



Dr Sally Robinson  
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Dear Sally,

Thank you for your letter of 30 September 2025 enclosing the Animals in Science Committee's report on non-technical summaries (NTS) and retrospective assessments (RA). This report follows a commission from the Home Office in November 2024 for advice on improvements to the quality and utility of NTS and RA content to support openness and transparency in alignment with the Animals (Scientific Procedures) Act 1986 (ASPA).

I am grateful to the Committee for its thorough and detailed work in fulfilling this commission. The report reflects careful consideration of a wide range of evidence and perspectives from a range of stakeholders including engagement with the National Centre for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs). I particularly welcome the Committee's focus on improving public understanding of licensed scientific work and maintaining high standards of welfare and scientific quality. The resulting report provides clear and focused recommendations.

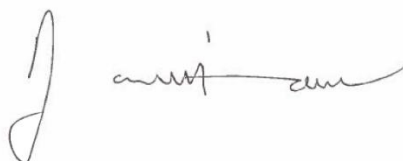
The NC3Rs' review of the project licence application process includes some areas of overlap with the ASC recommendations on NTS and RAs. Its work focuses on reforms to the structure, content and clarity of the licensing processes in order to enhance the approach to the principles of replacement, reduction and refinement. To ensure a coherent, joined-up approach and to avoid duplication or re-work, the Home Office has grouped the recommendations into two categories, those that we can respond to now, and those requiring further consideration alongside the NC3Rs recommendations.

For the recommendations that we can respond to now, the Home Office position is detailed in Annex B. I have asked the Animals in Science Regulator to implement these by updating operational processes and providing revised guidance to applicants and regulated establishments, as appropriate.

The recommendations which will be considered alongside the NC3Rs recommendations are detailed at Annex C. I will correspond with you again regarding the Home Office's response to the recommendations outlined in Annex C.

I would like to thank the Committee once again for its contribution. I value the Committee's advice and its continued role in supporting transparency, public confidence and the effective regulation of animal use in science.

Yours sincerely,



**Lord Hanson of Flint**

**Annex B – Recommendations that the Home Office is responding to now**

	Recommendation	Response	Delivery Actions	Delivery Date
3	The Regulator should develop a standardised lexicon of key terms.	Partially accepted	<p>The Home Office agrees that key terms should be accessible to the public. However, developing and continually updating a comprehensive, standardised lexicon goes beyond the Regulator's statutory role. Maintaining such a resource would require ongoing scientific and technical interpretation across a wide range of evolving procedures. This would be more appropriately led by specialist scientific institutions whose primary role is to develop and curate scientific knowledge rather than a regulatory body whose primary function is in oversight and assurance.</p> <p>We consider that the intended outcome of this recommendation will be achieved through recommendation 4, which is accepted in principle and will be reviewed alongside the NC3Rs' recommendations.</p>	To be confirmed in the response to recommendations at Annex C.
5	Applicants must include lay members in NTS and RA reviews and explore external tools for assessing readability.	Accepted in principle	<p>The Regulator (ASRU) will communicate this recommendation to establishments, emphasising the importance of robust internal review processes to emphasise the importance of review processes for NTS and RAs to ensure accessibility and public readability.</p> <p>There is no legal requirement for applicants to include a lay</p>	ASRU will communicate with establishments on the recommendation by 31/07/2026.

			<p>member in the review NTSs or RAs. Establishments will be encouraged to achieve the intended outcome of accessibility through appropriate means, which may include the involvement of lay members and/or the use of suitable tools or technologies to assess readability.</p> <p>Where technological tools are used, responsibility for the quality, accuracy and suitability of the final NTS or RA remains with the applicant.</p>	
9	<p>The Regulator should incorporate a review of RA completion into the audit process, noting any failure to complete RAs as a minor concern in the audit report. The Regulator should investigate the causes for establishments not submitting RAs (or submitting RAs late) and put mitigation steps in place to prevent this from happening.</p>	Accepted	<p>This will be incorporated into the audit programme for 2027.</p>	Commencing in 2027.
11	<p>Applicants should engage with further NTS and RA guidance and share these within their networks to support improved scientific communication across the sector.</p>	Accepted	<p>ASRU will communicate this recommendation to establishments.</p>	<p>ASRU will communicate with establishments by 31/07/2026.</p>
12	<p>In the short-term, the Regulator should make improvements to the process in which RAs are published, including:</p> <ol style="list-style-type: none"> <li>1. Separating the existing "RA required" PDF into two distinct documents: one for projects awaiting RA publication, and one for those with published RAs. When RAs are published quarterly, they should be moved</li> </ol>	Accepted in principle	<p>The Home Office agrees with the aims of this recommendation and recognises the potential to improve the way in which RAs are published, including improving clarity, accessibility and searchability for users.</p> <p>ASRU will explore options for how best to deliver these improvements in practice, taking account of internal processes, existing publication arrangements and wider developments in how</p>	<p>ASRU will explore improvements to be made to the publication process by 31/12/2026.</p>

	<p>from the “RA required” to the “RA published” document.</p> <p>2. Updating the titles and descriptions of the annual NTS collections to make it clear that they also serve as repositories for published RAs.</p> <p>3. Creating a dedicated RA collection page on the GOV.UK website that clearly signposts where and when RAs are published.</p>		<p>information is presented on GOV.UK. This will help assure that any changes are implemented in a way that is effective, proportionate and sustainable, while delivering the intended outcome of clearer and more accessible information on RAs.</p>	
13	<p>The Regulator should facilitate the implementation of a searchable database for NTSs and RAs.</p>	<p>Accepted in principle</p>	<p>The Home Office has developed a prototype search tool for published NTSs and will further test the feasibility of implementation. Implementation will be subject to budgetary considerations.</p> <p>As with recommendation 12 the Home Office may explore other options to achieve the same outcome to ensure a coherent, efficient and effective overall response.</p>	<p>The Home Office will test implementation feasibility by 31/03/2027.</p>
14	<p>Establishments should consider self-publishing NTSs and RAs (or summaries of them) on their own websites where appropriate, to promote transparency, and look for further opportunities to disseminate advances in the 3Rs whenever possible.</p>	<p>For the regulated sector’s consideration</p>	<p>The Regulator will communicate this recommendation to establishments, highlighting self-published NTSs and RAs as one potential way of promoting transparency, where appropriate.</p> <p>Decisions on whether to self-publish will remain a matter for establishments, taking account of their specific circumstances, including feasibility, proportionality and any associated risks.</p>	<p>ASRU will communicate with establishments by 31/07/2026.</p>

**Annex C – All recommendations to be considered alongside the NC3Rs recommendations on the project licence application**

	Recommendation
1	The Regulator should expand, publish and improve access to guidance on the likely adverse effects and severity of common procedures.
2	The Regulator should make it clear across guidance documents and in the PPL application form that there is not a word limit for the NTS or RA.
4	The Regulator should allow for a glossary of technical terms within NTSs and RAs.
6	The Regulator should revise the ASPeL PPL application endorsement to confirm that a lay person has reviewed the NTS for clarity. Current wording confirms AWERB/PEL approval and that the summary is written in lay language; this should be strengthened to include lay review of writing style.
7	The Regulator should revise the NTS section in the Guidance Notes for Project Licence Applications to: <ul style="list-style-type: none"> <li>a) Include a clear explanation of the NTS, setting out its definition, intended audience, and the importance of completing it comprehensively.</li> <li>b) Seek external advice to improve lay language examples with short explanations as to how they are non-technical.</li> <li>c) Seek external advice to publish an annotated example of best practice in writing an NTS.</li> <li>d) Reduce the total length of the note by separating out the NTS guidance into its own document. The NTS guidance should be summarised in a single smaller document in an accessible, easy to read, format.</li> </ul>
8	The Regulator should develop a separate RA Guidance Note in a similar format to the suggested standalone NTS guidance, including a clear definition and explanation of the importance of a well written RA, setting out its intended audience, an annotated example of best practice in writing an RA, and lay language examples with short explanations as to how they are non-technical.
10	The Regulator should incorporate learning outcomes on NTSs and RAs into the mandatory PPL courses, ensuring all applicants receive guidance on communicating scientific content in accessible language.
15	The Regulator should review its internal policies and guidance on assessing “non-technical language” to ensure that Inspectors are fully aware of their responsibilities under ASPA.
16	The Regulator should make improvements to the PPL form, including: <ul style="list-style-type: none"> <li>a) Removing the auto-population function of the NTS.</li> <li>b) Enabling applicants to export the NTS section as a Microsoft Word or OpenDocument file.</li> <li>c) Incorporating or signposting guidance within the form</li> </ul>