

## FOI response IMPFOI-24-158, Instances of non-compliance

Please see the table below for details of instances of non-compliance. All of which were identified by the establishment (Imperial) and self-reported to ASRU.

Date	Area of non-compliance	Description	No. of animals affected	Outcome
07/02/19	PIL Standard Condition 2 & 4(3)	Animals accidentally left in a recovery box overnight without food or water	2	<ul style="list-style-type: none"> <li>• ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action.</li> <li>• ASRU issued letter of reprimand to the PIL Holder</li> </ul>
25/03/19	ASPA 3(a) Regulated procedures conducted by a person without PIL authority	Blood sampling from animals undertaken by a person who had completed the necessary personal licence training and had applied for a personal licence, but this had not yet been granted	2	<ul style="list-style-type: none"> <li>• ASRU issued letter of reprimand to the PPL Holder</li> <li>• PPL required to re-train</li> </ul>
20/01/20	PIL Standard Condition 2	Animal left without food or water in a recovery box overnight	1	<ul style="list-style-type: none"> <li>• ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>• ASRU issued letter of reprimand to the PIL &amp; PPL holder</li> </ul>
07/07/20	PIL Standard Condition 2 & 14	Inadequate supervision of animal while under general anaesthesia	1	<ul style="list-style-type: none"> <li>• ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>• ASRU letter of Inspector advice issued to PIL holder</li> </ul>
06/08/20	PIL Standard Condition 2	Animals left without food and water for a period of up to 48 hours	2	<ul style="list-style-type: none"> <li>• ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>• ASRU issued letter of reprimand to the PIL holder</li> </ul>
22/10/20	PPL Standard Condition 1	Animals that had undergone surgery were found to have exceeded the 20-week time constraint specified in the protocol that they could be kept for, following surgery	35	<ul style="list-style-type: none"> <li>• ASRU required that both the PPL holder and PIL holders involved to undertake re-training within a three-month timeframe</li> </ul>

**FOI response IMPFOI-24-158, Instances of non-compliance**

01/02/21	PEL Standard Condition 4(3)	Animal left without food and water for a period of up to 48 hours	1	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PEL holder</li> </ul>
11/02/21	PPL Standard Condition 1	Animal was found to have exceeded an age limit constraint specified in the protocol	1	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PIL holder</li> </ul>
03/03/21	PEL Standard Condition 15 & 20	A PIL holder who had recently transferred from another establishment performed a surgical procedure on animals without having adequate training and competency records in place at the new establishment	6	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU issued letters of reprimand to the PEL, PPL and PIL Holders</li> </ul>
11/06/21	PIL Standard condition 19	A PIL holder exceeded the maximum limit specified in the PPL for the number of intra-peritoneal injections administered to animals	6	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PIL holder</li> </ul>
18/06/21	PPL Standard Condition 1 & 19	A second person was not present during a surgical procedure carried out on an animal when a neuromuscular blocking agent was being used	1	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PPL &amp; PIL holder</li> </ul>
17/01/22	PPL Standard Condition 1	The number of animals used on one protocol exceeded that authorised on the licence	289	<ul style="list-style-type: none"> <li>amendment request submitted to increase the number of animals permitted on the protocol</li> <li>amendment granted</li> <li>ASRU Inspector advice letter sent to the PPL holder</li> </ul>
31/03/22	PPL Standard Condition 1	Animals exceeded authorised age limit on a breeding and maintenance protocol	17	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PPL holder</li> </ul>

**FOI response IMPFOI-24-158, Instances of non-compliance**

23/04/22	PEL Standard Condition 4(5)	Failure of a member of staff to check cages of animals in a room assigned to them over a weekend	9	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PEL holder</li> </ul>
07/07/22	PEL Standard Condition 4(3) & 4(5)	Daily checks failed to identify animals present in a cage and they were left without water	5	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PEL holder</li> </ul>
09/07/22	PIL Standard Condition 2	A cage of animals was accidentally not returned to an isolator rack by the PIL following the undertaking of regulated procedures	3	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PIL holder</li> </ul>
07/09/22	ASPA 3(b), PIL Standard condition 1 & 19	Tumour cells were administered to animals via a route not specifically authorised in the protocol	30	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PIL &amp; PPL holders</li> </ul>
08/11/22	PIL Standard Condition 2	Animals being transported from their holding room died during the transfer	5	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PIL holder</li> </ul>
18/01/23	PPL Standard Condition 1	An animal was found to have exceeded an age limit constraint specified in the protocol	1	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PPL holder</li> </ul>
01/02/23	PPL Standard Condition 1	Animals exceeded the age limit authorised on a breeding and maintenance protocol	5	<ul style="list-style-type: none"> <li>ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li> <li>ASRU letter of Inspector advice issued to PPL holder</li> </ul>

**FOI response IMPFOI-24-158, Instances of non-compliance**

26/06/23	PIL Standard Condition 2, 14 & 19	A PIL failed to monitor animals at the frequency specified in the protocol	4	<ul style="list-style-type: none"><li>• ASRU content with the remedial actions taken and measures implemented to avoid recurrence and required no further action</li><li>• ASRU letter of Inspector advice issued to PIL holder</li></ul>
13/07/23	PPL Standard Condition 1 & 19, ASPA 3(b)	Minipumps were surgically replaced in animals but replacement of minipumps was not authorised in the protocol	8	<ul style="list-style-type: none"><li>• Amendment request submitted to permit the replacement of minipumps</li><li>• Request approved</li><li>• ASRU letter of Inspector advice issued to PPL &amp; PIL holders</li></ul>