

Department of Education

Animal Ethics System

Department of Education User Manual

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ANIMAL ETHICS - OVERVIEW

WHY SCHOOLS MUST APPLY TO USE ANIMALS

All schools must apply to the Schools Animal Ethics Committee (SAEC) to use animals for scientific activities because it is required by law. The SAEC has been established by the Department of Education in conjunction with the Catholic Education Office and the Association of Independent Schools WA (AISWA) to provide services to all schools to support them to meet their legislative responsibilities and demonstrate best practice animal care for their students.

In WA the welfare of all animals is regulated by the <u>Animal Welfare Act 2002</u> (the Act) which is most commonly associated with the RSPCA rescuing abused animals and prosecuting offenders. However, this legislation also regulates the use of animals for scientific testing and experiments by private companies, hospitals, laboratories, universities and schools. The Act requires that anyone using animals for scientific purposes (including teaching activities in schools) must adhere to the <u>Australian code for the care and use of animals for scientific purposes</u> (the Code).

THE CODE

The Code requires that all schools, universities and colleges must obtain the approval of an Animal Ethics Committee before using animals for any scientific teaching activity. The Code also specifies detailed requirements for standards of care, staff competency, accountability and reporting. Every procedure and reporting requirement stipulated by the SAEC directly corresponds with a requirement of the Code. Both the Animal Ethics System and this manual are designed to support schools and provide guidance about these requirements as the teacher and principal progress through the application and reporting processes.

Support Contact

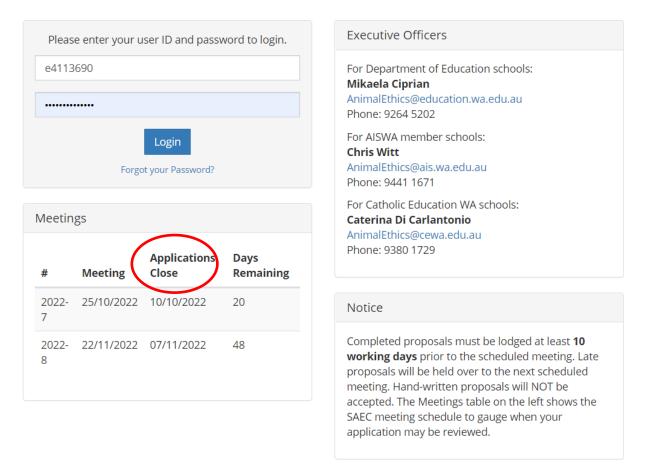
SAEC Executive Officer Department of Education Telephone: 9264 5202 Email: <u>AnimalEthics@education.wa.edu.au</u>

LOG ON

How to log on to the Animal Ethics System

1. Go to the Department of Education Animal Ethics webpage. <u>https://myresources.education.wa.edu.au/programs/animal-ethics/animal-ethics-system</u>

- 2. Select the Animal Ethics System resource page. Scroll down until you see the teal banner and press log in.
- 3. Log on with your E number and usual single sign-on password.



- Important
- 1. Approval can only be granted at the Schools Animal Ethics Committee (SAEC) meetings held in week 3 and week 8 of each term.
- 2. Make sure that you and your principal are aware of the application cut-off dates for each SAEC meeting.
- 3. You must wait to receive the approval notice after the SAEC meeting <u>before</u> <u>you commence</u> an activity.

Late applications: If applications have closed but the meeting has not yet been held, contact the SEAC Executive Officer to discuss your situation.

COURSE COORDINATOR ROLE

1 NEW APPLICATIONS



- **1.1 If this is your first time using the system** you will see the **Create a New Application** screen. Select from the drop-down boxes:
 - a) Activity Type: templates are provided for common activities undertaken in schools with example responses to assist you with the application. If your activity isn't listed, select 'Other'.
 - **b) Animal:** you must select from this list. If your animal is not listed, contact the SAEC Executive Officer to discuss if an application is required.
 - c) Create Application: takes you to the first screen of the process Staff Details.

Applications - Logout

Create a New Application	
--------------------------	--

a) School

Carine Senior High School

b) Activity Type

Select Activity Type	`
Animal	
Select Species	

1.2 If you have used this system before the log-in screen lists your current applications. To start a new application, use the New Application button on the top-right hand of the screen.



1.3 To complete an application, work through each of the tabs across the top of the screen. It is not necessary to do all sections at once, the system will save a draft application and you can return to it later.

Sections 2 to 7 of this Manual provide instructions for each part of the process.

DRAFT					
Staff Details	Course Details	Ethics	Activity Details	Animal Management	Submit Application

2 STAFF DETAILS

The details and experience of <u>all staff</u> working with animals must be recorded. **2.1 Course Coordinator** is the teacher responsible for the activity.

- **2.2 Experience with Animals** is the information used to determine whether the person is experienced and competent to care for the welfare of the animals. It does not necessarily refer to teaching experience.
- **2.3 Other staff** includes other staff that may assist with the process. You must ensure you add another staff member in the event you are away.

Department of Applic	ations - Logout	Animal Ethi
RAFT		Carine Senior High Scho
itaff Details Course [Details Ethics Activity Details	Animal Management Submit Application
Course Coordinator	2.1	Other Staff 2.3
Name * Experience with Anim Example Response ~ I have successfully car activity three times pr	nals * , 2.2 red for animals and undertaken this	Will there be other teaching and general staff using or working with animals in this proposal? Yes No Name Position Experience with Animals Actions Add Staff Add Staff Add Staff
Current Position *		
Work Phone*	Mobile Phone	
9243 9100		
Email *		
kin@test.eo	ducation.wa.edu.au	
Update		

3 COURSE DETAILS

Only teaching activities under the Science strand require approval, as stated in the Code. Therefore, the **Learning Area** is always Science and the **Content Strand** is always Science Understanding: Biological Science. If you are not doing an activity under the Science strand then logout – approval is not required.



Each field in the Course Details screen must be completed.

- Year Levels single or multiple year levels can be entered depending on the activity.
- **Approval Period** approval can be given for 1, 2 or 3 years as requested. However, you will be required to submit animal ethics annual reports for the entire approval period. If you only undertake the activity in the first year and don't do it again, you still need to submit annual reports for the years you had approval.
- Animals used again? Only answer 'Yes' if the same animals will be used more than once each year or used in more than one type of activity e.g. "Bessie" the female rat will be used for a breeding activity for Year 7 in Term 1 and then again for Year 11 Biology in Term 3.
- The supplier details must be entered before an application can be completed.
- Course Content must be relevant to the year group. The default content is relevant to early childhood year groups but you can edit, delete or add content for older year groups. Ensure Item 6 is filled in.

Details	Supplier	
earning Area	Supplier *	
cience	Living Eggs	•
ontent Strand	Contact Person	
cience Understanding: Biological Science	Louise Pople	
ear Levels*	Work Phone	Email
Early childhood	0433 554 992	eggswa@livingeggs.com.au
pproval Period	Delivery Details *	
Three Years 🔹	Example Response ~	
pproval can be granted to repeat this activity each year for up to 3 years.		school and hatchlings picked up by provider.
/ill these animals be used again for another activity? *	Eggs will be delivered to the	school and hatchings picked up by provider.
No Yes		
Update Details		
	Update Supplier	
tent		
Course Content		
Observe the hatching of chicken eggs and compare the growth and changes by	drawing, discussing and writing about v	vhat is observed.
Use subject specific vocabulary for an authentic purpose.		
Understand and sequence the stages in the lifecycle of a chicken.		
Understand basic needs (food, water and adequate shelter) of animals and how	to care for them.	
Understand the relationship between structure and function eg. hard shell of eg	gg for protection, sharp tooth to crack s	hell in order to get out.
Educational purpose -Biological Science - Life cycle of a Chicken children learn a	bout how many days it takes for a chick	en to hatch and they can learn each day about w

is happening inside the egg as the chicken is growing. Kindy: (EYLF) 2.4 Showing social responsibility and respect for the environment. 2.4.3 Respecting, caring for and sustaining the environment. 4.2.2 Reflecting on learning and thinking and transferring and adapting what they have learned 5.1 Interacting verbally and non-verbally with others for a range of purposes. PP:Living things have basic needs, including food and water (ACSSU002) Y1:Living things have a variety of external features (ACSSU017) Y3:Living things can be grouped on the basis of observable features and can be distinguished from non-living things (ACSSU044)

4 ETHICS

Enter the number of animals you intend to use and the ethical justification for using these animals.

If this is a breeding activity you should include an estimate of the number of offspring. For example:

- For a chicken hatching activity you will order 10 eggs the number is 10.
- For a guinea pig breeding activity you will use a male and a female plus you could expect as many as 5 pups the number will be 7.

Staff Details	Course Details	Ethics	Activity Details
Ethical Cor	nsiderations		
Number of	Animals *		
Teachers <u>ma</u> expect to us	-	<u>nore</u> than t	he number request

The 3Rs are a fundamental concept in animal ethics. Any proposal for the scientific use of animals in Australia for education or research is required, by law, to prove that the 3Rs have been considered.

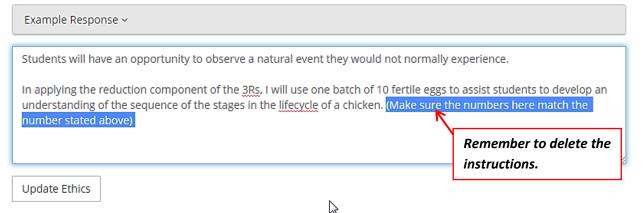
To consider the 3Rs ask:

- Could you teach this component of the curriculum just as well without using live animals? (<u>Replacement</u>)
- Have you <u>Reduced</u> the numbers to the absolute minimum necessary to achieve the educational outcomes?
- Can you further <u>R</u>efine the activity to minimise the impact on the animals?



Note: When you use the example response, the instructions in red italics convert to normal text. Remember to edit and delete the text that was in red italics.

Consider the 3 Rs framework of replacement, reduction and refinement to justify using these animals and for the number of animals being used. Refer to the information on the SAEC website.



5 ACTIVITY DETAILS

Click on the first row to Edit and complete the activity details: Start, End, Students. *Note:* The number of animals will already be entered if you correctly completed the previous Ethics screen.

Staff D	etails	Course Details	Ethics	Activity Deta	iils Anir	nal Manage	ment	Sub	mit Applicat	ion
Acti	ivity List									
stud	lents taki	n the first row to eo ng part. will automatically o							he number	of
#	Descrip	tion			Category	Animals	Start	End	Students	
1	Hatchin	g chicken eggs			3	10				:
2 Ac		ng chicks and basic the hatchlings /	handling, f	eeding and	2	10		Ed De	it lete	
		red data								

- Once entered, the activity details automatically carry down to the next row so that you do not have to enter the same details twice. Each row can be edited if required.
- **Note:** It is usual for an egg hatching project to commence on a Monday and continue until the following Friday which is 12 days including the weekend.

Edit Activity		×s					
Description		car					
Hatching chicken eggs							
Category							
	on to animal's condition or behaviour including hing and feed or environment manipulation.	✓					
Animals		Al	l details	automati	cally carry	ı down bi	ut
Students		са	n be edi	ted by clic	king on th	he row.	
31							
17/10/2016 End Date 28/10/2016	Staff Details Course Details Ethics Activity List Please click on the first row to edit or enter a students taking part. These details will automatically carry down to the students taking part.	o the next ro	ls such as th ow and can	be edited if ne	nd dates and t ecessary. *	mit Applicati	
	# Description	Category	Animals	Start	End	students	
	1 Hatching chicken eggs	3	10	17/10/2016	28/10/2016	31	:
	2 Observing chicks and basic handling, feeding and care for the hatchlings	2	10	17/10/2016	28/10/2016	31	:

6 ANIMAL MANAGEMENT

Good animal management practices are essential for the health and wellbeing of animals.

The members of the SAEC carefully consider the details in this section of the application to ensure that teachers will care for the animals appropriately.

- A considered response is mandatory for every question.
- Actions described here form an essential part of the approved activity.
- Ensure you contact the VET stated in your application to establish communication with them in the event you need to use them.



Example responses are a guide only. Teachers are expected to add or delete information to provide a considered response that reflects their activity. See the instance below where the Example Response has been edited to reflect the individual situation.

4

Possible health risks to students Identify the risk and describe precautions you may take.

Example Response ~	
Salmonella - prevention with basic standards of hygiene such as wa chickens. Allergies or Asthma (from feathers or dust associated with broood	с с
Please add precautions you may take for children with asthma Use this Response 1	Replace the example response with information relevant to your activity.
Salmonella - prevention with basic standards of hygiene such as wa chickens.	ashing hands before and after handling
We have one child with an allergy to feathers and precautions will t chicks and the parents are providing medication to be administered	

7 SUBMIT APPLICATION

- Click on View Staff Member Declaration and read the six points.
- Tick the "I have viewed and agree with the Staff Member Declaration box.
- Submit Application.

Department of Education	Applications 🗸	Logout			Animal	Ethics
DRAFT					Carine Senior High	school
Staff Details	Course Details	Ethics	Activity Details	Animal Management	Submit Application	
By submitting th following declara		ccept respo	onsibility as the sta	ff member in charge. You	must view and agree to the	
View Staff Me	mber Declaration~					
accordan 2. Ethical co 3. I will cont comparal 4. I accept r notifying described 5. I am awa <i>Animal W</i> 6. I am awa	ce with the guidelin onsiderations of this inue to seek alterna ble results to be ach esponsibility for ma the SAEC of any adv d in this proposal (S/ re that the use of ar <i>elfare (Scientific Purp</i>	es publishe teaching u itive metho ieved usin; intaining a verse event AEC Ameno imals for s oses) Regul de an activi	ed on the SAEC web init will be identifie ods which do not in g fewer animals; nimal use and heal is (SAEC form C2), c liment form); cientific purposes i <i>ations 2003</i> and that ty completion repo	vsite; d and addressed with the volve the use of living anir th records (SAEC form C1 hanges of personnel, met s regulated by the Animal it there are penalties for c rt (Form E) and an annual	or school developed form) hods or animal numbers	
♥ I have <u>viewer</u> ↓ Submit Applica	d, and agree with t ation	he Staff M	lember Declaratio	n		
The application will	be checked that all req	uired fields l	nave data.			

Completion

If you see the following message, then you have completed the process and your principal will receive an email notifying them of the application requiring approval.

×
ОК

Note: Principals receive a lot of emails, so it is worthwhile mentioning this application to them, in person, to ensure they don't miss the deadline for submission to SAEC

meetings.

WAITING

Mee	eting	Status	Actions
N/A		WAITING	:
		load Proposa	
	Delete	e Application.	

A successfully submitted application is listed as:

While an application is 'Waiting' you can still delete it by clicking on the Actions button. You can also download the application as a PDF file which can be printed.

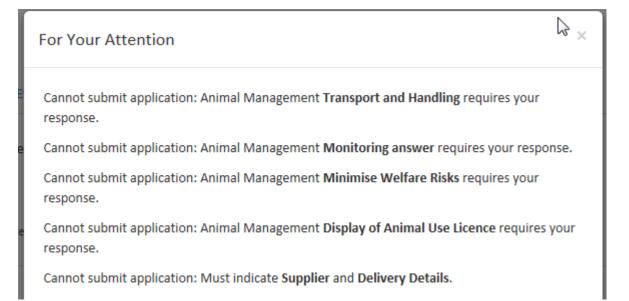
Note: once the Principal has reviewed the application and submitted it to SAEC the status

will change from 'Waiting' to 'Submitted'. A 'Waiting' application cannot be assigned a meeting and cannot be approved by SAEC. Check that your application has a 'Submitted' status at least the week before the next meeting, and remind your Principal to submit it as soon as possible if the status is still 'Waiting'.

8 CANNOT SUBMIT APPLICATION ERRORS

If you have not completed all required sections you will receive a 'Cannot Submit' message.

- The message names the Tab (e.g. Animal Management) and the section (e.g. Transport and Handling) where the information is missing.
- Go to the section and enter the details required.
- Update the section and select the "Save" button at the bottom of the page.
- Go directly back to Submit Application and repeat that process.



9 POST APPROVAL AMENDMENTS

Sometimes amendments need to occur. Contact the Executive Officer if you need to change any aspect of the application after approval is received.

For example, if the application states that animals are to be kept at school over the weekend, then <u>you do not have approval</u> to take them home instead.



Failing to seek and receive amendment approval prior to actioning the change will result in a breach notice.

10 ACTIVITY COMPLETION REPORT

If your application is approved, a completion report is required within 14 days of the end of the activity. To complete the report:

10.1 Log-in and Click on the Actions icon related to your recently completed activity.

0.2 Se	lect Ac	tivities							
Department Education	of Appli	ications - Logout						Ani	mal Ethics
New Ap	plication						Q Ente	er Search	Clear
Application	Animal	Purpose	Approval	Expiry	Teacher	School	Meeting	Status	Actions
D1607007	Chickens	Egg Hatching	25/10/2016	25/10/2019	Kate CASSIN	Allendale Primary School	2016-7	APPRO VED	I.
D1607008	Mice	Small Mammal Breeding	26/10/2016	26/10/2019	Kate CASSIN	Allendale Primary School	201	wnload Proposa ivities	al Report
D1608011	Chickens	Egg Hatching	01/11/2016	01/11/2019	Karen Yap	Allendale Primary School	2016-8	APPROVED	•
N/A	Fish	Other			Kate CASSIN	Allendale Primary School	N/A	SUBMITTED	

- **10.3** Your current activity will appear as a row with a start and end date, number of animals and students. A required completion report is indicated by a red cross.
- **10.4** Click on the Actions icon and select Completion Report.

My Applications	/ Allendale Primary School	l - D1607008 - Small Mai	mmal Breeding	
				Add Activity
Start Date	End Date	Animals	Students	Completion Report Valid
24/10/2016	28/10/2016	3	10	0
			25	◎ ⊘ □

10.5 Click anywhere on the row next to the animal name to edit the activity details. Editing is required if you used more or less animals than planned or if there were any deaths.

Animals									
Description	Cat. 1	Cat. 2	Cat. 3	Cat. 4	Cat. 5	Live Animals	Deaths	Students	Next Year?
ice الس	۲	0	0	۲	8	12	1	25	0

Edit A	ctivity Det	ail				×
Descri	ption					
Mice						
	Cat. 1 ®	Cat. 2 ©	Cat. 3 ②	Cat. 4 ම	Cat. 5 ®	
Live A	nimals					
12						
Death	_					
	5					
1						
Studer	nts					
25						
Arevo	u doing this	again next ye	ar?			
Are yo	a aong ans	again next ye				
Yes ৻৸	No					
0						
					Consul	
					Cancel S	ave

10.6 Enter comments in relation to any issues encountered or general comments and Submit. *Note:* All activity completion reports are tabled at SAEC meetings.

Description	Cat. 1	Cat. 2	Cat. 3	Cat. 4	Cat. 5	Live Animals	Deaths	Students	Next Year?
Mice	۲	ø	Ø	۲	۲	12	1	25	ø
Outcomes									
1 - Not Achie	eved 2 - P	artly Achie	-	s describe Mostly Ach	-	- Met all Objective	5 - Achie	ved more thar	n expected
))		ved 3-	Mostly Ach	hieved 4		s 5 - Achie	ved more thar	n expected
Any Issues? Yes No How were the The male att separated th	ey resolve tacked one ne male fro	ed or could of the pup	wed 3 -	Mostly Ach rented in t jured it. W	hieved 4 the future /e took the e will sepa		t it did not s before the p	urvive. We imi pups are born.	mediately A Form <u>C2</u> -

11 ADDING THE NEXT YEAR'S ACTIVITY TO A THREE YEAR APPROVAL

A 3 year approval for an activity means that you may undertake that activity again over the next 2 years without having to seek approval from the SAEC each time.

You must advise the SAEC each time you undertake the activity by adding a new activity into the system. This will ensure that the activity appears on your school's Annual Report each year.

11.1 Log-in to the system and click on the **Actions** icon next to the current application with the activity that you want to undertake again this year. Select **Activities**.

Department Education	of Appl	cations 👻 Logout						An	imal Ethio
New App	olication						C. Ent	er Search	Clear
Application	Animal	Purpose	Approval	Expiry	Teacher	School	Meeting	Status	Actions
N/A	Mice	Small Mammal Breeding			Mrs Jones	ABC School	NZA	DRAFT	I
N/A	Chickens	Egg Hatching			Mrs Jones	ABC School	N/A	DRAFT	
D1607007	Chickens	Egg Hatching	25/10/2016	25/10/2019	Mrs Jones	ABC School	2016-7	APPROVED	
D1607008	Mice	Small Mammal Breeding	26/10/2016	26/10/2019	Mrs Jones	ABC School	20	vnload Propos vities	al Report

11.2 You will now see a list of the previous activities undertaken under this approval. Select **Add Activity**

apartment of Applica	ations - Logout				An	nima
My Applications	s / Primary Schoo	ıl - D1607007 - Egg Hatc	hing			
					Add Activit	ty
Start Date	End Date	Animals	Students	Completior Report	n Valid	
Start Date 08/12/2016	End Date	Animals	Students			
				Report	Valid	

11.3 Enter the required information for the current year's activity and click on **Create Activity**.

Create a New Activity

Start Date	End Date
13/02/2017	24/02/2017
Animals	
10	
Students	
24	
Create Activity	

11.4 The activity will now appear at the top of the list of activities for this approval so that:

- you will be able to submit an activity completion report; and
- the animals used in this activity will automatically appear on the school's Annual Report.

					Add Activ
Start Date	End Date	Animals	Students	Completion Report	Valid
13/02/2017	24/02/2017 داس	10	24	۲	0
08/12/2016	22/12/2016	12	25	ø	0
01/02/2017	10/02/2017	10	22	۲	0

PRINCIPAL ROLE

12 PRINCIPAL'S RESPONSIBILITIES

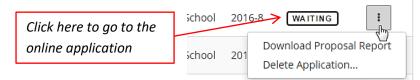
- **The principal is responsible** for ensuring that teachers adhere to the requirements of the SAEC which, in turn, ensures compliance with the Code.
- The principal must understand the teacher's proposal and their declaration. The principal is ultimately responsible to ensure the welfare of the animals and is required to declare that staff members are competent to care for the animals, not just competent to teach.
- **Support will be required.** Teachers can't usually leave the classroom, so if an animal becomes sick is there someone who can take it to a vet? If the teacher must come in to the school over the week-end to care for the animals, will they need special security access? Is there someone else who is competent to care for the animals if the teacher is unexpectedly absent during the period of the activity?
- **Breaches of the code must be reported** to the DPIRD, the regulator for the Animal Welfare Act 2002. Some breaches include:
 - o Commencing an activity before approval is received from the SAEC.
 - The DPIRD licence and SAEC approval documents are not on display.
 - In the case of an adverse event, not contacting the VET stated in the application.
 - A change or amendment to the activity that is not approved. For example, taking the animals home over the weekend when the approved proposal states they will stay on school grounds.

Contact the SAEC Executive Officer if you wish to change the application as some amendments can be approved quickly.

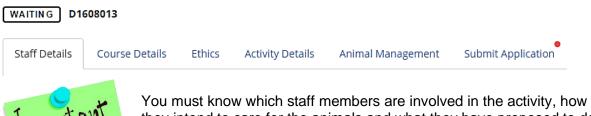
• Your school may be visited. The SAEC is required to inspect a number of activities each term and any school with an approved activity may be visited or asked to submit photographic evidence of the activity.

13 SUBMITTING APPLICATIONS

- **13.1 Email notification:** Principals receive an email when a teacher has prepared and finalised an application to use animals. The principal is the only person who can submit an application to the SAEC. This function is linked to their log-in and password.
- 13.2 Log-in to view your applications here: <u>https://apps.det.wa.edu.au/ane/</u>
- **13.3** Applications requiring your approval have a Status of 'Waiting'. You can either click on the 'Waiting' icon to go directly to the online application *OR* you can click on the Actions button and download the report to printout and read in hard copy.



13.4 To check the application online, read through each section of the application by clicking on the tabs across the top of the screen. A red dot indicates the area that requires your action.



You must know which staff members are involved in the activity, how they intend to care for the animals and what they have proposed to do with the animals because you are required to certify that they are competent. You should also be prepared to provide support if needed.

13.5 Select the **Submit Application** tab. Before you can submit the application you must view and agree with two declarations – the staff member's declaration and the principal's.

WAITING D1	508013					Allendale Primary Schoo
Staff Details	Course Details	Ethics	Activity Details	Animal Management	Submit Application	
By submitting	this application you	accept resp	onsibility as the sta	ff member in charge. You	must view and agree to t	he following declarations:
View Staff N	lember Declaration	/				
0 Debra Clarke a	greed with this on 28/1	0/2016				
☑ I have <u>view</u>	ed, and agree with	the Staff I	Member Declaratio	n		
	vou must also view a al Declaration~	and agree to	the following decla	arations:		
			-	s of educational value and als being used in this activ		r and assistants are competent in the
☑ I have <u>view</u>	ed, and agree with	the Princi	pal Declaration			
Submit Appl	ication					3
The application w	vill be checked that all re	equired <mark>f</mark> ields	have data.			

- **13.6** If successful you will see the following message: This application has been submitted to the SAEC for consideration.
- **13.7 Annual Reports** are required to be submitted at the end of each year. See Section 15 on Page 18 for more details.

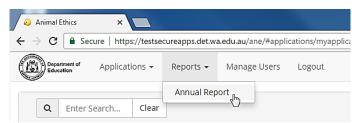
REPORTS

14 ACTIVITY COMPLETION REPORTS

Course Coordinators are required to submit an Activity Completion Report within 14 days of the end of the activity (See Section 9). This information is then automatically reflected in the school's Annual Report.

15 ANNUAL REPORTS

15.1 To submit an Annual Report go to the 'Reports' menu item.



- **15.2** The principal can add, delete or edit the pre-populated information on the report.
- **15.3** To finalise the report click on the "Submit Annual Report" button.

Animals											Add
Animal Species	Cat. 1	Cat. 2	Cat. 3	Cat. 4	Cat. 5	Prop. #	Live Animals	Deaths	Students	Continuing Next Year?	
Row add	ded h	ere								0	i
Chickens	۲	Ø	Θ	۲	۲	D1608006	5	0	5	Edit Delete	
Outcomes											
How well were t	he educat	ional obje	ctives de	escribed in	ı your p	roposal(s) achi	eved?				
1 - Not Achieved	2 - Parti	y Achieved	3 - Mos	stly Achiev	ed 4 - I	Met all Objective	es 5 - Achieved i	more than e	xpected		
Add te	xt hei	re									
Any Issues?											
Yes No											
How were they r	esolved o	r could be	prevent	ed in the	future						
One of our chick the bottom.	kens was <mark>k</mark>	illed and it	seemed	that it pok	ed its he	ad out through	a gap in the chicl	ken coop wi	re. We fixed t	he coop with solid sheeting a	around
Submission											
Submit Annual				ick H	_						

15.4 The principal will have to include non-compliant activities using animals for scientific purposes that did not receive SAEC approval in the Annual Report.

Rules related to Annual Reports:

- Only the Principal can submit an Annual Report.
- Only one report can be submitted for each school, each year. All animal use activities for the school should be shown on one report.
- If teachers have submitted their Activity Completion Reports as required, that data will be pre-populated in the report. Contact the teacher to submit their Activity Completion Report if their data does not appear on the Annual Report.