

Comprehensive List of Reportable Areas under the Animals (Scientific Procedures) Act 1986 (ASPA) and Amendments and recommended workarounds to improve and widen transparency in reporting to the public.

The Transparency Gap

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Comprehensive List of Reportable Areas under the Animals (Scientific Procedures) Act 1986 (ASPA) and Amendments

The report incorporates all possible reportable areas under ASPA. A column, Public Disclosure Status, has been added to each table. This indicates the extent of public availability based on official publications:

Fully Reported: Detailed, non-aggregated data made publicly available (e.g., per project or establishment specifics without anonymisation).

Partially Reported: Included in public documents but aggregated, anonymised, or summarised (e.g., in annual statistics, non-technical summaries [NTS], or Animals in Science Regulation Unit [ASRU] reports).

Undisclosed: Internal records only, not released to the public (protected under Section 24 of ASPA or for confidentiality reasons).

Public disclosures are limited: annual statistics provide national aggregates; NTS offer per-project overviews (prospective predictions and retrospective actuals, anonymised); ASRU reports summarise non-compliance anonymously.

And the workarounds to report to the public without breaking any data protection laws.

It just takes the will to do this and the change will transform the information available to the public.

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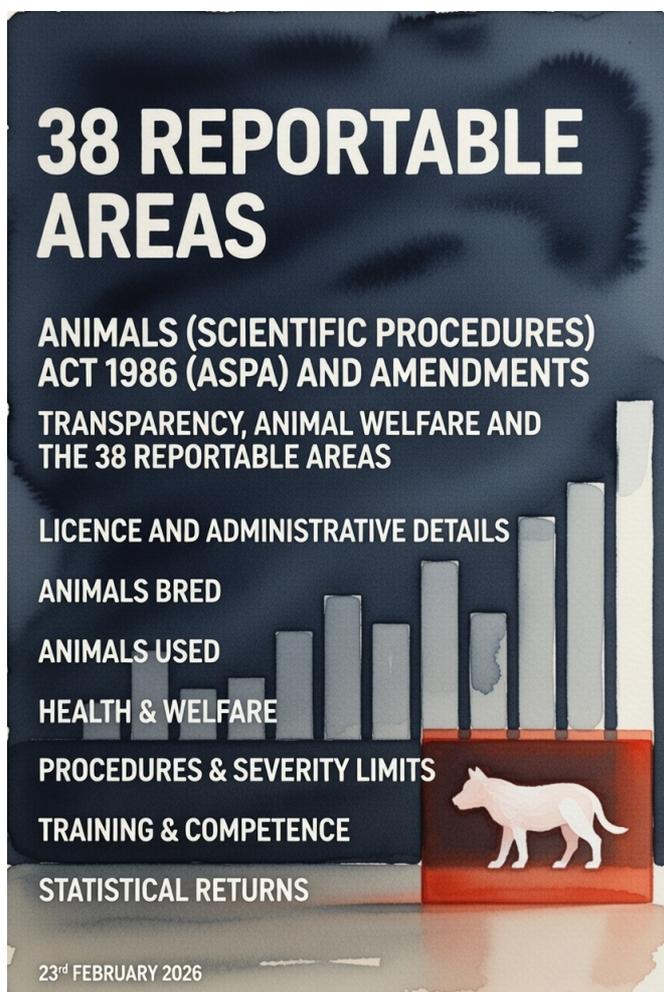
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Executive Summary: Comprehensive Reporting Under the Animals (Scientific Procedures) Act 1986 (ASPA) – The Case for Full Transparency Across 38 Key Areas

The Animals (Scientific Procedures) Act 1986 (ASPA), as amended (primarily in 2012 to transpose EU Directive 2010/63/EU), establishes a framework for the regulation of animal use in scientific procedures in the UK. It mandates detailed record-keeping and reporting across **38 distinct areas**, grouped into **seven core categories**:

1. **Licence and Administrative Details** (8 areas)
2. **Animal Breeding, Acquisition, Supply, Identification, and Genetics** (7 areas)
3. **Animal Use, Re-use, Transfers, and Disposal** (5 areas)
4. **Health, Welfare, and Care** (5 areas)
5. **Procedures, Severity, and Techniques** (6 areas)
6. **Training, Competence, and Supervision** (3 areas)
7. **Statistical Returns, Non-Compliance, and General Reporting** (4 areas)



These 38 areas collectively form the one of the most detailed, granular oversight system for animal research anywhere in the world. They capture **every stage of an animal's life** under the Act—from breeding and acquisition, through daily care, procedural use, severity experienced, and final fate (including rehoming), to the competence of personnel and institutional compliance.

They are however largely obscured from public view including lawmaker's such as Member's of Parliament.

Why Full Reporting on All 38 Areas Is Essential

- **Licence and Administrative Details:** Ensures accountability of establishments, project licence holders, and named persons (NACWO, NVS, etc.). Without visibility here, there is no way to confirm that ethical review (AWERB) and harm-benefit analysis are genuinely independent and robust.
- **Breeding, Acquisition, Supply, Identification, and Genetics:** Tracks origin, genetic status, and surplus production. Transparency here directly measures progress on **Reduction** (minimising numbers bred) and the shift to captive-bred primates and non-animal sources.
- **Animal Use, Re-use, Transfers, and Disposal:** Records actual use, re-use limits, and final outcomes (including rehoming and setting free). This is critical for verifying that re-use is genuinely exceptional and that rehoming as it applies to the Animal Welfare Act is maximised where feasible.
- **Health, Welfare, and Care:** Daily monitoring, veterinary records, adverse events, and environmental conditions. These records are the only proof that welfare standards are met in practice, not just on paper. The low level of inspections annually are insufficient guarantee the minimum standards.
- **Procedures, Severity, and Techniques:** Actual (not just predicted) severity, anaesthesia/analgesia use, humane end-points, and retrospective assessment outcomes. This is the **core evidence** of Refinement and the true extent of suffering inflicted.
- **Training, Competence, and Supervision:** Guarantees that only properly trained individuals perform procedures or kill animals. Transparency here protects both animal welfare and scientific validity. This is a vital component for public trust in the system.
- **Statistical Returns, Non-Compliance, and General Reporting:** Aggregates all data into annual returns and captures breaches. Full, timely reporting is the mechanism by which the public and policymakers can judge whether the system is working and whether the 3Rs are being delivered.

Without reporting on **all 38 areas**, the system is effectively self-policing and partial. Aggregated disclosure (the current standard) obscures trends, hides poor practice, and prevents meaningful public scrutiny or parliamentary oversight.

Immediate, Lawful Pathways to Greater Transparency

Enhanced public reporting on all 38 areas **can be implemented immediately** and **without breaching Section 24 of ASPA, the UK General Data Protection Regulation (UK GDPR), or the Data Protection Act 2018.**

- Section 24 only protects **confidential commercial information** and **personal data that identifies individuals or companies**. It does **not** prohibit anonymised, aggregated, or redacted publication of welfare, severity, rehoming, or procedural data.
- The Home Office/ASRU already publishes anonymised non-technical summaries (NTS) and aggregated national statistics. This proves that lawful disclosure mechanisms exist and are routinely used.
- Proven, immediately deployable workarounds include:
 - Publishing **fully anonymised establishment-level data** (e.g., “Establishment A: 12% severe procedures, 8% re-homed, 3 non-compliances on welfare monitoring”).
 - Expanding retrospective Non Technical Summaries (NTS) to include **actual severity breakdowns** and **3Rs outcomes** for every project (already required for severe, primate, dog, cat, and equine projects).
 - Requiring annual **establishment transparency reports** (voluntary or mandatory via licence condition) with redacted data e.g. universities.
 - Publishing **full anonymised severity bandings** per project or per establishment in the annual statistics.

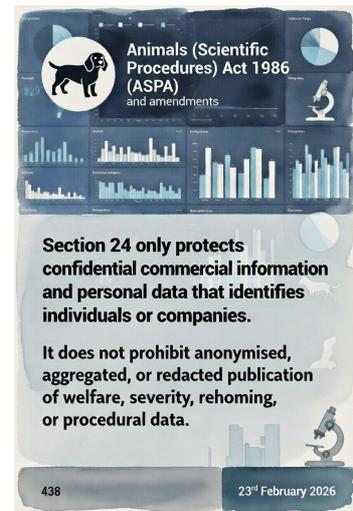
These measures require **no new legislation**, only policy decisions by the Home Office and willingness from licence holders. They have been successfully implemented in countries such as Switzerland, Belgium (Flanders), and New Zealand without legal challenge.

The UK already collects the most comprehensive dataset on animal use in science in the world. The barrier to genuine transparency is not legal—it is political and cultural. Publishing detailed, anonymised data across all 38 areas would:

- Restore public trust,
- Accelerate adoption of non-animal methods,
- Drive genuine Reduction and Refinement,
- And finally allow the UK to lead the world in ethical science.

The mechanisms exist. The data exists. The legal framework permits it.

All that is required is the decision to act—**now**.



The Workarounds

ASPA Compliance, Disclosure, and Transparency Framework

There are 38 areas that are defined by the ASPA that should be reported. Most of these are undisclosed for data protection reasons and the rest are partially disclosed. This report utilises clear headings, bolded key terms, and organises the content into the same framework applied to the ASPA as an Act.

1. License and Administrative Details

1a. License Holder Information

This area covers the basic administrative information related to the license holder under the Animals (Scientific Procedures) Act 1986 (ASPA) in the UK. It includes details like the names and qualifications of individuals or corporations holding the license, as well as any changes such as name alterations, deaths, or assessments of suitability for holding the license. These are foundational elements ensuring that only qualified and appropriate entities can conduct regulated procedures on animals.

Retention/Reporting Notes: Changes must be notified to the Animals Scientific Procedures Regulation Unit (ASRU) within 7 days, with a possible extension to 28 days. Records must be retained for 5 years. This ensures timely oversight and accountability, allowing regulators to maintain an up-to-date database and intervene if suitability issues arise.

Public Disclosure Status: Undisclosed.

Reason for Level: This information often involves personal or corporate identifiers, which could raise privacy concerns or security risks. Full disclosure might deter participation in licensed activities without adding significant public value, as the focus is on internal regulatory compliance rather than public scrutiny of individual identities. Instead, aggregated licensing statistics are reported elsewhere to show overall system integrity.

Suggested Workaround for Reporting: To enable public reporting, implement anonymised summaries in ASRU annual reports, such as aggregated statistics on the number of license holders, types of changes processed, and suitability assessments without revealing names or specific entities. This could be achieved through a policy amendment to ASPA, allowing redacted or pseudonym based data releases via Freedom of Information (FOI) requests, balancing transparency with privacy protections.

1b. Named Persons' Details

This refers to key personnel designated under ASPA, such as the Named Person Responsible for Compliance (NPRC), Named Animal Care and Welfare Officer (NACWO), Named Veterinary Surgeon (NVS), Named Training and Competency Officer (NTCO), and Named Information Officer (NIO). Details include their roles, qualifications, potential conflicts of interest, performance reviews, and any changes in their status.

Retention/Reporting Notes: Prompt notification of changes is required, along with annual reviews and declarations specifically for NVS and NACWO roles. This supports ongoing monitoring to ensure these individuals remain competent and unbiased in their welfare oversight duties.

Public Disclosure Status: Undisclosed.

Reason for Level: These details are highly personal, involving professional qualifications and potential conflicts that could expose individuals to privacy breaches or external pressures. Disclosure isn't necessary for public transparency, as the roles are internal to the establishment's operations, and the system's effectiveness is demonstrated through broader reporting on compliance and welfare outcomes rather than naming individuals.

Suggested Workaround for Reporting: Introduce voluntary public registries where named persons can opt-in to disclose anonymised profiles (e.g., qualifications and roles without personal identifiers) through a centralised ASRU portal. Alternatively, require aggregated reporting on role changes and conflict statistics in annual transparency reports, accessible via FOI, to provide oversight without individual exposure.

1c. License Conditions and Amendments

This area details the specific conditions attached to licenses, including full text of endorsements (e.g., approvals for Personal Individual Licenses or PIL categories by NTCO), as well as any suspensions, revocations, or representations made under Section 12 of ASPA (which allows for appeals or hearings).

Retention/Reporting Notes: Records must be kept available at all times, with changes notified and breaches reported to ASRU. This ensures licenses remain current and violations are addressed promptly to protect animal welfare.

Public Disclosure Status: Partially Reported (aggregated in ASRU annual report on licensing activities).

Reason for Level: Full disclosure could reveal sensitive operational or legal details that might compromise ongoing research or enforcement actions. However, partial, aggregated reporting strikes a balance by informing the public about the volume and nature of licensing activities (e.g., number of amendments or breaches) without exposing individual cases, promoting transparency on regulatory rigour while protecting intellectual property and security.

Suggested Workaround for Reporting: Expand the partial reporting by mandating the publication of redacted full texts of conditions and amendments (removing sensitive identifiers) in a public ASRU database, categorised by type.

This could be facilitated through updated guidance under ASPA, allowing stakeholders to submit FOI requests for specific cases with justifications, thereby increasing detail while maintaining necessary redactions.

1d. Establishment Premises

This covers the physical setup of licensed facilities, including schedules of areas designated for animal care, procedures, or killing; classes of premises; types of protected animals housed; and any modifications. It also includes security measures to prevent escapes.

Retention/Reporting Notes: Amendments require prior consent from ASRU, with a focus on security and escape prevention. This ensures facilities meet welfare and safety standards before changes are implemented.

Public Disclosure Status: Undisclosed.

Reason for Level: Details about premises layouts, security protocols, and animal types could pose significant risks if publicised. Public interest is better served through inspections and compliance reports rather than exposing site-specific vulnerabilities, maintaining a focus on overall welfare assurance without unnecessary exposure.

Suggested Workaround for Reporting: Develop standardised, high-level schematic templates for premises that omit security-sensitive details (e.g., general layouts and animal categories without addresses or specifics) and include them in aggregated ASRU reports. Encourage third-party audits with public summaries, or use FOI for redacted versions, to promote accountability without compromising safety.

1e. Project Programme of Work

This describes the core scientific aspects of research projects, including objectives, detailed protocols, animal descriptions (numbers, species, life stages, genetic status), locations (including Places Other Than Licensed Establishments or POLEs), harm-benefit analyses, application of the 3Rs (Replacement, Reduction, Refinement), predicted severities, anaesthesia/analgesia use, humane endpoints, and statistical designs.

Retention/Reporting Notes: Projects are reviewed by the Animal Welfare and Ethical Review Body (AWERB); amendments must be notified, and retrospective assessments are required for certain high-risk projects (e.g., those involving severe procedures or primates). This promotes ethical refinement and accountability post-approval.

Public Disclosure Status: Partially Reported (in Non-Technical Summaries or NTS per project: objectives, predicted/actual harms/benefits, 3Rs).

Reason for Level: Full disclosure might reveal proprietary research methods or intellectual property, potentially harming scientific innovation or competitiveness. Partial reporting via NTS provides the public with accessible, layperson-friendly insights into the purpose, ethical considerations, and outcomes of research, fostering trust and education without compromising sensitive details. This level aligns with ASPA's emphasis on transparency for accountability while protecting researchers.

Suggested Workaround for Reporting: Enhance NTS by requiring supplementary anonymised appendices with aggregated protocol data (e.g., statistical overviews of animal use without IP-revealing details) published on a public platform. Advocate for post-project open-access repositories where

completed studies voluntarily share full programmes after patent protections, or use targeted FOI requests for non-proprietary elements to build fuller public records.

1f. Personal Licence Work Logs

These are records of procedures performed under personal licenses, including animals used, supervision provided or received, and related activities.

Retention/Reporting Notes: Establishments maintain competence registers, with reviews required for licensees aged 70+ or retired. This ensures ongoing skill verification and prevents unqualified work.

Public Disclosure Status: Undisclosed.

Reason for Level: Logs contain detailed procedural data that could identify specific experiments or individuals, raising privacy and security issues similar to other personal records. Public value is low, as these are operational tools for internal compliance; broader transparency comes from project-level reporting, avoiding the need to expose granular, potentially traceable activity logs.

Suggested Workaround for Reporting: Aggregate log data into anonymised metrics (e.g., total procedures by category, supervision rates) and include them in ASRU's annual licensing activity reports. Implement a system for voluntary, redacted log sharing in peer-reviewed publications tied to projects, or respond to FOI requests with summarised, de-identified extracts to increase visibility without personal risks.

1g. AWERB Operations

This covers the functioning of the Animal Welfare and Ethical Review Body (AWERB), including membership, decisions, reviews of projects and 3Rs applications, advice on surplus animal minimisation, policies, conflict management, and training.

Retention/Reporting Notes: Minutes and advice must be recorded, which could inform broader transparency reports. This documentation supports ethical oversight and continuous improvement.

Public Disclosure Status: Undisclosed.

Reason for Level: AWERB discussions often involve confidential deliberations on ethics, science, and welfare, which could include sensitive unpublished data. Disclosing them might inhibit open debate or expose members to external backlash. Instead, the system's transparency is achieved through aggregated outcomes (e.g., in annual reports), ensuring public confidence in ethical processes without revealing internal mechanics.

Suggested Workaround for Reporting: Publish anonymised AWERB minutes with redactions for sensitive content (e.g., focusing on decision summaries and 3Rs advice) in a dedicated section of ASRU's website. Require annual aggregated reports on AWERB activities across establishments, and allow FOI access to non-confidential excerpts, fostering greater ethical transparency while preserving deliberation integrity.

1h. Fees and Billing

This area addresses financial aspects, such as periods covered by fees and payments made for licenses.

Retention/Reporting Notes: Failures to pay or comply are reported as non-compliance issues. This ties financial accountability to regulatory enforcement.

Public Disclosure Status: Undisclosed.

Reason for Level: Billing details are administrative and financial in nature, often involving private transactions that don't directly impact public understanding of animal welfare or research ethics. Disclosure could breach commercial confidentiality without adding value, as non-compliance is already flagged in broader regulatory reports, maintaining focus on welfare outcomes rather than monetary specifics.

Suggested Workaround for Reporting: Include aggregated financial data (e.g., total fees collected, non-compliance rates by category) in ASRU's annual financial transparency reports, without individual breakdowns. For public bodies, leverage FOI requests under the Freedom of Information Act 2000 to access redacted billing summaries, ensuring oversight on **public fund usage** while respecting private financial privacy.

2. Animal Breeding, Acquisition, Supply, Identification, and Genetics

2a. Numbers and demographics

This area encompasses quantitative and demographic data on animals involved in scientific procedures under ASPA. It includes counts of animals bred, acquired, supplied, used, re-used, discharged, died, or killed, broken down by species, sex, age, genetic status, and developmental stages (e.g., foetal or embryonic forms). For immature animals, data may be reported in batches rather than individually. This information forms the basis for annual statistical returns, providing an overview of animal usage to ensure compliance with welfare standards and the 3Rs principles.

Public Disclosure Status: Partially Reported (aggregated in annual statistics by species, genetic status).

Reason for Level: Aggregated reporting allows for public oversight of overall trends in animal use (e.g., reductions over time), promoting accountability and informing policy without revealing sensitive details about specific projects or establishments. Full disclosure could expose proprietary research volumes or patterns, potentially harming commercial interests or inviting targeted disruptions, while still meeting ASPA's transparency goals through high-level data that protects individual privacy and security.

Suggested Workaround for Reporting: Utilise the existing framework under the Freedom of Information Act 2000 (FOIA) by establishing a standardised template for aggregated data releases beyond annual statistics, such as quarterly summaries via the ASRU website. This could include anonymised breakdowns by research sector (e.g., academia vs. industry) without identifying establishments. To meet legal requirements, ensure all data is pseudonym based in line with the UK General Data Protection Regulation (UK GDPR), with ASRU acting as the data controller to handle FOI requests for more granular (but still aggregated) data, balancing transparency with exemptions under FOIA Section 43 (commercial interests) and Section 40 (personal data).

2b. Origins and Sources

This covers the provenance of animals used in procedures, including whether they were bred specifically for scientific purposes, details of suppliers (names and addresses), and exemptions for wild-caught or feral animals (with justifications and capture methods). For primates, there's an emphasis on captive-bred origins as a priority, along with compliance to Schedule 2 (which lists permitted suppliers and breeding requirements). This ensures traceability and prioritises ethical sourcing to minimise welfare impacts. This was a key issue when asked by the public under Freedom of Information requests. The information was not held centrally.

Public Disclosure Status: Partially Reported (aggregated place of birth by species in annual statistics; primate specifics).

Reason for Level: Partial aggregation protects supplier identities and commercial relationships, which could be sensitive due to potential boycotts or security threats from activists. It also safeguards intellectual property related to breeding programs. However, reporting primate details and overall origins supports public trust by

demonstrating adherence to ethical standards, such as the ban on wild-caught primates, without unnecessary exposure of operational specifics.

Suggested Workaround for Reporting: Implement a certification scheme under ASPA guidance, where suppliers must opt into a public registry listing anonymised origin categories (e.g., "UK captive-bred" vs. "imported") and compliance badges, published on the gov.uk portal. For legal compliance, integrate this with UK GDPR by compulsory agreement for data sharing and using FOIA to release redacted supplier lists upon request, invoking exemptions under FOIA Section 31 (law enforcement) if disclosure risks security. This enhances detail in annual reports while maintaining protections.

2c. Dates and Timelines

This group tracks chronological aspects, such as dates of animal acquisition, supply, the start and end of procedures, discharge, or death. Records must be contemporaneous (recorded in real-time) and retained for 5 years from the date of disposal. These timelines ensure accurate monitoring of animal lifecycles and compliance with license durations.

Public Disclosure Status: Undisclosed.

Reason for Level: Timeline data is highly granular and could, when combined with other information, reveal project specifics or operational patterns, posing risks to research confidentiality and security. Public value is limited, as broader welfare outcomes are captured in aggregated statistics, aligning with ASPA's focus on internal audit trails rather than public exposure of time-sensitive details that might not directly enhance transparency.

Suggested Workaround for Reporting: Develop an anonymised timeline audit tool within ASRU's e-licensing system, generating aggregated metrics (e.g., average procedure durations by species) for inclusion in annual reports. Legally, comply with UK GDPR by processing data as pseudonym aggregates, and respond to FOIA requests with redacted summaries (e.g., excluding identifiers), using Section 22 (information intended for future publication) to defer releases until annual cycles. This provides indirect transparency through trends without compromising individual records.

2d. Individual History Files

For specific species like cats, dogs, and primates, this includes detailed animal dossiers: identification methods (e.g., microchip or tattoo), birth date and place, breeding, reproductive, veterinary, and social history, plus involvement in procedures or projects. Files must be fully exchanged during inter-license transfers and copies retained otherwise, kept for 3 years post-death or transfer. This supports welfare continuity and traceability.

Public Disclosure Status: Undisclosed.

Reason for Level: These files contain sensitive personal data equivalents for animals (e.g., health histories) that could indirectly identify researchers or projects, raising privacy and security concerns under UK GDPR. Disclosure might also deter inter-establishment collaborations. The focus remains on internal welfare assurance, with

public transparency achieved via aggregated usage data rather than individual animal biographies.

Suggested Workaround for Reporting: Create a centralised, secure database under ASRU for anonymised history abstracts (e.g., aggregated health outcome statistics by species), accessible via controlled FOIA requests with data sharing agreements. Ensure UK GDPR compliance through data minimisation (e.g., excluding identifiers) and purpose limitation, treating animal data as potentially sensitive under ASPA's welfare provisions. This allows for voluntary sharing in scientific publications post-project, enhancing ethical oversight without full disclosure.

2e. Identification and Marking

This details methods for animal identification (prioritising least painful techniques), justifications for any non-marking, and requirements for cage labels (including project/protocol details, start dates, personal license holder names, and animal counts). Permanent marking is required for certain species, and unweaned animals are linked to their mothers. This ensures accountability and welfare monitoring.

Public Disclosure Status: Undisclosed.

Reason for Level: Methods and labels could reveal operational protocols or project details, risking intellectual property leaks or targeted interference. As internal compliance tools, their public disclosure adds minimal value compared to the potential for misuse, with ASPA emphasising practical welfare over public scrutiny of identification specifics.

Suggested Workaround for Reporting: Incorporate standardised identification summaries into AWERB annual reviews, with aggregated data (e.g., marking method frequencies and justification categories) reported in ASRU transparency documents. Legally, align with UK GDPR by anonymising data and using FOIA for redacted policy excerpts, invoking Section 36 (prejudice to effective conduct of public affairs) if needed. This promotes best practice sharing through guidance updates without exposing site-specific details.

2f. Breeding Strategies

This addresses efforts to minimise surplus animals, reviews of wastage, increasing captive-bred primates, and managing genetic alterations (classified by phenotype severity: mild, moderate, severe). It includes AWERB-approved policies and annual returns on animal creations. The aim is to align with 3Rs by reducing unnecessary breeding.

Public Disclosure Status: Partially Reported (aggregated genetic status and breeding purposes in annual statistics).

Reason for Level: Aggregation protects proprietary breeding techniques and genetic IP, which are crucial for research innovation, but does not allow public monitoring of trends like genetic alteration rates. Full details could invite ethical debates on specific programs and is this not in the public interest? Partial reporting demonstrates commitment to minimisation without undue exposure.

Suggested Workaround for Reporting: Expand annual statistics with voluntary case studies in ASRU reports, anonymising strategies (e.g., "successful surplus reduction via timed breeding") and sharing via open-access platforms. Comply with UK GDPR and Intellectual Property laws by redacting IP-sensitive elements, and facilitate FOIA access to non-proprietary policy templates, ensuring data is processed fairly under ASPA's ethical framework. This builds on existing partial reporting for deeper insights.

2g. Prohibitions and Exemptions

This covers absolute bans in the UK (i.e no use of strays, Great Apes, or animals for cosmetics/weapons testing) and requirements for justifications in exemptions (e.g., for non-purpose-bred or endangered species). Breaches must be reported, ensuring strict adherence to ethical boundaries.

Public Disclosure Status: Partially Reported (aggregated in ASRU non-compliance reports if breaches occur).

Reason for Level: Reporting only on breaches maintains focus on enforcement outcomes without pre-emptively disclosing exemptions that might involve sensitive justifications (e.g., conservation research). This protects ongoing work from public misinterpretation or backlash, while aggregation informs on system integrity, aligning with ASPA's punitive rather than proactive disclosure approach.

Suggested Workaround for Reporting: Mandate anonymised exemption summaries in annual non-compliance reports, categorising by type (e.g., "endangered species justifications approved: X cases"). Legally, adhere to UK GDPR by anonymising data and using FOIA for detailed but redacted breach investigations, with exemptions under Section 30 (investigations) to safeguard processes. This enhances proactive transparency through educational guidance on prohibitions, meeting legal standards without revealing case specifics.

3. Animal Use, Re-use, Transfers, and Disposal

3a. Use in Procedures

This group covers the application of animals in scientific protocols, including numbers and species per protocol, and rules for re-use (requiring veterinary consent, full health restoration, assessment of cumulative effects, and limits like a maximum of one severe procedure). It ties into annual returns and retrospective assessments of actual harms experienced, ensuring procedures align with ethical standards and the 3Rs.

Public Disclosure Status: Partially Reported (aggregated procedures by species/purpose in annual statistics; predicted/actual in NTS).

Reason for Level: Aggregation protects project-specific details that could reveal proprietary research designs or methodologies, potentially stifling innovation or exposing researchers to risks. Partial reporting via statistics and Non-Technical Summaries (NTS) provides public insight into usage scales and ethical justifications, fostering accountability without compromising confidentiality, as mandated by ASPA's balance of transparency and protection.

Suggested Workaround for Reporting: Leverage the existing NTS framework by requiring enhanced, anonymised appendices in project licenses that summarise re-use metrics (e.g., aggregated consent rates and cumulative effect categories) for publication on the ASRU website. Comply with UK GDPR through data anonymisation and purpose limitation, while using FOIA requests to access redacted protocol overviews, invoking exemptions under Section 43 (commercial interests) only when necessary. This builds on partial reporting to offer more granular trends without identifying specifics.

3b. Transfers and Movements

This involves the relocation of animals between licensed establishments or Places Other Than Licensed Establishments (POLEs), requiring consent, exchange of history files, and adherence to transport conditions under project licenses. It ensures welfare continuity during movements.

Public Disclosure Status: Undisclosed.

Reason for Level: Details could indirectly disclose research networks, locations, or project scopes, raising security concerns (e.g., transport routes vulnerable to interference). As operational logistics, public disclosure offers limited value compared to potential risks, with ASPA prioritising internal tracking for welfare over broad exposure.

Suggested Workaround for Reporting: Implement an aggregated transfer registry in ASRU annual reports, categorising movements by type (e.g., inter-establishment vs. POLE) and species without specifics. Ensure legal compliance via UK GDPR pseudonym structure, and facilitate FOIA access to non-sensitive summaries (e.g., total transfers processed), using Section 31 (law enforcement) exemptions for security-sensitive data. This introduces indirect transparency through oversight metrics while safeguarding logistics.

3c. Disposal and Fate

This group details the endpoints for animals, including killing (methods and causes), re-homing, setting free, release to the wild, transfer to farms/slaughter, or export. It requires assessments of fitness, rehabilitation, and socialisation, with consents and records (especially for special species) to minimise suffering.

Public Disclosure Status: Partially Reported (aggregated fates in annual statistics if related to procedures).

Reason for Level: Partial aggregation shields sensitive welfare decisions and re-homing details that could involve personal data (e.g., adopter information) or expose establishments to criticism. It allows public monitoring of overall fates (e.g., re-homing rates) to demonstrate ethical practices, aligning with ASPA's focus on outcomes without revealing case-by-case specifics that might deter positive disposals like re-homing.

Suggested Workaround for Reporting: Expand annual statistics to include anonymised case studies on successful re-homing (i.e. to a home or sanctuary or released) not to a slaughter house or re-used, published via gov.uk guidance documents. Adhere to UK GDPR by minimising data (e.g., excluding identifiers) and obtaining consents where applicable, while responding to FOIA with redacted fate breakdowns, balanced by Section 40 (personal information) protections. This enhances public education on welfare endpoints without full disclosure.

3d. Killing Details

This covers methods of killing (restricted to Schedule 1 or authorised techniques), competence requirements (registers listing names, species, and methods), and circumstances (e.g., emergencies at POLEs). Killing must be expeditious, with confirmation of unconsciousness to ensure humane standards.

Public Disclosure Status: Undisclosed.

Reason for Level: Methods and registers involve technical and personal details that could be misused. As internal compliance mechanisms, their disclosure adds little public benefit, with ASPA emphasising verified competence over public listing to maintain focus on welfare assurance.

Suggested Workaround for Reporting: Integrate anonymised competence summaries (e.g., aggregated method usage frequencies and training stats) into AWERB reports, with excerpts included in ASRU transparency publications. Meet UK GDPR standards through de-identification, and use FOIA for access to generalised guidance on methods, applying Section 36 (prejudice to public affairs) if disclosure risks operational integrity. This promotes best practice sharing without revealing personal or site-specific data.

3e. Causes of Death/Mortality

This includes classifying deaths as procedure-related or not, investigations into unexpected deaths, and severity assessments (e.g., classified as severe if involving suffering). Data contributes to annual statistics for monitoring.

Public Disclosure Status: Partially Reported (aggregated mortality in annual statistics severity breakdowns).

Reason for Level: Aggregation prevents revelation of project vulnerabilities or specific incidents that could compromise research or lead to misinformed public backlash. Partial reporting via severity breakdowns informs on welfare impacts and trends, supporting ASPA's goal of systemic transparency while protecting investigative details.

Suggested Workaround for Reporting: Augment annual statistics with categorised mortality trend analyses (e.g., procedure-related vs. natural causes percentages) in dedicated ASRU reports. Ensure UK GDPR compliance by aggregating data anonymously, and handle FOIA requests for deeper breakdowns with redactions, using Section 30 (investigations) to withhold active case details. This provides actionable insights into mortality reduction efforts while maintaining legal protections.

4. Health, Welfare, and Care

Section 4 of the Animals (Scientific Procedures) Act 1986 (ASPA) framework focuses on **Health, Welfare, and Care** — the ongoing, day-to-day standards for protecting animals in licensed establishments. These records and practices ensure compliance with the 3Rs (Replacement, Reduction, Refinement), prevent avoidable suffering, and maintain high welfare during housing, monitoring, and care (aligned with the Code of Practice, including Annex 3 on housing/enrichment and requirements for daily checks, veterinary oversight, and environmental controls).

N.B. Remember the breeding establishments are set up for human management with minimal animal welfare standards.

For each sub-area below, the report details::

- **What it is for** — its purpose in the regulatory system.
- **Reason for the level of reporting/disclosure** — why it's undisclosed or partially reported (based on privacy, security, operational sensitivity, and public value balance under ASPA/UK GDPR/FOIA).
- **Suggested workaround** — practical, incremental steps to increase transparency (aggregation/anonymisation, NTS enhancements per the Animals in Science Committee (ASC) October 2025 report on NTS/RA improvements — clearer lay language, glossaries, structured formats, searchable portals — and ASRU annual reports, e.g., 2024 report published December 2025 with anonymised non-compliance details).

4a. Daily Checks and Environmental Conditions

Details/Examples: Health/behaviour/well-being assessments, temperature/humidity/lighting monitoring; quarantine/acclimatisation periods.

Retention/Reporting Notes: Performed by competent persons; 5-year retention.

What it is for:

Daily checks (at least once per day by a trained person) identify sick, injured, or distressed animals early, enabling prompt intervention to prevent/minimise suffering (ASPA Standard Condition requirement). Environmental monitoring ensures stable, species-appropriate conditions (e.g., per Code of Practice Annex 3), reducing stress and supporting welfare/valid science outcomes.

Reason for Level: Undisclosed.

These are highly operational, site/facility-specific logs. Full disclosure could reveal vulnerabilities (e.g., exact monitoring schedules, room layouts, or routine issues) exploitable for security risks (e.g., sabotage by opponents). Public value is limited compared to aggregated welfare trends; ASPA prioritises internal assurance over granular exposure.

Suggested Workaround: Aggregate anonymised compliance metrics (e.g., "% of daily checks completed on time by species/sector", common environmental parameter deviations/ranges) in ASRU annual reports or a public dashboard (building on 2024 ASRU report's non-compliance trends). Use pseudonym's under UK GDPR; respond to FOIA requests with redacted summaries (exemptions under s.43 commercial interests/s.31 security applied sparingly). Encourage voluntary AWERB-shared anonymised case studies via NC3Rs guidance for best-practice sharing.

4b. Health and Veterinary Records

Details/Examples: Treatments, NVS-supervised advice, monitoring of adverse effects/post-procedure recovery; contingency arrangements for NVS unavailability.

Retention/Reporting Notes: Maintained to professional standards; 5-year retention.

What it is for:

These dossiers track individual/group animal health history, veterinary interventions, and recovery, ensuring continuity of care, early detection of issues, and compliance with welfare standards. They support NVS oversight (Named Veterinary Surgeon role) and enable traceability for audits/non-compliance investigations.

Reason for Level: Undisclosed.

Records contain sensitive animal-equivalent "medical" data (health histories, treatments) that could indirectly identify projects/personnel or expose proprietary care protocols. Disclosure risks privacy/security breaches (UK GDPR considerations for sensitive processing) or commercial harm; broader welfare is captured via NTS/project outcomes.

Suggested Workaround: Publish anonymised national trends (e.g., most frequent treatments, average recovery timelines by severity class/procedure type, common adverse effect rates) in ASRU transparency sections or annual reports. Process as pseudonym aggregates; FOIA access to de-identified systemic insights (no individual records). Align with ASC emphasis on better welfare outcome visibility in NTS/RA.

4c. Adverse Reactions and Interventions

Details/Examples: Morbidity/mortality events, pain/distress/suffering/harm, alleviation measures (analgesics/sedatives), exceeded severity limits.

Retention/Reporting Notes: Prompt notifications to ASRU; humane end-points enforced.

What it is for:

To document and respond to unexpected/unacceptable suffering, trigger interventions (e.g., analgesia, euthanasia), report breaches, and apply lessons for refinement. Supports severity limit enforcement and retrospective harm-benefit evaluation.

Reason for Level: Partially Reported (predicted/actual in NTS; aggregated in ASRU if non-compliance).

Partial disclosure via NTS (project-level predicted/actual harms) and ASRU reports (anonymised non-compliance summaries) balances ethical transparency with protection of incident specifics (which could compromise ongoing research or lead to misinterpretation/backlash). Full case details risk inhibiting open reporting.

Suggested Workaround: Expand NTS harm sections with structured anonymised intervention summaries (e.g., alleviation success rates/categories, common exceedance types). Include aggregated adverse event frequencies/themes in ASRU non-compliance reporting (as in 2024 report). Mandate inclusion in retrospective assessments for high-severity projects (per ASC 2025 recommendations for clearer RA/NTS integration). FOIA for redacted trends.

4d. Husbandry and Enrichment

Details/Examples: Housing/food/water/social needs, minimised restrictions; compliance with Annex 3/Code of Practice; security/fire/disaster measures.

Retention/Reporting Notes: Ongoing compliance; security measures required.

What it is for:

To meet species-specific physiological/ethological needs (e.g., social grouping, foraging opportunities, environmental complexity per Code of Practice Annex 3), reduce stress, and promote natural behaviours — core to refinement and valid science.

Reason for Level: Undisclosed (some elements indirectly in NTS 3Rs sections).

Facility-specific protocols (e.g., exact enrichment items, housing designs) could reveal operational vulnerabilities or proprietary methods. Security/disaster details

pose direct risks if publicised. Public interest served via broader 3Rs/project welfare reporting.

Suggested Workaround: Aggregate enrichment/husbandry adoption rates (e.g., "% social/group housing", common environmental complexity categories without site specifics) in ASRU annual reports or NC3Rs guidance. Promote voluntary anonymised best-practice examples via AWERB networks/NC3Rs. FOIA for redacted policy excerpts (s.36 prejudice to public affairs exemption if needed). Leverage ASC push for stronger 3Rs detail in NTS.

4e. Welfare Minimisation

Details/Examples: Application of 3Rs in care (socialisation, enrichment); physiological/behavioural impact assessments.

Retention/Reporting Notes: AWERB advice integrated.

What it is for:

To embed 3Rs into routine care (beyond procedures), assess/minimise impacts (e.g., stress from housing), and drive continuous refinement via AWERB input — ensuring welfare is prioritised throughout an animal's time in the establishment.

Reason for Level: Partially Reported (in NTS 3Rs sections).

Project-level 3Rs application (including care refinements) is public via NTS, but granular facility-wide impacts remain internal to protect operational details/IP. Partial reporting fosters trust in ethical standards without exposing specifics.

Suggested Workaround: Require NTS appendices with anonymised physiological/behavioural impact metrics (e.g., stress indicator trends, enrichment effectiveness categories). Integrate AWERB advice summaries (redacted) into transparency reports. Align with ASC 2025 recommendations for clearer, more structured 3Rs language in NTS (e.g., lay explanations, examples). Voluntary NC3Rs-hosted case studies for sector-wide refinement sharing.

5. Procedures, Severity and Techniques

Section 5 of the Animals (Scientific Procedures) Act 1986 (ASPA) framework covers **Procedures, Severity, and Techniques** — the core regulated activities performed on protected animals. These elements ensure that procedures are justified, severity is accurately assessed/predicted, suffering is minimised (via anaesthesia, analgesia, humane end-points), and lessons are learned through retrospectives and refinements. This supports the harm-benefit analysis, 3Rs application, and compliance reporting (e.g., annual statistics, NTS).

For each sub-area, the report details

- **What it is for** — its regulatory purpose.
- **Reason for the level of reporting/disclosure** — why partially reported (or undisclosed elements) per ASPA/UK Home Office practice as of February 2026 (balancing transparency with IP protection, security, privacy under UK GDPR/FOIA exemptions like s.43 commercial interests/s.31 law enforcement).
- **Suggested workaround:** Feasible steps leveraging NTS (enhanced per Animals in Science Committee (ASC) report published October 2025, last updated November 2025, recommending clearer lay language, glossaries, structured formats, better 3Rs/harms detail, searchable databases), aggregated annual statistics, ASRU reports (e.g., 2024 report published December 2025 with anonymised non-compliance), and voluntary mechanisms.

5a. Procedure Descriptions

Details/Examples: Types (surgery, substance administration, gene modification, anaesthesia, killing, imaging, toxicity, etc.), methods, supervision, competence (with Personal Licence Holder names).

Retention/Reporting Notes: Contemporaneous records; PIL holder names noted.

What it is for:

To document exactly what regulated procedures are performed, how (methods), by whom (competent/supervised PIL holders), ensuring traceability, welfare compliance, and audit ready. Supports severity classification, supervision requirements, and non-compliance investigations.

Reason for Level: Partially Reported (predicted/actual in NTS).

Full granular descriptions (detailed methods, supervision specifics) remain largely undisclosed to protect intellectual property (proprietary techniques), operational security (preventing misuse or targeting), and individual privacy (PIL holder names). Partial reporting via NTS provides layperson-accessible overviews of planned/actual procedures without revealing sensitive details, aligning with ASPA's public information goal (Section 5A) while safeguarding research integrity.

Suggested Workaround: Enhance NTS with categorical, anonymised summaries (e.g., "common surgical refinements applied" or "substance administration via refined oral gavage methods") in structured sections, avoiding IP-sensitive specifics. Include voluntary post-project anonymised examples in NC3Rs resources or scientific publications. FOIA for redacted overviews (exemptions s.43/s.40 applied); build on ASC 2025 NTS recommendations for clearer procedure descriptions in lay language.

5b. Severity Classifications

Details/Examples: Predicted and actual severity (sub-threshold/mild/moderate/severe/non-recovery); cumulative effects, highest per animal; death classified as severe if procedure-related.

Retention/Reporting Notes: Annual statistical returns; examples (mild: biopsies; moderate: surgery; severe: toxicity leading to death).

What it is for:

To categorise suffering levels for ethical evaluation, licence limits, reporting, and retrospective analysis. Ensures severity is not exceeded, cumulative impacts are monitored, and data informs 3Rs/annual statistics on overall welfare burden.

Reason for Level: Partially Reported (aggregated by purpose/species in annual statistics; per-project in NTS).

Aggregation protects project-specific vulnerability details (e.g., exact cumulative patterns) from misuse or misinterpretation. Per-project NTS disclosure of predicted/actual severity promotes transparency on harms without granular data that could compromise IP or security.

Suggested Workaround: Develop interactive dashboards in annual statistics (building on existing national publications) for drill-down trends (e.g., severity by species/purpose/year). Require NTS to include anonymised cumulative severity tables/examples. Align with ASC 2025 push for standardised, clearer severity reporting in NTS (e.g., structured harms sections, glossaries for categories).

5c. Anaesthesia, Analgesia, NMBAs

Details/Examples: Use/justifications for withholding; monitoring (depth, heart rate/EEG), regimens, emergencies; 72-hour notices for neuromuscular blocking agents (NMBAs).

Retention/Reporting Notes: Appendix H guidance; refinements noted.

What it is for:

To minimise pain/distress during invasive procedures (anaesthesia/analgesia mandatory unless justified), ensure monitoring prevents awareness/suffering, and regulate NMBA (paralytics) with strict safeguards (notices, monitoring) to avoid hidden distress.

Reason for Level: Partially Reported (in NTS refinements sections).

Detailed regimens/justifications are technical/IP-sensitive; full disclosure risks revealing proprietary protocols. Partial NTS coverage focuses on refinement benefits (e.g., "balanced anaesthesia used to reduce suffering") without exposing methods.

Suggested Workaround: Mandate NTS refinement sections with anonymised regimen categories/examples (e.g., "multi-modal analgesia protocols with EEG monitoring"). Aggregate NMBA notice/use stats in ASRU reports. Include in ASC-recommended structured NTS formats for better 3Rs detail; voluntary NC3Rs sharing of anonymised best practices.

5d. Humane End-Points

Details/Examples: Triggers for intervention/euthanasia; amelioration measures.

Retention/Reporting Notes: Avoid death as endpoint where possible.

What it is for:

To define clear, objective criteria ending procedures before unnecessary suffering (e.g., weight loss thresholds, behavioural scores), replacing death as default endpoint and promoting refinement.

Reason for Level: Partially Reported (in NTS harms sections).

Triggers are project-specific; full details could reveal sensitive experimental vulnerabilities. NTS partial disclosure explains expected harms/end-point strategies in lay terms for public understanding.

Suggested Workaround: Require NTS to mandate anonymised trigger/amelioration tables (e.g., "behavioural scoring leading to early euthanasia"). Publish aggregated avoidance-of-death stats in annual reports. Enhance per ASC 2025 NTS guidance for clearer harms/end-point language and examples.

5e. Retrospective Assessments

Details/Examples: Objectives achieved, actual harms, 3Rs lessons; mandatory for primates/cats/dogs/equidae/severe/education/endangered projects.

Retention/Reporting Notes: Updated in non-technical summaries.

What it is for:

Post-project evaluation of outcomes vs. predictions, actual suffering, 3Rs application, and lessons to improve future work — mandatory for high-welfare-concern projects to drive continuous refinement and accountability.

Reason for Level: Partially Reported (in retrospective NTS).

Published alongside/updated in NTS for required projects, but details anonymised/redacted to avoid IP exposure or misinterpretation of scientific outcomes. Partial format promotes reflection/transparency without full raw data.

Suggested Workaround: Implement ASC 2025 recommendations: standardised separate RA sections in NTS (clearer structure, lessons learned focus), searchable gov.uk repository, expanded voluntary coverage. Include anonymised key metrics (e.g., % objectives met, refinement impacts) in ASRU reports.

5f. Outcomes and Refinements

Details/Examples: Morbidity/mortality rates, controls, statistical design to minimise numbers/avoid duplication.

Retention/Reporting Notes: AWERB reviews.

What it is for:

To quantify project impacts (e.g., adverse rates), justify designs (e.g., power calculations reducing animal use), and apply refinements — ensuring efficient, ethical science with AWERB oversight.

Reason for Level: Partially Reported (in NTS retrospective sections).

Granular rates/designs are IP-sensitive (competitive advantage); partial NTS disclosure highlights 3Rs benefits/outcomes without exposing full protocols.

Suggested Workaround: Aggregate morbidity/mortality + statistical efficiency trends in ASRU annual reports. Require NTS retrospective sections with anonymised examples (e.g., "statistical refinements reduced numbers by X%"). NC3Rs-hosted anonymised case library for refinements; align with ASC clearer NTS 3Rs articulation.

6. Training, Competence, and Supervision

Section 6 of the Animals (Scientific Procedures) Act 1986 (ASPA) framework addresses **Training, Competence, and Supervision** — the system for ensuring all personnel (scientists, technicians, animal carers, etc.) are properly educated, skilled, and monitored when handling protected animals. This is a core requirement under ASPA sections 2C, 4, and 5C, with the **Named Training and Competency Officer (NTCO)** holding key responsibility for setting/maintaining standards, records, supervision until competence is proven, and ongoing CPD (as detailed in Home Office guidance on training/CPD under ASPA, updated November 2024, and referenced in the 2024 ASRU Annual Report published December 2025).

For each sub-area below, the report details:

- **What it is for** — its purpose in the regulatory system.
- **Reason for the level of reporting/disclosure** — why undisclosed (based on current ASPA/Home Office practice as of February 2026: privacy under UK GDPR, personal data protections, security risks to individuals, low direct public value vs. internal compliance focus).
- **Suggested workaround** — practical steps using aggregation/anonymisation, ASRU annual reports (e.g., 2024 report notes NTCO roles in competence assurance but no individual details), voluntary mechanisms via NC3Rs/AWERB, and FOIA-targeted releases.

6a. Training Records

Details/Examples: Accredited modules (e.g., PIL A/B/C theory/skills, species-specific), CPD activities, assessments, refreshers (every 5 years max, often more frequent), endorsements (especially for killing/NMBAs).

Retention/Reporting Notes: Maintained by NTCO; specific for killing/NMBAs.

What it is for:

To document that individuals have completed required accredited training (e.g., Modules L/E1 for legislation/ethics/3Rs, species/procedure modules), passed assessments, and undertake CPD/refreshers to maintain knowledge/skills. Ensures ongoing competence, supports licence applications/endorsements (e.g., by NTCO), and enables audits/inspections by ASRU inspectors (who review these as part of compliance checks).

Reason for Level: Undisclosed.

These are personal/professional development records containing individual names, qualifications, assessment outcomes, and CPD logs — treated as sensitive personal data under UK GDPR (special category if health-related, e.g., fitness to work). Public disclosure risks privacy breaches. Public value is indirect (system-wide competence assured via regulatory oversight); ASPA focuses on internal NTCO/establishment assurance rather than naming individuals or listing records.

Suggested Workaround: Publish anonymised national/sector-level metrics in ASRU annual reports (e.g., "% of staff completing CPD refreshers within 5 years", common module uptake rates, refresher compliance trends by establishment type – building on ASRU's 2024 report mention of NTCO/HOLTIF forums for training standards). Encourage voluntary anonymised summaries of training frameworks/best practices via NC3Rs guidance or AWERB networks. For FOIA requests, provide redacted policy-level extracts (e.g., NTCO-maintained processes without names/logs), using Section 40 (personal data) exemptions. This provides oversight on training quality without exposing individuals.

6b. Competence Registers

Details/Examples: Registers for procedures/killing (by species/methods); supervision logs until competence demonstrated.

Retention/Reporting Notes: Reviews required for elderly/retired licensees (aged 70+); NTCO/establishment-held.

What it is for:

To record who is assessed as competent (and by what method/species) to perform regulated procedures or Schedule 1 killing independently. Includes supervision logs during training phases. Ensures no unqualified work occurs (ASPA requirement: supervision until competence proven), supports NTCO assessments, and allows traceability for audits/non-compliance (e.g., if errors occur).

Reason for Level: Undisclosed.

Registers link specific individuals to authorised procedures/species/methods – highly personal/professional data. Disclosure could identify researchers/technicians (privacy/security risks, e.g., targeted activism), reveal operational capabilities, or deter participation. Competence is assured internally via NTCO reviews/inspections; public interest met through broader compliance reporting (e.g., ASRU non-compliance stats) rather than individual registers.

Suggested Workaround: Aggregate anonymised competence coverage statistics in ASRU transparency reports (e.g., "% of procedures covered by competent staff by species/category", supervision log trends, review rates for 70+ licensees – no names/method specifics). Include sector-wide endorsement trends (e.g., common gaps addressed) in NC3Rs/ASRU guidance updates. FOIA for generalised summaries (redacted under s.40 personal data/s.36 prejudice to effective conduct). Voluntary NTCO-shared anonymised examples of competence assessment processes via professional networks (e.g., LASA guiding principles).

6c. Education Needs

Details/Examples: Ongoing education for all staff/assistants (including non-PIL holders like carers); local standards set by establishment/NTCO.

Retention/Reporting Notes: Ongoing process; no fixed retention but tied to CPD/training records.

What it is for:

To identify/address ongoing learning requirements for everyone interacting with animals (e.g., husbandry staff, new assistants), beyond formal accredited modules. Ensures awareness of welfare/3Rs/local standards, supports culture of care, and prevents gaps in knowledge (e.g., updates on best practice, new refinements).

Reason for Level: Undisclosed.

Education needs assessments are local/ongoing and often informal (e.g., gap analyses, NTCO discussions). Disclosure could reveal internal weaknesses or staff-specific gaps (privacy/operational sensitivity). Low public value compared to outcomes (e.g., welfare metrics); focus remains on internal NTCO-driven improvement.

Suggested Workaround: Include sector-wide ongoing education gap themes/trends in ASRU annual reports or AWERB/NC3Rs guidance (e.g., "increased focus on behavioural observation training" or "common needs for updated 3Rs modules" – anonymised aggregates). Promote NTCO/AWERB voluntary sharing of local education frameworks/best practices (redacted examples) via professional forums. FOIA for high-level policy excerpts (e.g., how needs are assessed locally), with s.40 exemptions for personal elements. This enhances visibility of systemic training culture without exposing establishment-specific details.

7. Statistical Returns, Non-Compliance, and General Reporting

Section 7 of the Animals (Scientific Procedures) Act 1986 (ASPA) framework covers **Statistical Returns, Non-Compliance, and General Reporting** — the mechanisms for aggregating, analysing, and publicly sharing data on animal use, breaches, notifications, and project summaries. This promotes systemic transparency, accountability, trend monitoring (e.g., reductions in animal numbers/severity), enforcement of compliance, and public engagement via accessible information (NTS). It aligns with ASPA Sections 5A (public information) and 21 (statistics collection), with data submitted via ASPeL (Animals in Science Procedures e-Licensing system).

For each sub-area below, the report details:

- **What it is for** — its regulatory purpose.
- **Reason for the level of reporting/disclosure** — why partially reported or undisclosed (based on current Home Office/ASRU practice as of February 2026: balance of public interest/transparency vs. privacy/security/commercial sensitivity under UK GDPR/FOIA exemptions like s.40 personal data, s.43 commercial interests, s.31 law enforcement, s.30 investigations).
- **Suggested workaround** — practical, incremental steps using aggregation/anonymisation, existing tools (annual statistics published by November, ASRU annual reports — e.g., 2024 report published December 12, 2025, with accessible version January 6, 2026, including anonymised non-compliance details), ASC recommendations (October 2025 NTS/RA report, updated November 2025, for clearer NTS/RA content, searchable access, structured formats), and FOIA-targeted releases.

7a. Annual Statistical Returns

Details/Examples: Procedures (numbers/species/severity/nature/purpose/outcomes); breeding/re-uses/deaths/NMBAs; publications.

Retention/Reporting Notes: Submitted by Project Licence Holders (PPLh) via ASPeL by January 31; national publication by November 10 (historical pattern; e.g., 2024 data published late 2025).

What it is for:

To collect/compile standardised data on all regulated procedures (and related activities like breeding) for the calendar year, enabling Home Office to publish national aggregated statistics. This tracks trends in animal use (e.g., reductions over time), informs policy/3Rs progress, supports public accountability, and fulfils ASPA statutory duty (Section 21) for annual publication.

Reason for Level: Partially Reported (aggregated national statistics published annually).

Full raw/establishment-level data undisclosed to protect commercial/IP interests (e.g., project volumes revealing research focus), security (preventing targeting), and privacy (avoiding indirect identification via detailed breakdowns). Aggregation (by species/purpose/severity/etc.) provides meaningful public oversight of overall burden/trends without exposing sensitive specifics, aligning with ASPA's transparency-without-harm approach.

Suggested Workaround: Enhance existing national statistics with interactive/visual dashboards on gov.uk (e.g., drill-down trends by species × severity × purpose × year, sector breakdowns) – building on current publications and user guide updates. Include more contextual commentary (e.g., links to 3Rs impacts) per ASC guidance. FOIA for redacted sector-specific aggregates; voluntary establishment-level summaries (anonymised) via NC3Rs/ASRU for high-impact trends.

7b. Non-Compliance Incidents

Details/Examples: Breaches (welfare/licence conditions), investigations, rectifications.

Retention/Reporting Notes: Prompt self-reports by establishments; anonymised summaries.

What it is for:

To ensure prompt reporting/investigation of breaches (e.g., welfare failures, unauthorised procedures), apply proportionate sanctions (warnings to prosecution), track rectifications, and prevent recurrence. Supports enforcement, learning (root causes), and public confidence in regulatory rigour.

Reason for Level: Partially Reported (aggregated/anonymised in ASRU annual report).

Full case details undisclosed to protect ongoing investigations (FOIA s.30 exemption), privacy (personal/establishment identifiers), security (preventing exploitation of vulnerabilities), and fair process. Anonymised/aggregated summaries (e.g., number of cases, animals affected, themes) in ASRU reports (as in 2024 report: 146 cases across 45 establishments, 22,204 animals involved, mostly self-reported) provide transparency on enforcement without compromising specifics.

Suggested Workaround: Expand ASRU annual reports with themed/root-cause analyses + rectification success rates (e.g., "common failures: inadequate care – 63 cases; lessons: enhanced monitoring"), as partially done in 2024 report. Publish anonymised case studies (non-identifiable) on lessons learned. FOIA for redacted investigation summaries (s.30/s.31 exemptions); voluntary self-publishing of anonymised breach overviews by establishments via AWERB networks.

7c. Notifications

Details/Examples: Changes (premises/animals/personnel), adverse effects, holder death.

Retention/Reporting Notes: Strict timelines (e.g., 24 hours for personnel changes, 7 days for deaths).

What it is for:

To ensure ASRU is promptly informed of material changes/events (e.g., new named persons, unexpected adverse effects, licence holder death) for oversight, risk assessment, licence updates, and welfare enforcement. Prevents unregulated gaps and enables rapid intervention.

Reason for Level: Undisclosed.

Notifications often involve time-sensitive/personal/operational details (e.g., specific personnel changes, adverse event triggers) that could reveal vulnerabilities, ongoing issues, or individuals (privacy/security risks). Low standalone public value (focus on outcomes/compliance trends); internal processing suffices for regulatory action.

Suggested Workaround: Aggregate notification volumes/compliance timelines in ASRU annual reports (e.g., "% met within 24/7-day deadlines by category", trends in adverse effect reports). Include anonymised themes (e.g., "common personnel notifications: role changes") without specifics. FOIA for high-level summaries (redacted under s.40/s.31); voluntary inclusion in AWERB annual reviews for sector learning.

7d. Non-Technical Summaries

Details/Examples: Project overviews, harms/benefits, 3Rs application.

Retention/Reporting Notes: Publicly available on gov.uk; updated post-retrospective assessment.

What it is for:

To provide accessible, lay-friendly information on licensed projects (objectives, expected/actual harms, benefits, 3Rs measures) for public transparency and accountability (ASPA Section 5A). Enables understanding of ethical justifications and welfare considerations without technical jargon.

Reason for Level: Partially Reported (published per project, anonymised).

Published per approved project (anonymised to protect establishment/researcher identity/IP), but content often criticised for vagueness/technicality (per ASC October 2025 report, updated November 2025). Partial to balance openness with protection of proprietary science and security.

Suggested Workaround: Fully implement ASC 2025 NTS/RA recommendations: mandate standardised templates with clearer lay language, glossaries, structured sections (harms/benefits/3Rs tables), separate retrospective updates, and searchable gov.uk database. Expand voluntary high-quality examples via NC3Rs/ASRU guidance; include anonymised outcome metrics in updates. FOIA for redacted project clusters; encourage establishment self-publishing of NTS (anonymised) for greater accessibility.

Answering specific push-back points:

1. Countering Privacy and Security Concerns

The report acknowledges that details like license holder names or premises layouts are currently **Undisclosed** to protect individuals from harassment or facilities from sabotage. However, it argues this does not justify a total lack of transparency:

Anonymisation & Redaction: The report points out that **Section 24 of ASPA** and **UK GDPR** only protect personal and commercially confidential data; they do not prohibit the release of **anonymised or redacted** welfare and procedural data.

Workarounds: The report suggests using "Establishment A/B" designations and high-level schematic templates for premises that omit sensitive addresses or security-sensitive details.

2. Addressing Intellectual Property (IP) Risks

The establishment often claims that full disclosure would reveal proprietary research methods. The report addresses this by:

Enhancing Existing Mechanisms: Since the Home Office already publishes **Non-Technical Summaries (NTS)**, the principle of public disclosure is already established.

Phased Disclosure: the report suggests "post-project open-access repositories" where full details are shared **after** patent protections are secured, balancing innovation with accountability.

3. Solving the "Section 24" Legal Barrier

The report explicitly states that the establishment's reliance on Section 24 as a "blanket" protection is a choice, not a legal necessity.

Precedent: It is noted that countries like **Switzerland, Belgium, and New Zealand** have successfully implemented these transparency measures without legal challenge.

Administrative Will: The report argues that increasing detail requires only "policy decisions by the Home Office and willingness from licence holders," not new legislation.

4. Improving "Low Public Value" Data

To counter the argument that granular data is too technical for the public, the report proposes:

Clearer Communication: Implementing the **October 2025 ASC recommendations** for NTS, which include better lay language, glossaries, and searchable databases.

Aggregated Metrics: Instead of raw logs, the report suggests publishing **aggregated metrics**—such as total procedures by category or average duration of procedures—which provide high public value without revealing sensitive case-by-case data.

5. The "Resource and Burdens" Argument

The most common excuse for government inaction is "administrative burden."

The Gap: The Home Office may claim that redacting thousands of licenses to prevent "jigsaw identification" (where multiple small pieces of data are combined to identify a person) is too expensive.

The Fix: Argue for **automation**. Suggest that the Home Office's ASPeL (Animals in Science Pro forma Licensing) system should be updated so that "Public Versions" of documents are generated automatically at the point of entry by the researcher, shifting the "burden" away from the regulator.

6. The "Jigsaw Identification" Risk

The establishment is terrified of "jigsaw identification"—the idea that even if a name is removed providing the species, the severity, and the specific month of a procedure could allow someone to figure out which lab it was.

The Gap: The report suggests using "Establishment A/B" designations. The establishment will counter that in certain niche fields (e.g., specific primate research), there may only be one or two labs in the UK, making "anonymisation" impossible.

The Fix: Propose a "**Delayed Disclosure**" model for sensitive sectors. If data is released 2–3 years after the project ends, the immediate security risk to staff is mitigated, but the transparency is preserved for the public record. Not perfect for those concerned about animal welfare but at least a public record is put into place.

7. Verification of "Retrospective Assessments"

The report mentions improving Non-Technical Summaries (NTS) with retrospective updates.

The Gap: Currently, many researchers under-report the actual suffering (severity) in these summaries because there is little penalty for doing so.

The Fix: Strengthen this section by calling for a **Mandatory Audit** of a random 5% of Retrospective Assessments. If the "Actual Severity" reported in the NTS doesn't match the internal "Severity Records", there should be a formal non-compliance penalty.

8. Comparison with Global "Gold Standards"

The UK claims to be world leading in its 'protection of animal welfare so it needs to match those words with clearly substantiated evidence. Particularly for animals in science.

The Gap: The establishment often claims the UK is already the "world leader."

The Fix: Explicitly contrast the UK system with the **Swiss "Animal Experimentation" database**, which allows the public to search by the degree of severity and the purpose of the study with much greater ease. Showing that a peer nation hasn't suffered security breaches from doing this would neutralise the "security risk" argument.

9. Defining "Commercial Confidentiality"

This is the "black hole" where most data disappears.

The Gap: The key legal test for "confidential" here is subjective and objective: the information must be something the discloser (e.g., a Home Office official or inspector) knows or reasonably believes was provided in confidence. This definition is "stricter" than a general lay understanding because it hinges on the discloser's knowledge or reasonable belief, making it a criminal threshold rather than a vague notion of sensitivity. It does not protect all information under ASPA—only that which meets this confidence test. As noted in the report, Section 24 does not prohibit anonymised, aggregated, or redacted disclosures (e.g., welfare statistics without identifiers), aligning with the Act's focus on truly confidential elements.

The Fix: Propose that "welfare data" (how the animal lived and died) can **never** be classified as commercially confidential. Distinguish between the *science* (which can be protected) and the *animal's experience* (which should be public).

The Push Back on implementing this report

The establishment—is likely to push back against full transparency by citing several specific legal, security, and operational concerns.

These are the likely reasons for this push back:

1. Privacy and Personal Security

The most immediate push back will likely focus on the protection of individuals and institutions.

Targeted Harassment: The establishment often argues that disclosing specific details about license holders or "Named Persons" (such as Veterinary Surgeons or Care Officers) could expose them to harassment, external pressure, or security risks from activists.

GDPR Compliance: There may be claims that detailed reporting on animal histories or personal license work logs constitutes "personal data equivalents" that are protected under the UK General Data Protection Regulation (UK GDPR).

2. Intellectual Property and Commercial Interests

Research institutions and commercial laboratories are likely to resist transparency to protect their competitive edge.

Proprietary Research: The establishment frequently argues that full disclosure of project protocols and "programmes of work" would reveal proprietary research methods or intellectual property (IP).

Innovation Risks: There is a concern that if research designs are made public too early, it could stifle scientific innovation or harm the commercial competitiveness of the UK life sciences sector.

3. Physical Security of Facilities

Requests for more detail on where animals are kept are likely to be met with safety-based refusals.

Facility Vulnerabilities: Disclosing premises layouts, room schedules, or specific animal locations (including "Places Other Than Licensed Establishments" or POLEs) is seen as a significant security risk. The establishment argues this could enable break-ins, theft, or sabotage.

Logistical Security: Similarly, sharing detailed information on the movement and transfer of animals is often restricted to prevent interference with transport routes.

4. Legal Barriers (Section 24 of ASPA)

The establishment often relies on Section 24 of the Animals (Scientific Procedures) Act 1986 as a "blanket" protection.

Confidentiality Requirements: This section prohibits the disclosure of information given in confidence. The report notes that the establishment currently uses this to keep internal records undisclosed, even when the data could be anonymised.

Self-Policing Culture: The report suggests there is a "cultural" barrier where the current system prefers an effectively self-policing model over meaningful public or parliamentary oversight.

5. Potential for Public Misinterpretation

A common administrative push back is that granular data is too complex for the lay public.

Low "Public Value": The establishment may argue that highly technical logs—such as daily environmental checks or specific identification methods—add minimal value to the public's understanding of welfare and instead risk being misinterpreted.

Maintaining Trust: There is often a preference for "aggregated" national statistics, with the argument that this provides a sufficient overview of trends without the risks associated with case-by-case disclosure.

Response:-

The report directly anticipates and provides solutions for the very issues the establishment is likely to raise. A central theme of the document is that the barriers to transparency are "political and cultural" rather than legal, as the framework for disclosure already exists within current laws.

Establishment Checklist

This checklist is designed for establishments to improve transparency and regulatory alignment, based on the suggested "Workarounds" and "Reason for level" notes from the provided data.

1. Administrative & Personnel Transparency

- Anonymised Licensing Summaries:** Prepare aggregated statistics on the number of license holders and suitability assessments for potential inclusion in annual reports.
- Voluntary Role Registries:** Consider implementing a system where named persons can opt-in to disclose anonymised professional profiles (qualifications/roles) without personal identifiers.
- Redacted License Conditions:** Develop a process for creating redacted versions of license conditions and amendments, removing all sensitive personal or corporate identifiers.
- Premises Schematics:** Create high-level, standardised schematic templates of facility areas that omit security-sensitive details like specific addresses or entry points.

2. Animal Management & Breeding

- Quarterly Data Summaries:** Establish a standardised template for releasing aggregated data on animal numbers and demographics on a quarterly basis.
- Origin Certification:** Implement a voluntary certification scheme for suppliers to list anonymised origin categories (e.g., "UK captive-bred").
- Timeline Auditing:** Use internal systems to generate anonymised metrics on average procedure durations by species to identify efficiency trends.
- Welfare Outcome Abstracts:** Create anonymised abstracts of health histories and social histories for cats, dogs, and primates for potential post-project sharing.
- Breeding Strategy Case Studies:** Document successful surplus minimisation strategies as anonymised case studies for sector-wide learning.

3. Operational Procedures & 3Rs

- NTS Enhanced Appendices:** Prepare anonymised appendices for Non-Technical Summaries (NTS) that include aggregated protocol data and statistical overviews.
- Re-use Metrics:** Track and aggregate re-use consent rates and cumulative effect categories for structured reporting.

[] **Enrichment Adoption Rates:** Maintain records of social/group housing percentages and environmental complexity categories for transparency reporting.

[] **Severity Dashboards:** Develop internal dashboards to track severity trends by species and purpose to facilitate easier drill-down reporting.

[] **Refinement Regimen Categories:** Categorise anaesthesia and analgesia regimens into broad types (e.g., "multi-modal") to explain refinements without revealing proprietary protocols.

4. Training, Compliance, & Reporting

[] **Competence Coverage Stats:** Aggregate data on the percentage of procedures covered by competent staff and supervision log trends.

[] **Education Gap Themes:** Identify and document common themes in staff education needs (e.g., "increased focus on behavioural observation").

[] **Root-Cause Analysis for Breaches:** Conduct themed analyses of any non-compliance incidents to identify lessons learned and rectification success rates.

[] **NTS Lay Language Audit:** Review Non-Technical Summaries against ASC 2025 recommendations to ensure they use clear lay language and standardised glossaries.

Conclusion

The report argues that because the UK already collects the **"most detailed, granular oversight system... anywhere in the world,"** the data is already there.

The "workarounds" provided are designed to release this information in a way that is **immediately deployable and lawful**.

The report moves beyond emotional or ethical arguments and focuses on the **technical and administrative "plumbing"** of the UK's regulatory system.

By identifying the specific 38 areas of reporting, the report has created a checklist that is difficult for the Home Office to dismiss as "uninformed."

By emphasising that the current digital infrastructure (ASPeL) already handles this data, it can be argued that transparency is simply a matter of **togglng a "Public View" switch** that is currently turned off.

By specifically addressing the **38 reportable areas**, the report shows that the necessary data is already being collected; the only thing missing is the "political and cultural" will to release it.

The report's strongest "seal" is the argument that **without reporting on all 38 areas, the system remains effectively self-policing**.

By showing that partial disclosure currently "obscures trends and hides poor practice," the report frames transparency not as an optional luxury, but as a mandatory requirement for genuine parliamentary oversight.

It Neutralises the "Section 24" Defence: The report clarifies that Section 24 of ASPA only protects specific personal or commercially sensitive identifiers. By proposing **anonymised and aggregated data** (e.g., "Establishment A" instead of a named university), you demonstrate that welfare and procedural data can be released without breaking the law.

It Uses Existing Infrastructure: The report points out that the Home Office already uses disclosure mechanisms for **Non-Technical Summaries (NTS)** and national statistics. This proves that the legal pathway for transparency is already "routinely used" and simply needs to be expanded to the other 38 areas.

It Leverages International Precedent: By citing countries like **Switzerland, Belgium, and New Zealand**, the report provides empirical proof that these transparency measures have been "successfully implemented... without legal challenge," making it difficult for the UK to claim it is impossible. It suggests that the administrative costs are manageable for modern regulatory bodies.

It Solves the Privacy vs. Public Value Conflict: For highly sensitive areas like **Named Persons' Details** or **Establishment Premises**, the report proposes "standardised, high-level schematic templates" and "voluntary public registries". This allows for accountability (confirming a facility is fit for purpose) without revealing

site-specific vulnerabilities.

It Protects Intellectual Property (IP): To answer the "commercial confidentiality" pushback, the report suggests **post-project open-access repositories**. This allows researchers to protect their patents while ensuring the public eventually sees the full "programme of work".

The report frames the implementation not as a new expense, but as a **repurposing of existing data**, because establishments are already mandated to record these 38 areas—such as daily health checks, veterinary records, and breeding strategies—there is no new data collection cost.

By automating redaction and using standardised templates for reporting, the "cost" is reduced to the initial setup of these digital tools rather than a recurring per-licence fee.

That is a small cost that any Government who is supporting any strategy to phase out , be transparent and honest with the public could easily find support to deliver.

Utilises Existing Digital Infrastructure. The workarounds leverage existing regulatory frameworks like ASPeL (the e-licensing system) and the Non-Technical Summary (NTS) portal. For example, the report suggests developing an "anonymised timeline audit tool" within the existing e-licensing system to generate metrics automatically.

Shift from Manual to Policy-Based Disclosure. The report states that these measures "require no new legislation, only policy decisions by the Home Office". Implementation costs would primarily involve administrative adjustments to how the Home Office/ASRU aggregates and publishes data that is already in their possession.

Voluntary and Scalable Models Some workarounds, such as voluntary public registries for named persons or self-publishing by establishments, allow for a scalable approach where costs are absorbed into existing institutional communication budgets.

Sources for the Report: Comprehensive List of Reportable Areas under the Animals (Scientific Procedures) Act 1986 (ASPA) and Amendments

The following is a compiled list of key sources referenced or relevant to the content of the report. These include primary legal texts, regulatory reports, guidance on transparency and reporting, and international examples of enhanced disclosure practices in animal research. Sources are categorised for clarity, with links to full texts where available. This list draws from official government publications, EU legislation, and transparency initiatives to support the report's analysis of ASPA compliance, public disclosure limitations, and proposed workarounds. These sources provide the evidentiary basis for the report's discussions on undisclosed areas, partial reporting mechanisms and lawful pathways to enhanced transparency through anonymisation and policy changes.

1. <https://www.legislation.gov.uk/ukpga/1986/14/contents>
2. <https://www.gov.uk/government/publications/consolidated-version-of-aspa-1986>
3. <https://eur-lex.europa.eu/eli/dir/2010/63/oj/eng>
4. <https://norecopa.no/legislation/eu-directive-201063>
5. <https://www.gov.uk/government/publications/animals-in-science-regulation-unit-annual-report-2024>
6. https://assets.publishing.service.gov.uk/media/69383d70e447374889cd8f8c/35.159_HO_Scientific_Procedures_ARA_2024.pdf
7. <https://www.gov.uk/government/collections/non-technical-summaries-and-retrospective-assessments>
8. https://environment.ec.europa.eu/topics/chemicals/animals-science/statistics-and-non-technical-project-summaries_en
9. <https://www.swissuniversities.ch/en/organisation/bodies/chamber-of-universities/bodies/swiss-transparency-agreement-on-animal-research-staar/staar-2024-annual-report>
10. <https://www.bclas.org/wp-content/uploads/2023/06/Transparency-Agreement-English.pdf>
11. <https://ilvo.vlaanderen.be/en/transparency-regarding-animal-trials>