 73% ( $\pm 4$  SEM) agreeing that the commitments outlined in the concordat would be helpful or greatly helpful in taking the sector towards greater openness.

The commitments were felt to be unhelpful by 15% ( $\pm 1$  SEM) of respondents.



## Responses to commitment 1

### *We will be clear about how when and why we use animals in research*

*This commitment seeks to ensure that all organisations acknowledge, both internally and externally, that they or their members fund or carry out animal research. It also seeks to ensure that they are transparent about the use of that research. All signatories are expected to agree to these basic principles of openness, which underpin the whole of the Concordat.*

The general response to this commitment was favourable (as shown above). Within this commitment the guidance indicates that certain areas will require focus.

- a) *Communications about the use of animals in research should provide accurate descriptions of the benefits, harms and limitations of such research, be realistic about the potential outputs of such research, and be open about the impact on animal welfare and the ethical considerations involved.*

Respondents were asked on a Likert scale whether they agreed or disagreed that this proposal was key, insufficient or realistic for openness to be achieved.

The modal response:

- **agreed** that the proposal was key to openness (47%)
- **tended to disagree** that the proposal was insufficient (32%)
- **tended to agree** that the proposal was realistic (44%)

- b) *We will take steps to ensure that staff (and students where relevant) are aware of our organisation's involvement with the use of animals in research and will help them to discuss and reflect on that use.*

The modal response:

- **agreed** that the proposal was key to openness (47%)
- **tended to disagree** that the proposal was insufficient (33%)
- **tended to agree** that the proposal was realistic (44%)

- c) *Where signatories to the Concordat are working together on a research project, all the relevant parties will agree to take an open approach to communication about the research and to support their partners in this. Where there are partnerships with non-signatory organisations or there are issues of confidentiality or commercial sensitivity, signatory organisations will be as open as possible in sharing information with the public while respecting these constraints.*

The modal response:

- **agreed** that the proposal was key to openness (47%)
- **tended to disagree** that the proposal was insufficient (31%)
- **tended to agree** that the proposal was realistic (41%)

Generally, responses indicated that the proposals were viewed as important aspects of openness. There was a much greater spread of responses in considering whether the proposals were sufficient than for the other questions. Proposals were seen as realistic, but with some reticence, as borne out in the qualitative responses.

## Comments on commitment 1

There were 109 comments made as responses to commitment 1. These were analysed and coded into categories (some responses fell into more than one category).

### Mechanisms around openness (21%)

A number of responses focussed on the practical aspects of how the Concordat commitments could be adhered to, stating that step-changes in attitudes were essential for this to be more than a tick-box exercise. Some felt that it was not only the research organisations where attitudes needed to change, but that public attitudes would also need to shift. There were concerns that not all organisations are equal in terms of their institutional processes and drivers. Within this category were practical aspects of delivering on openness commitments, such as avoiding jargon when addressing the public, and ensuring staff within an institution have a good understanding of the work done there. Some pointed out that aspects of delivering the Concordat may not be easily implemented.

*“Embedding this commitment requires fundamental change to our perceptions based upon our previous experiences of being open to a public unwilling to understand. This will take different lengths of time in different institutions to implement and embed, and thus timescales for this should be tailored to the organisation in each case, perhaps with implantation deadlines set by the organisation itself.”*

*“Partnerships with non-signatory organisations. I wonder if there has been enough thought on this. I see loss of partnerships here as two orgs disagree on something as important as Openness. There may have to be thought given to the fact that some partnerships may not happen at all.”*

### Too much leeway (17%)

A number of respondents felt that the wording of commitment one gave too much scope for organisations to hide behind declarations of confidentiality or health and safety, and that this was not true openness. There were concerns that this commitment gave too much scope to allow signatories a ‘loophole’ to avoid openness where convenient.

*“It seems that commercial sensitivity or confidentiality could, in any circumstances, be used to prevent the openness which, at first reading, seems to be the main thrust of Commitment 1.”*

*“The term ‘reasonable enquiries’ is open to wide interpretation; an enquiry may be reasonable to one party but not another. A definition of ‘reasonable’ may be needed or guidelines of the type of enquiries that can be made.”*

### **Threats to researchers (10%)**

These responses were largely from respondents who were concerned that openness may provide opportunities for those who are opposed to animal research to misrepresent researchers and take malicious actions against them. This included a large number (5% of responses) who were specifically concerned about the safety of staff within research organisations and the impact of these worries on openness.

*“I remain unconvinced that the rationale and case for the whole strategy of openness is of use. I consider that there is any evidence that those who are opposed to animal research are responsive to evidence data or rational debate and their response to openness will be simply to gain information and access on which to pursue further obstructive campaigns.”*

*“I worry about the safety implications for staff working for institutions that openly carry out animal research, even if those staff members are not directly involved.”*

*“Wording will be difficult as those who wish to may twist our words to suit their agenda.”*

*“Openness and transparency are the keys but there is a long way to go to overcome the perceived legacy of fear engendered by animal right extremist groups over a decade ago. This perceived threat must be put into perspective to encourage more openness.”*

### **Self-reporting bias (8%)**

Some of the respondents raised concerns that a voluntary commitment to openness, based on self-assessment and reporting would have no impact because it would not be regulated, and that external scrutiny was required for openness to be effective.

*“The signatories are in control of what they choose to be open about. So there is no way of knowing how ‘open’ they will be.”*

*“Unfortunately, all of this is very much in the eye of the beholder...Having spent a great deal of my professional life in a research environment I find that the requirement for funding / grants etc. and the need to satisfy journal editorial boards rarely leads to much truly reflective thinking on the part of the experimenter. One will believe one's research is critical and that the impact on animal welfare minimal and / or justifiable, even if neither is the case.”*

### **A step forward (8%)**

These comments indicated that the Concordat is a big step for the research sector and has the potential to make a real difference.

*“I think this approach will go a long way in opening people's minds and is a step in the right direction.”*

*“We should have doing this years ago.”*

### **It will make no difference (8%)**

Some comments indicated that this commitment and concordat would have little impact on research.

*“Doesn’t go far enough. The public will continue to be largely ignorant of animal testing as the only time you ever hear of it is in negative terms. It’s all very well saying we are going to be open but unless someone actually is out in the forefront and pushing this it will go unnoticed. I very much doubt that this will ever be seen by anyone outside of the industry.”*

*“I don’t believe there will ever be complete openness regarding what goes on in animal research laboratories.”*

### **Legislation (7%)**

A number of comments indicated that a voluntary agreement of openness standards by the sector was insufficient as it was self-policing, and that openness should instead be covered purely by legislation. These comments referred to the Freedom of Information act and to section 24 of the Animals (Scientific Procedures) Act, which covers confidential information contained in project licences.

*“The degree of openness will be determined by establishments themselves and so there will be a bias in favour of promoting the supposed benefits of animal research, with omissions concerning the likely distress and suffering that has or will be caused to the animal. Commitment 1 will therefore not provide true openness. Establishments should instead support the repeal of section 24 and make all information and data concerning research publicly available, unless there are legitimate confidentiality issues, which would be protected by the Freedom of Information Act.”*

*“Project licenses should be made publicly available as well as all of the due processes that have been arrived at e.g. Home Office approval, how animal welfare is monitored within the research unit, involvement of vets and technicians who ensure that the LEGALLY approved experiments are done in the most humane way possible. i.e. break down this assumption that us scientists are unconstrained.”*

### **Stop Animal Research (6%)**

A small number of responses simply stated their opposition to research using animals.

*“I do not agree with any animal being tested on ....in this day and age there must be other ways ...It is cruel torture.”*

### **Survey (4%)**

A small number of responses were critical of the structure and scope of the consultation survey.

*“The wording of your questions are directive, meaning they lead to an extremely limited range in response, answers that clearly you wish to have stay within a narrow scope. I do not find such surveys useful, except to be used for one's own support of an action, rather than true edification.”*

## Responses to commitment 2

### *We will enhance our communications with the media and public about our research using animals*

*The purpose of this commitment is to ensure that relevant details about signatories' involvement in the use of animals in research are readily accessible by the public. It builds on commitment 1 by outlining some of the practical steps that organisations can take to facilitate their communications around animal research.*

a) *By the end of 2014, we will either:*

- *Make available on our own website a policy statement about the use of animals in research, providing clear information about the nature of our own involvement with animal research and its role in the wider context of our research aims, and link this to a central portal, publically available on the Understanding Animal Research website. Or*
- *Provide this information to UAR for inclusion in the portal.*

Respondents were asked on a Likert scale whether they agreed or disagreed that this proposal was key, insufficient or realistic for openness to be achieved. There was a greater spread of responses than for commitment 1.

The modal response:

- **agreed** that the proposal was key to openness (36%)
- **tended to disagree** that the proposal was insufficient (30%)
- **tended to agree** that the proposal was realistic (40%)

b) *We will include information in relevant communications, including press releases; on the role animal research has played in scientific advances and product development.*

The modal response:

- **agreed** that the proposal was key to openness (46%)
- **BOTH disagreed AND tended to disagree** that the proposal was insufficient (32% / 32%)
- **tended to agree** that the proposal was realistic (41%)

c) *We will identify a point of contact for information about the organisation's involvement in the use of animals in research and will aim to provide one or more spokespeople to talk about this use.*

The modal response:

- **BOTH agreed AND tended to agree** that the proposal was key to openness (38% / 38%)
- **tended to disagree** that the proposal was insufficient (31%)
- **tended to agree** that the proposal was realistic (36%)

d) *We will support and encourage researchers and staff who wish to engage with the media where this does not conflict with normal operational procedures.*

The modal response:

- **agreed** that the proposal was key to openness (40%)
- **tended to disagree** that the proposal was insufficient (31%)
- **tended to agree** that the proposal was realistic (37%)

- e) *Those of us that have animal research facilities in the UK commit to considering reasonable requests from accredited media organisations for access to view laboratories, subject to appropriate measures. Each organisation will nominate a point of contact to coordinate responses to requests for access to the media.*

The modal response:

- **agreed** that the proposal was key to openness (39%)
- **tended to disagree** that the proposal was insufficient (31%)
- **tended to agree** that the proposal was realistic (34%)

- f) *Signatory universities, pharmaceutical companies, learned societies and research funders will encourage researchers to follow acknowledged best practice when publishing the results of their animal research (e.g. the principles enshrined in ARRIVE, ILAR, ICLAS and GSPC guidelines)*

The modal response:

- **agreed** that the proposal was key to openness (43%)
- **disagreed** that the proposal was insufficient (32%)
- **tended to agree** that the proposal was realistic (35%)

- g) *Signatory universities, pharmaceutical companies, learned societies and research funders will support the work of the NC3Rs and will share their own examples of progress in the 3Rs.*

The modal response:

- **agreed** that the proposal was key to openness (47%)
- **disagreed** that the proposal was insufficient (33%)
- **tended to agree** that the proposal was realistic (38%)

## Comments on commitment 2

There were 98 individual comments made on commitment 2. These were analysed and coded into categories (some responses fell into more than one category).

### This is not 'true' openness (19%)

Most of these comments indicated that words such as 'encourage' were too soft, and that adhering to a voluntary code of practice meant organisations would be able to choose which aspects of their work to be open about. Some comments felt that openness should include product labelling so that it is clear where animals have been used.

*"Openness and engagement with the media is key but this needs to be full and unbiased reporting, including the limitations of research and acknowledge that while animal use is necessary it also involves unavoidable suffering. 'Encouraging' others to follow best practice is insufficient. It should be mandatory and those not following best practice are unlikely to be open about why they choose not to."*

*"The term 'reasonable request' is open to wide interpretation; a request may be reasonable to one party but not another. A definition of 'reasonable' may be needed or guidelines of the type of requests that can be made."*

### **3Rs, guidelines and practices included (18%)**

A range of comments considered the relevance of the 3Rs, guidance such as the ARRIVE guidelines and the relevance of commitment 2 to non-medical research such as conservation and welfare of domestic animals. Some felt that these issues were important to the concordat, but others felt that they were separate issues to openness. Others were in favour of openness, but took issue with associations with ARRIVE guidelines or the 3Rs.

*“3Rs, while important, are not an openness issue”*

*“Very positive about supporting the work of the NC3rs, but not clear how this will translate into action”*

### **Barriers to openness (16%)**

These comments considered specific barriers that may need to be addressed in relation to commitment 2, such as practicalities of who should speak to media and the resources required to facilitate these practices. Included in this category were a number of comments about who the appropriate spokespeople should be.

*“Multiple requests for access to facilities from the media may result in resources being used to show people around when that resource should be doing other things.”*

*“I am doubtful whether the majority of the media will take up the opportunity to visit animal facilities, I think this will have to be actively encouraged.”*

*“One person should not be responsible for everyone; each senior PI must be prepared to engage. However it is also imperative that the media are educated such that they provide accurate reports and not just sensational pop science which has been my experience with the media.”*

### **Trusting the media (14%)**

Most of these comments expressed concern at the way media sensationalise stories, and felt that stories are rarely presented accurately or fairly. There were concerns that those opposed to animal research might pose as media to gain access to facilities, or that reporting may distort the facts. Others felt that media access to animal facilities was the only way ‘public’ could know what happens inside them.

*“Media outlets themselves must themselves make some sort of declaration to report on these matters accurately, too much coverage is currently concerned with manufactured controversy aimed at creating traffic for their publications.”*

*“I care more about the media being able to laboratories to see what's going on, than I do about being able to visit myself or for companies to put info up on a website. If journalists can't get in then it can never be open.”*

### **Openness will lead to ‘targeting’ (14%)**

Comments in this section expressed concerns that speaking about animal research would make a named spokesperson a target, and would highlight the areas where animal research takes place. A number of the comments indicated that this was because of the threatening and intimidating actions of animal rights activists, who intimidated scientists and prevented openness.



*“The point of contact about such animal use is likely to become a target to animal rights activists. Security tips and relevant safety issues should be addressed.”*

*“I cannot imagine that a contact person would not be harassed. Indeed, at my institution I am banned from making any public comments about the ethics of animal research because of the security risk (unless the comments are cleared by our PR office). The true barrier to openness is not the attitude of scientists, but those of extremist antivivisectionists who justify criminal and harassing acts.”*

### **Public Attitudes**

A smaller number of the comments related to public perceptions of animal research, such as where the emphasis will be and how the subject of animal research should best be approached.

*“I think involving the public is absolutely key. There are many misconceptions about the use of animals in the research. What could help is to have photos from the laboratories on the websites, to show these are normal experimental rooms, not what some imagine to be likened to ‘The Saw (animal version)’.”*

*“A lot of this already happens and it is possible to find a lot of this information already if you go looking for it. I fear that it will get used in a negative way by people that are unwilling to contemplate the positives of animal research.”*

### **Legislation**

Some comments indicated that a voluntary code of practice was, by its nature, unenforceable and that openness should be governed through government legislation.

*“Establishments will decide, as they currently do, what information is made available to the public and so Commitment 2 will not increase openness. Establishments should instead support the repeal of section 24 and make all information and data concerning research publicly available.”*

*“The only way to prove to the public that this is serious is by repeal of Section 24. Nothing in this commitment 2 shows intention to give proper and full information freely available.”*

## Responses to commitment 3

*We will be proactive in providing opportunities for the public to find out about research using animals*

*The majority of people in this country do not have ready opportunities to learn about and discuss the use of animals in research. This commitment aims to encourage more public discussion in the UK about animal research. It builds on commitments 1 and 2 by describing ways in which signatories can engage proactively – directly and indirectly – with the public, over and above the provision of information.*

- a) *We will work cooperatively to provide more comprehensive explanations of animal research projects and procedures. These explanations should, where appropriate, include images and films; they should be presented either as stand-alone materials or accompanying other communications, such as press releases and should include information about the context of the research.*

Respondents were asked on a Likert scale whether they agreed or disagreed that this proposal was key, insufficient or realistic for openness to be achieved. There was a greater spread of responses than for commitment 1.

The modal response:

- **agreed** that the proposal was key to openness (39%)
- **tended to disagree** that the proposal was insufficient (32%)
- **tended to agree** that the proposal was realistic (40%)

- b) *Where relevant, representatives of signatories will include information about the role of animals in any talks or public events they take part in, for example at schools or with the local community.*

The modal response:

- **agreed** that the proposal was key to openness (43%)
- **disagreed** that the proposal was insufficient (33%)
- **tended to agree** that the proposal was realistic (43%)

- c) *Signatories that have animal research facilities in the UK will consider including their animal facilities in any visit to the organisation from representatives of the local community and other organisations or external individuals.*

The modal response:

- **Tended to agree** that the proposal was key to openness (38%)
- **tended to disagree** that the proposal was insufficient (31%)
- **tended to agree** that the proposal was realistic (28%)

- d) *Signatories that do not have animal research facilities in the UK will consider ways in which they can facilitate the activities mentioned in points 1-3 above, and other ways that will encourage public engagement with the issue of animals in scientific, veterinary and medical research.*

The modal response:

- **Tended to agree** that the proposal was key to openness (34%)

- **Felt it was neither** that the proposal was sufficient nor insufficient (32%)
- **tended to agree** that the proposal was realistic (30%)

### Comments on commitment 3

There were 97 individual comments made on commitment 3. These were analysed and coded into categories (some responses fell into more than one category).

#### Considerations (23%)

These comments were about how the commitment could be achieved and details that should be considered for these proposals to be workable. They included suggestions about conducting tours, outreach and school visits and general comments on how the Concordat could be made workable. Some felt that allowing access to facilities and providing information such as data and photographs would only be helpful if all requests were granted and all materials were published.

*“While we are willing to talk to schools, very few of them appear to have time in their schedule to discuss science at all, let alone the ethics of animal research. Sorry to sound so negative, but we have tried and failed repeatedly to engage schools.”*

*“The facility visits is a good idea but the implementation of that might not be so easy. It might be interesting to consider the organisation of educational events which would include virtual visits of facilities as well as scientific presentations on the use of animals in research and the efforts undertaken to replace, reduce and refine their use. This would actually show that the vast majority of labs involved with animal research are also working with in vitro models – which are rarely explained to the public - and also provide a great opportunity to give a more realistic perspective on the current place of in vitro methods.”*

#### Unintended consequences (22%)

A number of these comments focused on the ease with which images, data or other materials might be misinterpreted by members of the public, especially if delivered by ‘untrained’ researchers, or manipulated so that their meaning becomes altered. This would lead to an unintended consequence of a less informed public. Others felt that the information would need to be sensationalised to be of interest to the public, and that practices might start to focus on the public interest rather than that of the animals. Some considered other unintended consequences of the outreach, such as normalising cruel practices in the eyes of the public.

*“I agree that education is key to understanding why animals are used in research. However, caution should be taken when using images and films as these can be very emotive. Context to these images and films is crucial.”*

*“Giving talks to a scientific audience is one thing, but presenting on animal experimentation to the public should only be undertaken after training in appropriate presentation skills and personal rights regarding such presentations. I also question the validity of signatories without training and staffing associated with experimental work acting as advocates. They may not have the relevant insight to act as public spokespeople on our behalf.”*

*“My only concern about opening up facilities to the public is that they may become designed more for ‘human’ eyes rather than animal welfare.”*

### **Restrictions on access (18%)**

These comments considered the practical difficulties of allowing visitors into animal facilities noting that there are costs associated with such visits, that many staff are wary of potential security breaches, that animal welfare and biosecurity need to be considered, and that public access will never be practical in all facilities because of the nature of some of the work.

*“having an open-door policy and to embrace visitors is great but there is an underlying practicality to animal welfare and biosecurity containment which needs to be protected and this is then counter intuitive and remains sadly restrictive. New facilities with viewing galleries and CCTV viewing areas may assist and drive open door Q&A sessions with the public. e.g. schools.”*

*“Having worked in this field for 25 years I have found that a great majority of researchers would (and do) like to talk about what they do but this has to be done without any fear of recrimination and, sadly, there is often a perceived risk in being open (real or imagined). Proposals for inviting people into units are unrealistic (sadly).”*

### **Public relations exercise (17%)**

These comments either focussed on the idea that commitment 3 was a pro-research PR exercise with no relevance to openness, or on the idea that the facilities could pick and choose what they showed to give a sanitised account. Some indicated that the vague terminology in the Concordat made the commitment easy to avoid when inconvenient. Others felt that for openness facilities would need to be prepared to show animals that are suffering during procedures.

*“What motivation is provided here for signatories to do anything but hide the distasteful, dangerous, cruel or wasteful aspects of their research activities and display only the aspects of it which are sanitized and non-controversial? It seems little more than a PR exercise.”*

*“It's all a bit vague, 'could' and 'should' and 'consider including' which makes Commitment 3 much too easy to ignore.”*

### **Benefits of openness (10%)**

These comments expressed the importance of this commitment to the openness agenda and a belief that access to animal facilities and community engagement are important and positive experiences.

*“If people can't see into the facility they will automatically assume you are hiding something.”*

*“Proactive engagement of your local community has many benefits, besides countering animal rights mis-truths it also garners support... Having organised facility visits and talks to local groups I have universally found them to be positive experiences, there are a small minority who will always disagree but the majority are supportive given the balanced information.”*

### **Unnecessary (10%)**

These comments indicated that commitment 3 would make little or no difference due to an indifferent public or because scientists cannot be trusted regardless of the commitments they sign up to.

*“There will never be complete openness regarding what really goes on in animal research laboratories.”*

*“In my opinion there are already many ways that the public can find out about the use of animals in research if they are bothered to do so.”*

### **Section 24 and legislation (7%)**

A small number of comments felt that openness could not be achieved while section 24 remains in place and that this made the commitment irrelevant.

*“Providing video and photos of animal research – and permitting visits from external groups – can only achieve openness if establishments provide information on, and access to, ALL experiments undertaken. Commitment 3 will not provide true openness. Establishments should therefore support the repeal of section 24 and make all information and data concerning research publicly available.”*

*“It is inconsistent for animal research establishments that sign up to the concordat not to support the repeal of section 24 and to withhold any animal research information and data, excepting that which is confidential. Commitment 3 will not provide true openness unless establishments provide information on, and access to, all experiments undertaken.”*

## **Responses to commitment 4**

### ***We will report on progress annually and share our experiences***

*Monitoring the implementation of the Concordat will be important for its success. We want to be able to demonstrate and share the progress we have made towards being more open about research using animals in the UK and improving the information that is available to the public. We will also review the Concordat and our own processes to keep them up to date.*

- a) *We will report to UAR annually on actions we have taken to fulfil these commitments and will share our experience of the effectiveness and impact of the strategies we have adopted.*

Respondents were asked on a Likert scale whether they agreed or disagreed that this proposal was key, insufficient or realistic for openness to be achieved.

The modal response:

- **tended to agree** that the proposal was key to openness (47%)
- **tended to disagree** that the proposal was insufficient (29%)
- **tended to agree** that the proposal was realistic (41%)

- b) *UAR will publish an annual update on progress on openness, collating the reports provided by signatories.*

The modal response:

- **tended to agree** that the proposal was key to openness (36%)
- **tended to disagree** that the proposal was insufficient (31%)
- **tended to agree** that the proposal was realistic (39%)

- c) *Three years after publication, we will review this Concordat and its impact and amend the document as necessary.*

The modal response:

- **agreed** that the proposal was key to openness (39%)
- **tended to disagree** that the proposal was insufficient (30%)
- **tended to agree** that the proposal was realistic (39%)

### **Comments on commitment 4**

There were 51 comments made as responses to commitment 4. These were analysed and coded into categories (some responses fell into more than one category).

### **Discussion**

In each of the comments sections a small number of comments related to the idea that openness around the use of animals in research should be legislated and required to be reported. As legislation around the use of animals in research comes under the remit of the Home Office, this falls outside the scope of the Concordat and the present consultation.