

Table 1

Act	Area	Details/Examples	Retention/ Reporting Notes	Public Disclosure Status	Reason for level	Workaround
1. Licence and Administrative Details	Licence holder information	Names, qualifications, changes (e.g., death, name alterations for individuals/corporations); suitability assessments.	Notify ASRU within 7 days (28-day extension possible); 5-year retention.	Undisclosed	This information often involves personal or corporate identifiers, which could raise privacy concerns or security risks (e.g., targeted harassment of researchers). 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.	To enable public reporting, implement anonymized 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 pseudonymized data releases via Freedom of Information (FOI) requests, balancing transparency with privacy protections.
	Named persons' details	Roles (NPRC, NACWO, NVS, NTCO, NIO), qualifications, conflicts of interest, reviews, changes.	Prompt notification; annual reviews; declarations for NVS/NACWO.	Undisclosed	These details are highly personal, involving professional qualifications and potential conflicts that could expose individuals to privacy breaches or external pressures (e.g., from animal rights activists). 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.	Introduce voluntary public registries where named persons can opt-in to disclose anonymized profiles (e.g., qualifications and roles without personal identifiers) through a centralized 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.

Licence conditions and amendments	Full text, endorsements (e.g., NTCO for PIL categories), suspensions/revocations, representations under Section 12.	Kept available; notify changes; report breaches	Partially Reported (aggregated in ASRU annual report on licensing activities)	These details are highly personal, involving professional qualifications and potential conflicts that could expose individuals to privacy breaches or external pressures (e.g., from animal rights activists). 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.	Expand the partial reporting by mandating the publication of redacted full texts of conditions and amendments (removing sensitive identifiers) in a public ASRU database, categorized 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.
Establishment premises	Schedule of areas (care, procedures, killing), classes, protected animal types; modifications.	Amendments require consent; security/escape prevention measures.	Undisclosed	Details about premises layouts, security protocols, and animal types could pose significant risks if publicized, such as enabling break-ins, theft, or sabotage by opponents of animal research. 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.	Develop standardized, 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.

Project programme of work	Objectives, protocols, animal descriptions/ numbers/species/ stages/genetic status, places (including POLEs), harm-benefit analyses, 3Rs application, predicted severity, anaesthesia/ analgesia, humane end-points, statistical design.	AWERB-reviewed; amendments notified; retrospective assessments for certain projects (e.g., severe, primates).	Partially Reported (in NTS per project: objectives, predicted/ actual harms/ benefits, 3Rs)	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.	Enhance NTS by requiring supplementary anonymized 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.
Personal licence work logs	Procedures performed, animals used, supervision provided/received.	Competence registers; reviews for those aged 70+ or retired.	Undisclosed	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.	Aggregate log data into anonymized 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 summarized, de-identified extracts to increase visibility without personal risks.
AWERB operations	Membership, decisions, reviews (e.g., projects, 3Rs advice, surplus minimization policies), conflicts, training.	Minutes and advice recorded; could inform transparency reports.	Undisclosed	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 that could be misused.	Aggregate log data into anonymized 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 summarized, de-identified extracts to increase visibility without personal risks.

	Fees and billing	Periods covered, payments.	Report failures as non-compliance.	Undisclosed	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.	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	Numbers and demographics	Bred, acquired, supplied, used, re-used, discharged, died/killed; species, sex, age, genetic status, stages (e.g., fetal/embryonic)	Batch for immature forms; annual statistics.	Partially Reported (aggregated in annual statistics by species, genetic status)	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.	Utilize the existing framework under the Freedom of Information Act 2000 (FOIA) by establishing a standardized template for aggregated data releases beyond annual statistics, such as quarterly summaries via the ASRU website. This could include anonymized breakdowns by research sector (e.g., academia vs. industry) without identifying establishments. To meet legal requirements, ensure all data is pseudonymized 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).

	Origins and sources	Bred for procedures, suppliers (names/ addresses), wild-caught/feral exemptions (justifications, capture methods).	Primate origins (captive-bred priority); Schedule 2 compliance.	Partially Reported (aggregated place of birth by species in annual statistics; primate specifics)	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.	Implement a voluntary certification scheme under ASPA guidance, where suppliers can opt into a public registry listing anonymized 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 obtaining explicit consent 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.
	Dates and timelines	Acquisition, supply, procedure start/end, discharge/death.	Contemporaneous; 5 years from disposal.	Undisclosed	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.	Develop an anonymized 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 pseudonymized 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.

	Individual history files	For cats, dogs, primates: ID (microchip/tattoo), birth date/place, breeding/reproductive/veterinary/social history, procedures/projects involved.	Full exchange for inter-licence transfers; copies otherwise; 3 years post-death/transfer.	Undisclosed	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.	Create a centralized, secure database under ASRU for anonymized 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 minimization (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.
	Identification and marking	Methods (least painful), justifications for non-marking; cage labels (project/protocol, start date, PILh name, animal count).	Permanent for specials; mother-linked for unweaned.	Undisclosed	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 emphasizing practical welfare over public scrutiny of identification specifics.	Incorporate standardized 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 anonymizing 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.

	Breeding strategies	Surplus minimization, wastage reviews; captive-bred primates increase; genetic alterations (phenotypes: mild/moderate/severe).	AWERB policies; annual returns include creations.	Partially Reported (aggregated genetic status and breeding purposes in annual statistics)	Aggregation protects proprietary breeding techniques and genetic IP, which are crucial for research innovation, while still allowing public monitoring of trends like genetic alteration rates. Full details could compromise competitive advantages or invite ethical debates on specific programs, but partial reporting demonstrates commitment to minimization without undue exposure.	Expand annual statistics with voluntary case studies in ASRU reports, anonymizing 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.
	Prohibitions and exemptions	No strays/great apes/cosmetics/weapons; justifications for non-purpose-bred/endangered.	Report breaches.	Partially Reported (aggregated in ASRU non-compliance reports if breaches occur)	Reporting only on breaches maintains focus on enforcement outcomes without preemptively 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.	Mandate anonymized exemption summaries in annual non-compliance reports, categorizing by type (e.g., "endangered species justifications approved: X cases"). Legally, adhere to UK GDPR by anonymizing 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	Use in procedures	Numbers/species per protocol, re-use (veterinary consent, health restoration, cumulative effects; limits: one severe max).	Annual returns; retrospective harm assessments.	Partially Reported (aggregated procedures by species/purpose in annual statistics; predicted/actual in NTS)	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.	Leverage the existing NTS framework by requiring enhanced, anonymized appendices in project licenses that summarize re-use metrics (e.g., aggregated consent rates and cumulative effect categories) for publication on the ASRU website. Comply with UK GDPR through data anonymization 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.
	Transfers and movements	Between establishments/ POLEs; consent, history files exchanged.	Under project licence; transport conditions.	Undisclosed	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 prioritizing internal tracking for welfare over broad exposure.	Implement an aggregated transfer registry in ASRU annual reports, categorizing movements by type (e.g., inter-establishment vs. POLE) and species without specifics. Ensure legal compliance via UK GDPR pseudonymization, 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.

	Disposal and fate	Killed (methods, causes), re-homed/set free/released to wild/transferred to farm/slaughter/export; fitness/rehab/socialization.	Consent required; records for specials; minimize suffering.	Partially Reported (aggregated fates in annual statistics if related to procedures)	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.	Expand annual statistics with voluntary, anonymized case studies on successful re-homings or releases, published via gov.uk guidance documents. Adhere to UK GDPR by minimizing 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.
	Killing details	Schedule 1/ authorised methods, competence (registers: names/species/methods), circumstances (e.g., POLE emergencies).	Expeditious; unconscious confirmation.	Undisclosed	Methods and registers involve technical and personal details that could be misused (e.g., to challenge specific practices) or expose individuals to harassment. As internal compliance mechanisms, their disclosure adds little public benefit, with ASPA emphasizing verified competence over public listing to maintain focus on welfare assurance.	Integrate anonymized 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 generalized 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.
	Causes of death/mortality	Procedure-related or not; unexpected deaths (investigations).	Classified as severe if suffering; annual statistics.	Partially Reported (aggregated mortality in annual statistics severity breakdowns)	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.	Augment annual statistics with categorized 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	Daily checks and environmental conditions	Health/behavior/ well-being, temperature/humidity/lighting; quarantine/acclimatization.	By competent person; 5-year retention.	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.	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 pseudonymisation 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.
	Health and veterinary records	Treatments, advice (NVS-supervised), monitoring (adverse effects, post-procedure recovery); arrangements when unavailable.	Professional standards; 5 years.	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.	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 pseudonymised aggregates; FOIA access to de-identified systemic insights (no individual records). Align with ASC emphasis on better welfare outcome visibility in NTS/RA.
	Adverse reactions and interventions	Morbidity/mortality, pain/distress/suffering/harm (alleviation: analgesics/sedatives), exceeded severity/limits.	Prompt notifications; humane endpoints met.	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.	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.

	Husbandry and enrichment	Housing/food/water/social needs, restrictions minimized; compliance with Annex 3/Code of Practice.	Security/fire/disaster measures.	Undisclosed	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.	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.
	Welfare minimization	3Rs in care (socialization, enrichment); physiological/behavioral impacts.	AWERB advice	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.	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	Procedure descriptions	Types (surgery, substance admin, gene mod, anaesthesia, killing, imaging, toxicity, etc.), methods, supervision, competence.	Contemporaneous; PILh names.	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.	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.
	Severity classifications	Predicted and actual (sub-threshold/mild/moderate/severe/non-recovery); cumulative, highest per animal; death as severe if related.	Annual returns; examples: mild (biopsies), moderate (surgery), severe (toxicity leading to death).	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.	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).
	Anaesthesia, analgesia, NMBAs	Use/justifications for withholding; monitoring (depth, heart rate/EEG), regimens, emergencies; 72-hour notices for NMBAs.	Appendix H; refinements.	Partially Reported (in NTS refinements)	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.	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.

	Humane end-points	Triggers for intervention/ euthanasia; amelioration measures.	Avoid death as endpoint where possible.	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.	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.
	Retrospective assessments	Objectives achieved, harms, 3Rs lessons; for primates/cats/dogs/equidae/severe/education/endangered.	Updated non-technical summaries.	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.	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.
	Outcomes and refinements	Morbidity/mortality rates, controls, statistical design to minimize numbers/avoid duplication.	AWERB reviews.	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.	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	Training records	Accredited modules, CPD, assessments, refreshers (every 5 years), endorsements.	NTCO-maintained; for killing/NMBAs.	Undisclosed	<p>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, potential harassment of staff (common in animal research contexts), or security issues (identifying key personnel). 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.</p>	<p>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.</p>
	Competence registers	For procedures/killing (species/methods); supervision logs.	Reviews for elderly/retired.	Undisclosed	<p>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.</p>	<p>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).</p>

	Education needs	For all staff/assistants; local standards.	Ongoing.	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.	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	Annual statistical returns	Procedures: numbers/species/severity/nature/purpose/outcomes; breeding/re-uses/deaths/NMBAs; publications.	By PPLh via ASPeL (31 Jan); national publication by Nov 10.	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.	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.

	Non-compliance incidents	Breaches (welfare/licence), investigations, rectifications.	Prompt self-reports; anonymized summaries.	Partially Reported (aggregated/anonymized 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.	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.
	Notifications	Changes (premises/animals/personnel), adverse effects, holder death.	Timelines: 24 hours (personnel), 7 days (deaths).	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.	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.
	Non-technical summaries	Project overviews, harms/benefits, 3Rs.	Publicly available; updated post-retrospective.	Partially Reported (published per project, anonymized)	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.	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.

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