



Home Office

# Triennial Review of the Animals in Science Committee

July 2014

## Triennial Review of the National DNA Database Ethics Group, Animals in Science and Advisory Council on the Misuse of Drugs

As part of the Government's commitment to ensuring that Non-Departmental Public Bodies (NDPBs) continue to have regular independent challenge, the Home Secretary has announced that a review of the National DNA Database Ethics Group (NDNAEG), Animals in Science Committee (ASC) and Advisory Council on the Misuse of Drugs (ACMD) will take place.

A Triennial review is the process for reviewing the form and function of Non-Departmental Public Bodies, the appropriateness of the body's delivery mechanism and its governance arrangements.

The aims of a Triennial Review are:

- a) to provide a robust challenge of the continuing need, in terms of both their form and functions, for individual NDPBs; and
- b) where it is agreed that a particular body should remain as a NDPB, to review:
  - the control and governance arrangements in place to ensure it is complying with recognised principles of good corporate governance, including an assessment of its performance; and
  - its capacity for delivering more effectively and efficiently, including identifying potential for efficiency savings and its ability to contribute to economic growth.

Cabinet Office has published detailed guidance on the process and background for Triennial Reviews, which can be accessed on gov.uk through this [link](#).

We are inviting views on the continuing need, in terms of both their form and functions, for each of these bodies.

**You can respond online, or by post or e-mail completing the form below and sending it to the address below. The closing date is 5pm on 19 August. Any responses received after this time will not be considered.**

**For more details contact:**

Tom Dooley/Ben Foyle  
Home Office  
3<sup>rd</sup> Floor Seacole,  
2 Marsham Street  
London, SW1P 4DF

Email: [triennialreviews@homeoffice.gsi.gov.uk](mailto:triennialreviews@homeoffice.gsi.gov.uk)

## **Animals in Science Committee**

The Animals in Science Committee roles are:

- to advise the Secretary of State on all matters concerning the use of animals in scientific procedures;
- to advise animal welfare and ethical review bodies on sharing best practice within the UK; and
- by exchanging information within the European Union to co-ordinate best practice.

The Animals in Science Committee is responsible for providing impartial, balanced and objective advice to the Secretary of State, to animal welfare bodies and within the European Union on issues relating to the Animals (Scientific Procedures) Act 1986 as amended.

The Animals in Science Committee is an advisory non-departmental public body of the Home Office. The Chair, Dr John Landers, and all members are appointed by the Home Secretary, in accordance with the Commissioner for Public Appointments' Code of Practice.

The Animals in Science Committee was established by the Animals (Scientific Procedures) Act 1986 as amended to comply with Directive EU 2010/63/EU which came in to force on 1 January 2013. Article 49 of this Directive requires each EU country to set up a National Committee for the Protection of Animals used for Scientific Purposes. In this country the committee is known as the Animals in Science Committee and has superseded the Animal Procedures Committee.

Further information on the Animals in Science Committee can be found on their website <https://www.gov.uk/government/organisations/animals-in-science-committee>.

**Questions**

- 1. To what extent do you agree or disagree that there is a need for a body to provide advice to Government on all matters concerning the use of animals in scientific procedures?**

Strongly agree	x
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

Please explain your answer in the box below (feel free to attach another sheet clearly marking which question you are answering):

We regard it as essential that Government receives appropriate, informed, impartial, independent and current advice on the use of animals in research. This is an important issue for science and society. Guidance, technical expertise and judgement are needed to facilitate Home Office, local welfare body and European Union interactions and inform decisions.

Scientific developments (including advances, needs, and developments facilitating the 3Rs), the impact of the regulatory environment and objections to the use of animals in scientific procedures should all be considered on a regular basis in the formulation and implementation of policy.

- 2. To what extent do you agree or disagree that there is a need for a body to advise animal welfare bodies on sharing best practice within the UK?**

Strongly agree	
Tend to agree	x
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

**3. To what extent do you agree or disagree that there is a need for a body to co-ordinate best practice by exchanging information within the European Union?**

Strongly agree	x
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

Please explain your answer in the box below:

The broad range of practice in the EU should become harmonised under 2010/63/EU Directive. This includes harmonisation in important areas including training and severity assessment. Sharing information on how best to achieve this and achieving the best standards will be important in understanding the EU research landscape, as well as for the UK to show leadership. Having a central body to help assess the supporting information for these communications should facilitate development. A core theme of the EU Directive was to achieve harmonisation of procedures across the EU, and that aspect too requires close interaction between Member States and informed opinion from each member state being obtained and promulgated.

**4. To what extent do you agree or disagree that the advice should be independent of Government?**

Strongly agree	x
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

**5. Members of the Animals in Science Committee are appointed by Ministers from outside government in a personal capacity, because of their skills and experience in a relevant field. To what extent do you agree or disagree that members should be appointed in a personal capacity?**

When answering this question, please consider alternatives, such as members representing organisations, the private, voluntary or third sector, or government departments, and whether any of those alternatives might be more appropriate. The various alternatives are set out in more detail in the Cabinet Office document Categories of Public Bodies: a guide for departments [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/80075/Categories\\_of\\_public\\_bodies\\_Dec12.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/80075/Categories_of_public_bodies_Dec12.pdf).

Strongly agree	x
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

Please explain your answer in the box below (feel free to attach another sheet clearly marking which question you are answering):

It is important that members span the full range of expertise and experience to cover the topics in a manner that reflects national interests and represents the views of the public. Members of the committee should be appointed on the basis of their advanced knowledge and experience in a relevant field; representation of all constituencies involved in the use of animals in scientific procedures is needed. They must have the ability to reach an informed and balanced decision on the range of matters likely to come before the committee and bring up to date robust evidence to support their conclusions. Given that not all areas of expertise can be covered by permanent members, the ASC could consider co-opting individuals with working expertise and knowledge of a particular field as and when required.

Individuals rather than organisations should be the focus of the appointment. In order for the Committee to be able to work both confidentially and to take decisions, reference by members to external bodies (such as organisation with which they are associated, or ordinarily represent) for policy positions or advice would not be acceptable.

The committee has been fully formed for less than a year and therefore it is too early to fully assess the outcomes of the current arrangements. We have been in contact with the Chair, Dr John Landers, on a number of occasions since his appointment and he has been accommodating and open about the plans and progress of the group, which we have appreciated.

**6. To what extent do you agree or disagree that the role of the Animals in Science Committee could be provided by a different organisation?**

Strongly agree	
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	X
Don't know	

**7. To what extent do you agree or disagree that the role of the Animals in Science Committee could be done in a different way, for example, from within a government department, or by the third/voluntary sector, or the private sector?**

Strongly agree	
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	x
Don't know	

**8. Are you aware of any other bodies that perform similar functions?**

Yes	
No	x
Don't Know	

Please list the bodies in the box below (feel free to attach another sheet clearly marking which question you are answering):

Many bodies have overlapping interests and expertise but none has the required combination of breadth of opinion and level of independence.

**9. To what extent do you agree or disagree that the Animals in Science Committee could be merged with a similar body?**

Strongly agree	
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	x
Don't know	

Please suggest a similar body with which the Animals in Science Committee could be merged in the box below (feel free to attach another sheet clearly marking which question you are answering):

We do not believe that there is any suitable body.

10. There are three key reasons why a Non-Departmental Public Bodies NDPB should exist at arm's length from government. In order to be a NDPB, a public body must have met at least one of the following three criteria:

- it performs a technical function
- its activities require political impartiality
- it needs to act independently to establish facts

In 2010 the Government concluded that the Animals in Science Committee should be retained on the basis that it performs a technical function which needs external expertise to be delivered.

**To what extent do you agree or disagree that the Animals in Science Committee meets each of the criteria?**

- **it performs a technical function**

Strongly agree	
Tend to agree	x
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

- **its activities require political impartiality**

Strongly agree	x
Tend to agree	
Neither agree nor disagree	
Tend to disagree	
Strongly disagree	
Don't know	

- **it needs to act independently to establish facts**

Strongly agree	
Tend to agree	
Neither agree nor disagree	x
Tend to disagree	
Strongly disagree	
Don't know	

**Please tell us why you feel the Animals in Science Committee does or does not meet each of the criteria in the box below:**

In terms of performing a technical function, we agree that technical expertise is required for valid independent advice to be offered to government. However if offering decisions on highly specialised documents the Committee should be able to consult specialists in the particular field. The ASC has a role to play in bringing Animal Welfare Ethical Review Bodies (AWERBs) together, although this should not detract or undermine the AWERB's role of being the 'local' voice. As happens in human research ethics, AWERB chairs could be brought together in a more formal manner which facilitates sharing of best practice and knowledge transfer across AWERBs.

The ASC should aim to advance the sharing of information on best practice and thereby support developments in animal welfare. Doing so involves a range of information, both technical and non-technical (including public and political opinions) that have to be considered in reaching recommendations. It is therefore vital that the ASC can act independently both of those being regulated and of the regulatory bodies, including those that are providing facts and information. This also requires that they are politically impartial.

The ASC is required to give balanced and informed advice based on a broad range of evidence, which it should not be restricted from obtaining. Therefore its role is advisory and whilst it must scrutinise 'facts' presented to it, it should not become an investigative or policing authority.

As indicated above, given the recent creation of the Animals in Science Committee, it is too early to fully review these criteria in relation to its operation thus far. However we support its identity and existence as an advisory non-departmental public body.

We hope that attention can be given to resourcing so that the ASC is adequately supported to carry out their functions, including having capacity to access additional expertise on technical and other matters as necessary. We are aware that the relevant EU Expert Working Group is developing guidance on the composition, structure and functions of committees such as the ASC across the EU.

The Society of Biology welcomes the opportunity to respond to the Home Office on this matter.

The Society of Biology represents individual and organisational members (<https://www.societyofbiology.org/membership>) and members of the Animal Science Group (a Special Interest Group of the Society of Biology <https://www.societyofbiology.org/policy/asg/asg-membership>) are contributors to this response.

### **Animal Science Group Membership**

**Members:** Academy of Medical Sciences; Association of Medical Research Charities; Association for the Study of Animal Behaviour; Association of the British Pharmaceutical Industry; Biochemical Society; Bioindustry Association; Biotechnology & Biological Sciences Research Council; British Andrology Society; British Association for Lung Research; British Association for Psychopharmacology; British Neuroscience Association; British Pharmacological Society; British Society of Animal Science; British Society for Immunology; British Toxicology Society; Experimental Psychology Society; Institute of Animal Technology; Laboratory Animals Science Association; Laboratory Animals Veterinary Association; Medical Research Council; Nutrition Society; Physiological Society; Society for Endocrinology; Society for General Microbiology; Society for Experimental Biology; Society for Reproduction and Fertility; Understanding Animal Research; The Wellcome Trust.

**Observers:** British Neuropathological Society; British Society for Parasitology; National Centre for the 3Rs; Royal Pharmaceutical Society of Great Britain; The Royal Society; Science Media Centre; Universities Federation for Animal Welfare.

For any queries, please contact the Society of Biology Policy Team at Society of Biology, Charles Darwin House, 12 Roger Street, London, WC1N 2JU. Email: [asg@societyofbiology.org](mailto:asg@societyofbiology.org)