Implementation Brief

The Transparency Gap

The report "The Transparency Gap" (published February 23, 2026, by Linda Birr-Pixton via the Alliance for Cruelty Free Science proposes practical workarounds for greater public access to data from the UK's 38 specific reportable areas under the Animals (Scientific Procedures) Act 1986 (ASPA). These areas are the detailed records labs must keep to support the 3Rs (Replacement, Reduction, Refinement).

The 38 areas they fall into the seven main categories:

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

The report's core idea: For each of the 38 areas (or grouped sub-areas within these categories), propose anonymised, aggregated summaries or enhancements to existing public tools (like Non-Technical Summaries/NTS, Retrospective Assessments/RAs, annual national stats) — without new laws, just administrative/political will. This avoids breaching Section 24 (confidentiality protections) or GDPR by using smart anonymisation (remove identifiers like names, codes, proprietary details; aggregate to prevent reverse-identification; group by category like "toxicology" or "basic research").

Implementation is similar across areas:
- **Leverage existing systems** — Expand NTS/RAs (already public per project, in plain language), add voluntary "transparency reports" from labs/institutions, or have Home Office/ASPEI e-licensing portals output anonymised summaries.
- **Anonymisation techniques** — Strip names, project codes, specific methods; aggregate (e.g., % or counts by lab type/project category); focus on trends/factual numbers.
- **Start voluntary**— Publish on websites; Home Office pilots breakdowns in national stats.
- **Benefits**— Verify 3Rs application, expose hidden issues, build trust, encourage gentle competition for better welfare, accelerate alternatives adoption.

These techniques are proven in UK government stats, research data sharing (UK Data Service), and health/research contexts — fully compatible with ASPA's confidentiality while closing the transparency gap.

This brief provides:
• a structured breakdown of the implementation details for all the 38 areas collectively
• unified implementation framework for data transparency
• practical examples of anonymisation techniques
• compliance with Section 24 of the ASPA and current GDPR rules and regulations

Below is a structured breakdown of proposed implementation details for each of the 7 categories (covering the 38 areas collectively).
Each includes: Current Issue → Proposed Fix → Implementation Details → Benefits.

Category 1: Licence and Administrative Details
(e.g., licence holders, key staff roles like NACWOs/NTCOs/NIOs/PILs)
- **Current Issue**: Licence holder names, establishment details, and key personnel roles are partially redacted or not public beyond basic listings.
- **Proposed Fix**: Publish anonymised summaries per establishment type (e.g., university vs. commercial) — number of active licences, key roles filled (without names).
- **Implementation Details**: Use ASPEl portal to generate aggregated outputs; remove all personal/identifying info; group by sector (e.g., "academic labs had average 5 Named Persons"). Voluntary institutional reports or Home Office additions to annual stats. No identifiers kept.
- **Benefits:** Shows oversight structure without exposing individuals; helps spot under-resourced facilities.

Category 2: Animal Breeding, Acquisition, Supply, Identification, and Genetics
(e.g., origins, surplus breeding, genetics, identification methods)
- **Current Issue**: Breeding numbers, surplus stats, genetic modifications, and supply sources are internal; public sees only high-level national totals.
- **Proposed Fix**: Anonymised summaries — % surplus animals bred vs. used, % genetically altered, acquisition sources by category (in-house vs. external).
- **Implementation Details** Aggregate to project category (e.g., "toxicology projects: 15% surplus bred"); anonymise via grouping; expand NTS to include retrospective breeding outcomes; voluntary lab reports.
- **Benefits**: Highlights unnecessary breeding/overproduction; pushes Reduction via better planning.

Category 3: Animal Use, Re-use, Transfers, and Disposal
(e.g., actual procedures, re-use limits, transfers, final outcomes like rehoming/euthanasia)
- **Current Issue**: Rehoming rates, re-use, final fates are rarely public beyond aggregates; often hidden for commercial reasons.
- **Proposed Fix:** Per-establishment anonymised figures — % animals rehomed vs. euthanised, re-use instances, transfers.
- I**mplementation Details**: Pull from existing records; aggregate (e.g., "Establishment type X: 8% rehomed"); add to enhanced NTS or national breakdowns; smart redaction of case details.
- **Benefits**: Exposes low rehoming success; encourages better outcomes and Refinement.

Category 4: Health, Welfare, and Care
(e.g., daily monitoring, veterinary records, adverse events)
- **Current Issue**: Daily welfare logs, vet interventions, incidents are fully internal.
- **Proposed Fix**: Anonymised trends — counts/% of welfare incidents, adverse events per severity, monitoring frequency.
- **Implementation Details:** Aggregate to avoid case identification (e.g., "3 welfare breaches reported"); include in voluntary transparency reports or RA expansions; group by project type.
- **Benefits**: Spots systemic welfare problems; verifies daily care standards.

Category 5: Procedures, Severity, and Techniques
(e.g., actual suffering levels, anaesthesia use, humane endpoints)
- **Current Issue:** Actual (retrospective) severity often differs from predicted; detailed per-project suffering hidden.
- **Proposed Fix:** Enhanced NTS/RAs with anonymised actual severity %, anaesthesia use, endpoint adherence.
- **Implementation Details:** Mandate retrospective details in NTS updates; aggregate for lab summaries (e.g., "% severe procedures"); no new burden — data already collected.
- **Benefits**: Core to Refinement; shows real suffering vs. predictions; accelerates minimisation.

Category 6: Training, Competence, and Supervision
(e.g., staff qualifications, oversight)
- **Current Issue**: Training records, competence assessments are internal.
- **Proposed Fix:** Anonymised overviews — % staff fully trained, supervision ratios.
- **Implementation Details:** Aggregate per establishment type; include in transparency reports; remove personal details.
- **Benefits**: Ensures competence; highlights training gaps affecting welfare.

Category 7: Statistical Returns, Non-Compliance, and General Reporting
(e.g., overall stats, breaches)
- **Current Issue**: National aggregates exist, but no facility/project breakdowns; breaches redacted.
- **Proposed Fix:** More granular national stats + anonymised per-establishment breach trends, non-compliance counts.
- **Implementation Details**: Home Office expands annual stats (e.g., severity by category); anonymise breaches (trends only); easiest/quickest category.
- **Benefits**: Enables scrutiny of compliance; exposes patterns.

These workarounds are designed to be immediate and low-cost — building on existing data collection, starting voluntary, scaling via licence conditions or guidance updates.

The report stresses: Section 24 protects specific sensitive info, not anonymised welfare stats.

Unified Implementation Framework for Data Transparency

1. Data Sourcing & Integration

To minimize administrative burden, the focus should be on repurposing existing reporting streams rather than creating new ones.

- **Utilize Existing Systems:** Pull anonymized summaries from **ASPeL** or expand **Non-Technical Summaries (NTS)** to include retrospective outcomes (e.g., actual surplus vs. planned breeding).
- **Leverage Rigorous Internal Tracking:** Labs already track genetics and surplus per Home Office guidance (via AWERB); this data simply needs to be aggregated and "de-identified" for broader reporting.

2. Phased Rollout & Transparency Tools

The transition to transparency should begin with low-stakes, high-impact voluntary disclosures.

- **Voluntary "Banded" Reporting:** Encourage labs to publish aggregated breeding summaries and "Transparency Reports" on their own websites using **aggregation, generalization, and suppression** techniques.
- **Official Statistical Expansion:** The Home Office can support this by adding high-level breakdowns to annual statistics, such as surplus percentages categorized by GA (Genetically Altered) type or research purpose.

3. Rigorous Risk Management

Protecting the anonymity of researchers and institutions is the primary barrier to transparency.

- **The "Motivated Intruder" Standard:** All disclosures must pass the **ICO's risk assessment test**. If the likelihood of a determined person re-identifying an individual or lab from public sources is "remote," the data is deemed safe for release.
- **Strategic Masking:** Apply suppression specifically to sensitive categories (e.g., rehoming stats, specific severity levels, or minor breaches) where small numbers might inadvertently identify a facility.

4. Strategic Benefits & Impact

By contextualizing the data, the report can demonstrate value to both the public and the scientific community.

- **Driving the 3Rs:** Greater visibility reveals if high surplus persists, signaling a need for better breeding strategies and a renewed focus on **Reduction**.
- **Gentle Competition & Trust:** Transparent data allows for peer benchmarking (e.g., comparing rehoming success rates) and builds public trust by proving that GA minimization is a priority—all without exposing specific methods or locations.

Here are clear, practical examples of anonymisation techniques that align perfectly with the proposals in "The Transparency Gap" report. These techniques make it possible to share meaningful summaries from the 38 detailed record areas (e.g., severity levels, rehoming rates, welfare incidents) without breaching Section 24 of ASPA (which protects specific confidential or commercially sensitive info) or UK GDPR rules on personal data.

The goal is to reduce the risk of identification — whether of labs, staff, projects, or companies — to a "sufficiently remote" level (per ICO guidance). This keeps the data useful for public scrutiny, verifying the 3Rs (Replacement, Reduction, Refinement), spotting issues, and building trust, while staying lawful and low-burden.

These draw from standard UK/EU practices (ICO anonymisation guidance, UK Data Service, statistical disclosure control methods used in government/research stats). No new laws needed — just smart application to existing records via ASPEI portals, enhanced NTS/RAs, or voluntary lab reports. These techniques mirror those used in Home Office national stats (e.g., species/GA aggregates) and could extend to lab-level without legal changes.

1. Aggregation / Grouping (Most Common & Easiest for Lab Stats)
- **What it does**: Combine individual data points into broader groups or totals so no single record stands out.
- ***Examples in animal research context***:
  - Instead of "Lab X did 47 severe procedures in 2025", report "Labs in the 'academic toxicology' category conducted an average of 12% severe procedures (range 8-18%) across 15 establishments".
  - *Rehoming*: "In basic research projects, 8% of animals were rehomed vs. 92% euthanised" (aggregated across similar project types, not per lab).
  - *Welfare incidents*: "Category Y labs reported 3-5 non-compliance events per 10,000 procedures" (binned ranges to avoid pinpointing small labs).
- *Why it works here*: Prevents "reverse identification" (e.g., someone guessing a specific pharma company's low rehoming rate). Home Office already aggregates national stats (e.g., 79% sub-threshold/mild in 2024); just extend to breakdowns by project category or establishment type.

2. Generalisation / Banding / Binning
- **What it does**: Replace precise values with broader categories or ranges.
- ***Examples:***
  - *Severity*: Instead of exact % severe (e.g., 12.4%), use bands like "<5%", "5-15%", ">15%".
  - *Staff training*: "% fully trained staff" → "High (80-100%)", "Medium (50-79%)".
  - *Breeding surplus*: "Animals bred but not used" → grouped as "low surplus (<10%)" or by ranges.
- *Why useful*: Reduces granularity while keeping trends visible (e.g., shows if severe procedures are dropping over time without exposing exact lab figures).

3. Suppression / Redaction / Nulling
- What it does: Remove or blank out data that could identify (especially if numbers are small/rare).
- ***Examples***:
  - Suppress counts below a threshold (e.g., "<5" for rehoming successes in a category to avoid identifying rare events).
  - Redact specific project codes, vet names, or proprietary techniques in NTS expansions.
  - If a lab type has only 1-2 establishments reporting breaches, suppress the figure entirely ("data suppressed to prevent identification").
- *Why it fits*: Home Office already uses thresholds in national stats; apply to lab-level summaries to block singling out small or unique facilities.

4. Pseudonymisation / Tokenisation / Masking

- **What it does:** Replace direct identifiers with artificial codes or blanks (reversible only with separate key, but often made irreversible for public release).
- ***Examples:***
  - Replace "University of Example" or "Company ABC" with "Establishment Type A" or generic codes like "Lab-001".
  - Mask staff roles: Instead of "Named Vet: Dr. Smith", say "Key roles: NACWO, NIO, NTCO present".
  - Project details: Anonymise codes or proprietary methods while keeping factual outcomes (e.g., "anaesthesia used in 95% of procedures").
- *Why effective*: ICO notes pseudonymisation reduces linkability; for public summaries, make it irreversible (no key released).

5. Adding Noise / Perturbation (for Advanced Cases)

- **What it does:** Introduce small random variations to obscure exact values while preserving overall patterns.
- ***Examples:***
  - Actual severity % slightly perturbed (e.g., true 12% becomes reported 11-13% range).
  - Used in differential privacy approaches (adding calibrated noise so one animal's data doesn't noticeably change aggregates).
- *Why relevant*: Useful for sensitive categories like daily welfare incidents if aggregation alone isn't enough; keeps utility high for 3Rs trend analysis.

6. **k-Anonymity (or Similar Group-Based Protections)**

- **What it does**: Ensure every record is indistinguishable from at least k-1 others (e.g., k=5 means hidden in a group of 5+ similar ones).
- ***Examples:***
  - Only report severity breakdowns if at least 5 similar project types/labs exist in the group.
  - Group by category (e.g., "toxicology" or "basic neuroscience") so no unique combination reveals a single lab.
- *Why it helps*: Prevents "singling out" — if a lab's stats match only one entry, suppress or aggregate further.

These techniques mirror those used in Home Office national stats (e.g., species/GA aggregates) and could extend to lab-level without legal changes. If you'd like examples for another category (e.g., Category 3 rehoming) or visuals of sample anonymised tables, let me know!

Table 1

#	Reportable Area	Implementation Workaround	Anonymisation Technique	
1a	Licence Holder Info	Aggregated statistics on the number of holders and types of changes processed.	Aggregated Statistics: Remove all names and specific entity identifiers.	
1b	Named Persons	Centralised portal for voluntary opt- in registries of roles and qualifications.	De-identification: Remove personal identifiers; provide role-based profiles only.	
1c	Licence Conditions	Public ASRU database of redacted full texts for conditions and amendments.	Redaction: Strip sensitive identifiers and commercial/legal details.	
1d	Premises Details	High-level schematic templates of layouts and animal categories.	Generalisation: Omit security-sensitive details like exact addresses or site vulnerabilities.	
1e	Project Programme	Enhanced Non-Technical Summaries (NTS) with supplementary anonymised appendices.	Aggregation/Redaction: Provide statistical overviews; redact IP-sensitive protocols.	
1f	Personal Work Logs	Aggregate data into metrics (e.g., total procedures by category) in annual reports.	Pseudonymisation: Use de-identified extracts; remove traceable activity logs.	
1g	AWERB Operations	Publish anonymised minutes focusing on 3Rs advice and decision summaries.	Anonymisation: Redact sensitive unpublished data and specific member names.	
1h	Fees and Billing	Include total fees and non-compliance rates in annual financial reports.	Aggregation: Provide total figures only; no individual breakdowns.	
2a	Demographics	Standardised templates for quarterly summaries of usage beyond annual stats.	Pseudonymisation: Breakdown by sector (academia vs. industry) without identifying establishments.	
2b	Origins/Sources	Public registry of suppliers with anonymised origin categories (e.g., "UK captive-bred").	Categorisation: Mask specific supplier identities to prevent commercial boycotts.	
2c	Dates/Timelines	Anonymised timeline audit tool generating metrics like average procedure durations.	Pseudonym Aggregates: Process as group trends rather than individual animal records.	
2d	Individual Histories	Centralised database for anonymised history abstracts (e.g., health outcome stats).	Data Minimisation: Exclude all identifiers; share only high-level health trends.	
2e	Identification	Standardised summaries in AWERB reviews on marking method frequencies.	Anonymisation: Use redacted policy excerpts to avoid exposing site-specific protocols.	
2f	Breeding Strategies	Voluntary case studies in reports highlighting successful reduction strategies.	Redaction: Strip IP-sensitive breeding techniques or genetic alterations.	
2g	Prohibitions	Aggregated breach reports regarding bans on strays or Great Apes.	Aggregation: Report outcomes of enforcement without disclosing sensitive justifications.	
3a	Use and Re-use	Track and aggregate re-use consent rates and cumulative effect categories for structured reporting.	Aggregation: Use group-level cumulative effect categories rather than individual animal histories.	
3b	Transfers	Establish secure, anonymised history abstracts for cats, dogs, and primates for potential post-project sharing.	Anonymisation: Create abstracts of health and social histories that exclude all identifying establishment data.	
3c	Disposal and Fate	Expand annual statistics to include anonymised case studies on successful re-homing (e.g., to homes or sanctuaries).	Data Minimisation: Adhere to UK GDPR by excluding adopter identifiers and specific project details.	
3d	Killing Details	Integrate anonymised competence summaries, such as aggregated method usage frequencies, into AWERB reports.	De-identification: Remove names from competence registers and provide only generalised guidance on methods.	
3e	Causes of Death	Augment annual statistics with categorised mortality trend analyses (e.g., procedure-related vs. natural causes).	Aggregation: Process mortality data anonymously to prevent revealing specific project vulnerabilities or incidents.	
4a	Daily Checks	Public dashboard of compliance metrics (e.g., "% of checks completed on time").	Pseudonymisation: Remove exact schedules or room layouts to protect security.	
4b	Veterinary Records	Publish national trends on frequent treatments and recovery timelines.	Pseudonym Aggregates: De-identify systemic insights; no individual medical dossiers.	
4c	Adverse Reactions	Expand NTS with structured intervention summaries and exceedance types.	Anonymisation: Aggregate frequencies/ themes in non-compliance reporting.	

#	Reportable Area	Implementation Workaround	Anonymisation Technique	
4d	Husbandry	Aggregate adoption rates for enrichment (e.g., "% social housing").	Generalisation: Omit facility-specific housing designs or disaster protocols.	
4e	Welfare Minimisation	NTS appendices with physiological impact metrics (e.g., stress indicator trends).	Anonymisation: Redact facility-wide operational details/IP.	
5a	Procedure Descriptions	NTS with categorical summaries of common surgical refinements.	Categorisation: Avoid IP-sensitive specifics; remove Personal Licence (PIL) names.	
5b	Severity Classes	Interactive dashboards for drill-down trends (e.g., severity by species/purpose).	Aggregation: Use group-level cumulative severity tables to hide project patterns.	
5c	Anaesthesia / NMBAs	Mandate NTS sections with anonymised regimen categories (e.g., "multi-modal").	Anonymisation: Aggregate NMBA notice/ use stats in ASRU reports.	
5d	Humane End- Points	Require NTS to include anonymised trigger and amelioration tables.	Anonymisation: Replace project-specific triggers with category-based examples.	
5e	Retrospectives	Separate RA sections in NTS focused on lessons learned and 3Rs.	Redaction: Anonymise metrics to avoid misinterpretation of scientific outcomes.	
5f	Outcomes	Aggregate morbidity/mortality and statistical efficiency trends in annual reports.	Anonymisation: Use examples (e.g., "reduction by X%") rather than raw protocols.	
6a	Training Records	National metrics on CPD refresher compliance and module uptake rates.	Aggregation: Remove individual names, qualifications, and assessment outcomes.	
6b	Competenc e Registers	Aggregate coverage stats (e.g., "% of procedures by competent staff").	Anonymisation: Strip links between specific individuals and authorized methods.	
6c	Education Needs	Include sector-wide ongoing education gap themes in guidance updates.	Anonymisation: Mask internal establishment weaknesses or staff-specific gaps.	
7a	Annual Statistics	Develop interactive dashboards in annual statistics for drill-down trends by species, purpose, and year.	Aggregation/Anonymisation: Present data at a national or sector level (e.g., academia vs. industry) to prevent identifying specific establishments.	
7b	Non-Compliance	Conduct themed root-cause analyses of breaches to identify lessons learned and rectification success rates.	Thematic Reporting: Report on broad themes and categories of non-compliance (as seen in ASRU reports) rather than specific incident details.	
7c	General Reporting	Implement annual establishment transparency reports (voluntary or mandatory via licence condition).	Redaction: Remove all sensitive personal or corporate identifiers from establishment- level reports.	
7d	Retrospecti ve Assessment	Ensure Retrospective Assessments (RAs) are integrated into Non-Technical Summaries with clearer lay language.	Anonymisation: Use standardized glossaries and structured formats to share 3Rs lessons without revealing proprietary research.	

Rank order -Ease of Implementation

Here is a complete ranking of all 38 suggested workarounds (one per reportable area under ASPA) from easiest to hardest to implement.
The ranking is based on objective factors:

- How much it relies on existing systems (ASRU annual reports, national statistics, NTS, ASC 2025 recommendations) vs. new infrastructure or databases.
- Whether it is a simple content addition (easiest) or requires new tools, opt-in schemes, mandates, or policy amendments (hardest).
- Cost, time, and coordination needed (e.g., voluntary vs. mandatory, tech development vs. just updating a PDF report).
- All workarounds are already lawful (no new legislation required), but effort varies.

Easiest (Level 1) – Pure additions/expansions to existing ASRU annual reports or national statistics

(Immediate policy decision by ASRU/Home Office; no new tech, no new mandates beyond current publishing cycle; ~15 workarounds)

- 3e Causes of Death/Mortality (augment annual statistics with categorised mortality trends)
- 1h Fees and Billing (include aggregated financial data in ASRU reports)
- 7c Notifications (aggregate volumes & compliance timelines in ASRU reports)
- 2f Breeding Strategies (expand statistics with voluntary anonymised case studies)
- 3c Disposal and Fate (expand statistics with anonymised re-homing case studies)
- 4b Health and Veterinary Records (publish anonymised national trends in ASRU reports)
- 4d Husbandry and Enrichment (aggregate adoption rates in ASRU reports)
- 5f Outcomes and Refinements (aggregate morbidity/mortality trends in ASRU reports)
- 6a Training Records (publish anonymised national/sector metrics in ASRU reports)
- 6b Competence Registers (aggregate competence coverage statistics)
- 6c Education Needs (include sector-wide gap themes in ASRU reports)
- 7b Non-Compliance Incidents (expand ASRU reports with root-cause analyses)
- 3d Killing Details (integrate anonymised summaries into AWERB reports + ASRU excerpts)
- 2e Identification and Marking (incorporate standardised summaries into AWERB reviews)
- 3b Transfers and Movements (aggregated transfer registry in ASRU reports)

Easy (Level 2) – Enhancements or requirements to existing NTS (leveraging mandatory NTS + ASC 2025 recommendations already published)
(Per-project but fully anonymised; ASC framework already exists)

1e Project Programme of Work (supplementary anonymised NTS appendices)
3a Use in Procedures (enhanced anonymised NTS appendices)
4c Adverse Reactions (structured anonymised intervention summaries in NTS)
4e Welfare Minimisation (NTS appendices with impact metrics)
5a Procedure Descriptions (categorical anonymised summaries in NTS)
5c Anaesthesia, Analgesia, NMBAs (mandate anonymised regimen categories in NTS)

5d Humane End-Points (mandate anonymised trigger tables in NTS)
5e Retrospective Assessments (standardised separate RA sections per ASC)
7d Non-Technical Summaries (fully implement ASC 2025 standardised templates)
5b Severity Classifications (anonymised cumulative tables in NTS)

Medium (Level 3) – Standardised templates, voluntary case studies/sharing, or FOIA streamlining

(Minor process updates or encouragement of voluntary action)

- 1d Establishment Premises (standardised high-level schematic templates)
- 2a Numbers and demographics (standardised FOIA template for quarterly summaries)
- 1f Personal Licence Work Logs (aggregate metrics + voluntary redacted sharing)
- 2g Prohibitions and Exemptions (mandate anonymised summaries in non-compliance reports)
- 1g AWERB Operations (anonymised minutes with redactions on ASRU website)
- 3d (partial overlap already counted)
- 4a (metrics part only)

Medium-Hard (Level 4) – New interactive tools, certification schemes, or mandated redacted databases

(Requires some web development or new guidance + opt-in/mandate)

- 7a Annual Statistical Returns (interactive/visual dashboards on gov.uk)
- 5b Severity Classifications (interactive dashboards in statistics)
- 4a Daily Checks (public dashboard option)
- 2b Origins and Sources (certification scheme + public registry on gov.uk)
- 1c License Conditions and Amendments (mandating redacted full texts in public ASRU database)

Hardest (Level 5) – New centralised systems, opt-in registries, or e-licensing tool changes (Requires infrastructure investment, coordination, or policy tweaks)

1b Named Persons' Details (voluntary public opt-in registries)
2c Dates and Timelines (anonymised timeline audit tool within ASRU's e-licensing system)
2d Individual History Files (centralised secure database under ASRU)
1a License Holder Information (anonymised summaries + explicit policy amendment to ASPA for redacted FOI)

Summary of why this order makes sense

Top 25 (Levels 1–2) can be rolled out in months with existing staff and publishing cycles (just "add this section to the next ASRU report or NTS template").
Middle 8 (Level 3–4) need small extra steps (templates, dashboards, certification) but still use current platforms.
Bottom 5 (Level 5) involve new databases/tools or opt-in coordination, so they take longer and need more planning/budget.

All 38 remain fully lawful under Section 24 ASPA, UK GDPR, and FOIA. The report itself notes that the only barrier is "the will to do this." Starting with the top-ranked (easiest) ones would deliver the biggest immediate transparency gains with almost zero friction.