



Strengthening the Effective Functioning of Named Persons

1 October 2026

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1. Executive Summary

In January 2025, the Home Office commissioned the Animals in Science Committee (ASC) to provide advice on the Named Information Officer (NIO). Following agreement with the Minister, this was extended to examine the effectiveness of all statutory Named Roles required under the Animals (Scientific Procedures) Act 1986 (ASPA).

This report sets out the ASC's recommendations on establishment support, access to training, protected time and resource, communication, and the underpinning governance arrangements. To inform its recommendations, the ASC circulated a call for evidence to gather feedback from Named Persons and supplemented these findings with evidence from the NC3Rs NIO Survey (NC3Rs, 2024) and the report on Understanding Named Persons' Priorities in Response to the Home Office's Animal in Science Regulation Unit (ASRU) Reforms (Goldie, 2024). The commission's direction and the ASC's deliberations were informed by a review of the relevant literature alongside this evidence.

A central finding of this review is that significant determinants of the effectiveness of Named Persons are cultural within the establishment. Specifically, establishments should foster a culture of continuous improvement in which Named Persons are recognised as valued sources of expertise and are supported to contribute effectively.

Achieving this requires leadership and commitment from key governance bodies and individuals, including the Establishment Licence holder (PELh), Animal Welfare and Ethical Review Bodies (AWERB), and senior management. These stakeholders play a critical role in creating an environment in which Named Persons can flourish and fully exercise their responsibilities.

The ASC suggests that the Regulator's primary role in relation to these recommendations will be to provide proportionate assurance, through audit and oversight, that the recommendations are implemented effectively, using its training framework to address identified training needs. By highlighting areas of improvement with establishments, the ASC anticipates that the Regulator's audit activities will reinforce these recommendations, support consistent implementation across establishments, and promote continuous improvement.

The ASC also recommends that project licence holders/applicants seek advice at an early stage from the Named Roles during the preparation of project licence applications. Early engagement with these key roles can help ensure that opportunities to implement the 3Rs (Replacement, Reduction, and Refinement) are fully considered.

These recommendations are intended to guide establishments in ensuring the effective functioning of Named Persons and to support the Regulator in promoting this through effective training and audit. By strengthening the support, recognition, and integration of Named Persons within establishments, these recommendations aim to enhance the delivery of high standards of animal welfare and scientific quality, while fostering a culture of continuous improvement.

2. Summary of Recommendations

Recommendation 1: The PELh/NPRC should ensure that documented governance arrangements are available that set out responsibilities, reporting structures, and communication pathways for all Named Roles.

Access to training

Recommendation 2: The PELh/NPRC should ensure that there is sufficient budget to allow Named People to have access to appropriate training and CPD. Records should be kept by the PELh/NPRC to demonstrate support provided.

Recommendation 3: The Home Office should signal, through the training framework, the need for improved training, including:

1. Future development of a mandatory training module for both NTCOs and NIOs,
2. Formalising endorsement of LASA, LAVA, and IAT Guiding Principles for Named Roles.
3. The need for the inclusion of soft skills in Named Person mandatory training, such as management of rebuttals and conflict management.

Recommendation 4: The Regulator, with input from relevant professional bodies, should define minimum CPD expectations for Named Persons, including expectations for maintaining role-specific competence.

Protected time and resource

Recommendation 5: The PELh/NPRC should ensure that Named Persons are provided with adequate resources, including administrative and operational support where required, and sufficient protected time to fulfil their roles effectively.

Communication

Recommendation 6: The PELh/NPRC should hold regular Named Persons meetings to support coordination across roles, ensuring early identification of issues. Records should be kept by the PELh/NPRC to demonstrate support provided.

Recommendation 7: The PELh/NPRC should implement and document mechanisms to support effective engagement between licence holders/applicants and Named Roles, and the AWERB should routinely review the effectiveness of these arrangements.

Recommendation 8: Establishments, including PEL holders and AWERBs, should ensure that Named Persons' advice is appropriately considered and informs decision-making. Proportionate records of the advice from Named People should be available.

Recommendation 9: AWERBs and PPL applicants should ensure that NIOs, alongside other relevant Named Persons, are appropriately engaged in the development and conduct of licensed projects.

Recommendation 10: AWERBs should establish and document mechanisms that ensure that Named Persons and other individuals can raise animal welfare concerns and challenge behaviours, processes, and procedures.

Governance and compliance

Recommendation 11: The PELh/NPRC should ensure that there are clear processes to manage and review conflicts of interest.

3. Introduction

3.1 Context

In January 2025, the Home Office commissioned the ASC to provide advice on both AWERBs and the NIO (Home Office, 2025a). Following agreement with the Minister (Home Office, 2025b), the commission was divided into two complementary pieces of work: one examining the functioning of AWERBs and the other examining the effectiveness of the statutory Named Roles required under ASPA.

Advice was sought on strengthening the effectiveness of the NIO and other Named Roles. In the ASC's report on Strengthening Leading Practice in the Animals in Science Sector (Animals in Science Committee, 2025), leading practice was defined as “the continuous, iterative process of evolving practices surrounding the use of animals in science which, in the context of the delivery of the scientific outcome, are considered to be at the forefront for the protection and welfare of the animal based on scientific evidence and understanding at the present time, aligned with 3Rs principles.” This report will focus on what establishments can do to create an environment that fosters a culture of respect and support for the Named Roles, recognising that effective engagement with the Named Roles is an important component of achieving leading practice in animal welfare and the application of the 3Rs.

The commission highlights that, “beyond the high-level requirements of the *Guidance on the Operation of ASPA*, there are no consolidated standards provided or formally endorsed by the Government.” Although a range of guidance and good practice resources exists, including Named Role-specific guidance (LASA, LAVA and IAT, 2023), the ASC has a unique opportunity to consider Named Roles in a cross-cutting and collective manner. This report builds on existing guidance by identifying areas where current standards could be formally endorsed by government, as well as highlighting gaps where further guidance or support may be beneficial. Evidence gathered through stakeholder engagement will be considered alongside a review of existing literature and guidance to inform the development of recommendations.

3.2 Introduction to Named Roles

Under ASPA, every establishment licence must identify individuals to fulfil several statutory Named Roles. Collectively, these roles provide the governance framework that supports animal welfare, regulatory compliance, competence, veterinary oversight, and the implementation of the 3Rs within licensed establishments. Although each role has distinct statutory responsibilities, their effective functioning depends on close collaboration, clear communication, and appropriate organisational support. Table 1 summarises the definitions of the Named Roles, as set out in the *Guidance on the Operation of the Animals (Scientific Procedures) Act 1986* published by the Home Office (Home Office, 2023).

Table 1: Definition of Named Roles

Establishment licence holder (PELh)	The PELh is responsible for ensuring that the conditions of the establishment licence are complied with, and have a number of responsibilities, including but not limited to: • providing leadership; • ensuring compliance; • ensuring the 3Rs are applied as fully as possible; • ensuring the establishment has enough staff; • setting up and running an Animal Welfare and Ethical Review Body (AWERB); • the performance and conduct of Named Persons; • avoidance of conflicts of interest; • ensuring animals have appropriate care and accommodation; • maintaining a register of those competent to kill protected animals.
Named Person Responsible for Compliance (NPRC)	Where the holder is a corporate entity, the individual legally accountable for the corporate entity, and therefore the legal responsibility of the establishment licence holder, can delegate responsibility for compliance to the NPRC who, for all practical purposes, will fulfil the role and responsibilities of the PELh.
Named Animal Care and Welfare Officer (NACWO)	NACWOs are responsible for overseeing the day-to-day husbandry, care and welfare of the protected animals held at their establishment.
Named Veterinary Surgeon (NVS)	The NVS is responsible for, monitors and provides advice on the health, welfare and treatment of animals. They provide independent veterinary advice on animal care, treatment, pain relief, and humane endpoints, and must be consulted on matters affecting animal welfare.
Named Training and Competency Officer (NTCO)	The NTCO is responsible for ensuring that all those dealing with animals are adequately educated, trained and supervised until they are competent and that they continue to undertake appropriate further training to maintain their expertise.
Named Information Officer (NIO)	The NIO is responsible for ensuring that those dealing with animals in the establishment have access to information they need about the species held there and procedures being performed.

Further guidance on the roles of the PELh/NPRC, NTCO, and NIO has been developed jointly by the Laboratory Animal Science Association (LASA), the Laboratory Animal Veterinary Association (LAVA) and the Institute of Animal Technology (IAT) (LASA, LAVA and IAT, 2023). This report builds on these existing resources by considering the Named Roles collectively and examining the factors that influence how effectively they can exercise their responsibilities.

3.3 Issue

The effectiveness of Named Roles varies significantly between establishments. While guidance exists, it is not formally endorsed by the Government or applied consistently across

establishments. As a result, Named People do not always receive the support, role recognition, protected time, or training necessary to exercise their responsibilities effectively. The impact of Named Roles is often dependent on local governance and the prevailing organisational culture.

The original request for advice was intended to build upon the findings of the NC3Rs-commissioned report into regulatory review mechanisms published in February 2023, commonly referred to as the Rawle Report (Rawle, 2023). It highlighted “the need to better define and resource the role of the NIO” and that “the expectations of the NIO role should be set out clearly at each establishment in line with ASPA and LASA/IAT guidance.” Data from the NC3Rs ongoing project on supporting the NIO role indicated that 45.9% of respondents reported that additional allocated time from their establishment would support delivery of the NIO role. In addition, 32.4% identified role recognition and identity and access to training as key establishment-level provisions to support effective role delivery (NC3Rs, 2024).

The Rawle report recommends that ASRU “should cover the effectiveness of the NIO role in their audits; and, has the opportunity to clarify expectations for training of AWERB members and to confirm via audit that these are being followed” (Rawle, 2023). While Rawle recommends this, delivery would be challenging since there is currently no mandatory training framework for NIOs that would provide a consistent standard which could be audited against. In addition, the RSPCA AWERB-UK meeting in 2025 identified five operational challenges for AWERBs, including a lack of training and Continuous Professional Development (CPD) for Members as a key issue (RSPCA, 2025). Data from the NC3Rs ongoing project on supporting the NIO role identified that 46.8% of NIOs had not received any NIO-specific training (NC3Rs, 2024).

4. Methodology

4.1 Evidence gathering

The ASC were asked to provide advice on actions that could strengthen the functioning of the NIO and other Named Roles. Recommendations were informed by reviewing available evidence and stakeholder responses to our evidence gathering exercises.

The ASC circulated a call for evidence with an internal AWERB distribution list, through other organisations, for example LASA, and with the Home Office Liaison, Training, and Information Forum on 3 March 2026. The aim of the call for evidence was to gather stakeholder views on the Named Roles they held to inform the scope of this report.

Stakeholder responses were analysed using a thematic approach. Emerging themes were compared with the *Guidance on the Operation of ASPA*, relevant sector guidance, and the expected responsibilities of Named Roles. Unmet needs were identified and used to inform the development of recommendations. The survey was designed to complement the ongoing project by the NC3Rs on supporting the NIO role (NC3Rs, 2024) and can be found at Annex C. A breakdown of respondents by stakeholder group and quantitative results can be found at Annex D.

While the estimated call for evidence reach was relatively limited (N = 99) the ASC has supplemented the findings with supporting evidence from the NC3Rs NIO Survey (NC3Rs, 2024) and IAT's commissioned report on Understanding Named Persons' Priorities in Response to the Home Office's Animal in Science Regulation Unit (ASRU) Reforms (Goldie, 2024). These additional sources provide further context and help validate key themes identified through the call for evidence.

The ASC would like to thank everyone who contributed evidence so constructively for this report and acknowledge the breadth and depth of opinions received.

As directed by the commission, the ASC has reviewed the Rawle report (Rawle, 2023), the AWERB induction and training survey report (RSPCA, 2024), and the RSPCA's report on Strengthening AWERBs (RSPCA, 2025), alongside their accompanying references. More broadly, the ASC has considered literature as cited throughout the report.

4.2 Focus

In responding to the commission's request for advice on strengthening the functioning of AWERBs and the NIO role, the ASC's primary focus has been on measures to strengthen the effectiveness of Named Persons more broadly. The ASC believes that the most significant determinants of success in the effectiveness of Named Persons are cultural within the establishment. Specifically, establishments should foster a culture of continuous improvement in which Named Persons are recognised as valued sources of expertise and empowered to contribute effectively.

Achieving this requires leadership and commitment from key governance bodies and individuals, including the PELh, AWERB, and senior management. These stakeholders play a critical role in creating an environment in which Named Persons can flourish and fully exercise their responsibilities. Accordingly, the recommendations in this report are directed primarily at the practical measures, governance arrangements, and support mechanisms that can underpin and sustain a culture of continuous improvement and strengthen the contribution of Named Persons.

5. Review of Named Roles functioning

5.1 General findings

The call for evidence provided a unique opportunity to examine the contribution of Named Persons across a range of establishment types. Respondents consistently reported successes in animal welfare, including the implementation of refinements or replacements, improvements to establishment processes, and contributions to a positive culture of care.

Outside of these reported successes, respondents also identified several role-specific achievements. NACWOs reported improving welfare standards alongside success in acting as a source of advice and experience to support colleagues. NVS respondents emphasised the identification and/or implementation of a refinement or replacement. NTCO successes were closely linked to the delivery and improvement of training programmes. NIOs frequently reported success in creating a focal point for the sharing of good practice relating to the 3Rs.

When respondents were asked to suggest what their roles should be doing, most identified additional opportunities to further support animal welfare and improve practice. Where respondents indicated that certain activities should not form part of their role, this was typically because they considered those activities to detract from their capacity to deliver greater welfare, training, or support benefits elsewhere within the establishment.

The following subsections (4.2-4.6) will explore the most common issues in more detail. Sections 6, 7, 8, 9, and 10 will explore the role of the establishment licence holder, Regulator, AWERBs, and Named People respectively in addressing these issues.

5.2 Support from establishments

Approximately 35% of responding NACWOs and NTCOs, and 54% of NVSs, reported no additional establishment support needs, suggesting that existing support arrangements, typically led through the PELh/NPRC and wider establishment governance structures, are meeting expectations for a substantial proportion of respondents. By comparison, only 12% of NIOs in our survey (and 8% in the NC3Rs (2024) dataset) reported no further support needs, indicating that NIOs may have the greatest level of unmet support requirements.

Across all Named Roles, respondents highlighted a need for greater organisational support, although the specific challenges varied according to the nature of each role. NACWOs reported a wide range of support needs, including increased capacity, improved communication channels, additional training opportunities, and greater recognition of the importance of the role. NVS respondents most commonly requested additional budget and resources to support veterinary delivery and welfare initiatives. NTCOs and NIOs most frequently identified a need for increased capacity and protected time to fulfil their responsibilities effectively.

5.3 Access to training

Appropriate training was identified as a common need across all Named Roles. However, access to role-specific training was reported to be inconsistent, with respondents from several roles indicating that their most recent role-specific training had taken place more than five years previously. NTCOs and NIOs reported particularly limited access to role-specific training, reflecting the absence of mandatory training requirements for these roles.

Some NIO respondents continue to report uncertainty regarding the role definition and responsibilities of their role. However, the ASC considered that both the *Guidance on the Operation of ASPA* (Home Office, 2023) and role-specific guidance (LASA, LAVA and IAT, 2023) provide detailed descriptions of the associated responsibilities. The NC3Rs (2024) survey reports that 89% of NIOs have read this guidance, and recommendations from the Rawle (2023) report in 2023 outlined the need for the establishment to set out the NIO role clearly in line with this guidance. With the availability of information and historical high-profile recommendations to establishments, Named People should be expected to understand the responsibilities associated with their appointment. Improved access to training in this area could support greater consistency in the delivery of Named Roles across establishments.

5.4 Protected time and resource

Protected time and resources were identified as a common theme across all Named Roles. However, respondents appeared to differentiate between a need for dedicated time to fulfil

their responsibilities and a desire to reduce the scope of those responsibilities. Many respondents sought formally protected time to undertake their role effectively, whereas others expressed concern that the accumulation of additional duties limited their ability to focus on activities that delivered the greatest benefits.

A key survey finding was the number of Named and other roles held by individual respondents. This was particularly notable for NIOs, who, when both Named Roles and other work-related responsibilities were considered, held an average of 3.4 roles. In comparison, non-NIO respondents held an average of 2.5 roles. This suggests a significantly higher level of role accumulation among NIOs wherein time constraints were frequently cited as a barrier to effective delivery. This could suggest that the NIO role is seen as less important or impactful in establishments.

Challenge 1 from the RSPCA's Strengthening the AWERB report (RSPCA, 2025) highlights the lack of recognition and reward for AWERB members, and our findings suggest that this can be extended to the Named People more generally. While this is not outwardly stated in many of the respondents' answers, concerns regarding time and resources may be linked to wider issues surrounding the recognition and prioritisation of these roles within establishments. The NTCO and NIO were at greatest risk of role accumulation and had a significant number of responses flagging that capacity was an issue, suggesting a greater lack of role recognition.

5.5 Communication

Communication and engagement within the establishment was identified as a challenge. For the NVS and the NACWO, this issue was framed as managing the balance between animal welfare considerations and scientific objectives within study delivery. This was seen in our call for evidence as some survey respondents reported difficulties in engaging with, and escalating concerns to, Project Licence holders (PPL holders) and applicants.

Disagreements or tensions regarding introducing new welfare measures can arise naturally where it is unknown whether the improvements might impact scientific outcomes. Where concerns are raised about the potential impact of a proposed refinement on scientific outcomes, consideration should be given to the evidence supporting those concerns, including whether there is a demonstrable risk that the refinement would adversely affect the study. Establishments should reinforce the expectation that the most refined method should be adopted unless there is a clear and evidence-based justification to the contrary, with PPL holders and applicants responsible for demonstrating where a proposed refinement may compromise the project's scientific objectives.

Named Persons are subject matter experts within their respective areas of responsibility, and governance arrangements should reflect this expertise. Establishments should ensure that Named Persons are able to raise concerns, provide advice, contribute their expertise, and ensure that their advice receives due consideration alongside scientific and other relevant perspectives, supporting balanced decision-making.

5.6 Governance and compliance

Some Named Persons reported gaps in the availability of guidance and training needed to support decision-making in specialist areas. This included requests for updated guidance on Schedule 1 methods for humane killing, severity assessment, and species-specific

resources and training courses. Addressing these gaps would strengthen the ability of Named Persons to provide informed advice and support consistent application of standards across establishments.

Results from the questions on external support needs and role challenges drew particular attention to interactions with the Regulator. Notably, 33% of responding NTCOs identified advice from the Regulator or Home Office as a key requirement to help them deliver their responsibilities. While the ASC did not consider that all requests for support would necessarily be best addressed by the Regulator, such as the provision of case studies on effective training record systems, these findings nevertheless point to a broader issue regarding the perception of a lack of regulatory support available to assist Named Persons. The ASC considered that this also reflects the importance of effective establishment-level governance. Strong internal support structures, clear routes for escalation, and mechanisms that enable Named Persons to challenge decision-making are necessary complements to regulatory oversight.

The loss of local Inspectors was referenced by multiple respondents across a variety of Named Roles. This report will not advocate a return to the previous model; instead, it will focus on how establishment-level governance and support arrangements can be further developed in response to the changed regulatory model, with emphasis on establishing more effective communication and guidance mechanisms going forward within the establishment.

6. Support from establishments

6.1 Role of the Establishment Licence Holder

The PELh/NPRC is typically the most direct link between the AWERB and senior leadership, and in some organisations forms part of that leadership. The role has an important responsibility in ensuring that Named Roles receive appropriate support to function effectively and will therefore need to be responsible for implementing recommendations relating to other Named Roles.

Resources for PELh/NPRC emphasise the importance of visible leadership, noting that the role carries significant responsibilities for governance, compliance, and ultimately animal welfare (LASA, LAVA and IAT, 2023). Similarly, AWERB-focused work has highlighted the importance of securing the interest and support of senior management, which enables adequate funding and resources, as key aspects of an effective AWERB and a strong Culture of Care (RSPCA, 2025).

Several challenges were identified across Named Roles relating to organisational support and culture. Strengthening these areas would improve the ability of Named Persons to effectively exercise their responsibilities. The PELh/NPRC are subject to several Standard Conditions that could be used to support and strengthen the delivery of Named Roles, outlined in Table 2.

Table 2: Standard Conditions relating to the PELh/NPRC and Named People

15*	The licence holder shall nominate and be responsible for the performance of Named Persons, acceptable to the Secretary of State, as required by section 2C(5).
16	Arrangements to ensure that animals are given adequate care must be made in the event that the Named Persons referred to in condition 15 above are not available for any reason.
6.1*	The licence holder is required to have established, and to maintain, an Animal Welfare and Ethical Review Body. <i>One of the general tasks of an AWERB is to support the Named People.</i>
21*	The licence holder shall make adequate and effective provision for regular and effective liaison with and between those entrusted with responsibilities under the Act and with others who have responsibility for the welfare of the protected animals kept at the establishment.

*The most relevant requirements are highlighted in orange, and will be referred to specifically in this report, alongside a couple of additional conditions that either support these requirements or relate more broadly to the responsibilities of Named Persons.

The Named People have an advisory role to the PELh/NPRC who is in turn responsible for their performance. In many institutions direct line management of Named People sits within the animal facility structure or other departments, which can create a gap between the PELh/NPRC and the Named People. Despite this, there are ways that the PELh/NPRC can fulfil their responsibilities.

While there should be acceptable diversity in how establishments organise and support Named Roles, there should also be clear and documented governance arrangements setting out responsibilities, reporting structures, and communication pathways. Such documents could be included as part of Regulator audit.

Responses to the call for evidence highlighted uncertainty regarding role definitions and responsibilities, while the RSPCA's Strengthening the AWERB report (RSPCA, 2025) identified a need for greater professionalisation of the AWERB system. The ASC considered that uncertainty regarding role responsibilities could be addressed, in part, through mandatory role-specific training. However, the visibility and influence of Named Roles within establishments could be further strengthened through the establishment of clearly defined governance and reporting structures. The ASC therefore considered that the roles, responsibilities, and lines of accountability associated with Named Roles should be formally documented within establishment management structures. Such arrangements should be sufficiently clear and accessible to allow review and audit by the Regulator.

Recommendation 1: The PELh/NPRC should ensure that documented governance arrangements are available that set out responsibilities, reporting structures, and communication pathways for all Named Roles.

The PELh/NPRC should promote a culture that supports the effective functioning of Named Persons by providing visible leadership, fostering regular communication and collaboration,

recognising the contribution of the Named Roles, and ensuring they have appropriate support and resources.

Under section 2C of ASPA, the PELh/NPRC is responsible for ensuring that activities conducted within the establishment are consistent with the principles of the 3Rs. While aspects of this responsibility may be delegated, accountability for ensuring compliance with the 3Rs remains legally with the PELh/NPRC. In practice, this responsibility can be effectively supported through a well-functioning AWERB, supported through Standard Condition 6.1 (Table 2). The ASC will consider the effective functioning of AWERBs in a separate commission and continue this report's primary focus the effectiveness of the other Named Persons, with a large proportion of recommendations aimed at how the PELh/NPRC can support effective Named Persons functioning.

7. Access to training

7.1 Role of the Establishment Licence Holder

As senior leaders that either hold the budget or who can influence it, the PELh/NPRC should ensure that sufficient budget is available to allow Named People to have access to appropriate training and CPD, including support for both technical and non-technical competencies, to ensure effective role performance. This is further supported through Standard Condition 15 (Table 2). Evidence of how this support is implemented within the establishment should be documented to support Regulator audit. This could include information such as the training courses attended or facilitated for Named Persons during the reporting period, the number of meetings held with Named Persons, and other activities undertaken to support Named Person functioning.

Recommendation 2: The PELh/NPRC should ensure that there is sufficient budget to allow Named People to have access to appropriate training and CPD. Records should be kept by the PELh/NPRC to demonstrate support provided.

Not all Named Persons are employed directly by the establishment. In particular, many NVSs are employed through veterinary consultancy organisations, and responsibility for their professional CPD may rest primarily with their employer and professional regulator rather than the establishment itself. In such cases, the role of the PELh/NPRC is to ensure that these Named Persons are competent, appropriately supported, and able to fulfil their responsibilities effectively within the establishment.

7.2 Role of the Home Office

The Regulator plays a key role in setting the framework within which establishments operate and is therefore well-placed to help address cross-sector issues affecting Named Roles. While many of the solutions identified by respondents would need to be implemented locally, respondents consistently identified the Regulator as an important contributor to improving standards. As discussed above, this could be supported through more effective audit of the

assistance provided by the establishment to Named Persons, alongside greater scrutiny of how AWERBs support and review the effectiveness of Named Roles.

Requests for additional support from the Regulator were primarily related to aspects of a previous ASRU Change Programme, which were considered outside the scope of this report. A smaller number of responses sought further guidance to support veterinary activities and decision-making. As discussed in Section 4.ii., additional concerns relating to the NTCO and NIO roles largely reflected uncertainty regarding role definition. The ASC noted that role responsibilities are already described within existing guidance and therefore considered that greater visibility and endorsement of these resources may be more beneficial than the development of additional guidance. The ASC therefore suggested that the Regulator formally endorse the relevant LASA/LAVA/IAT guidance and signpost those seeking clarification on role responsibilities to these resources (LASA, LAVA and IAT, 2023).

These previously identified deficiencies in role-specific training should be addressed through the introduction of mandatory training for both NTCOs and NIOs.

Establishing formal training requirements would provide a more consistent approach to ensuring that individuals appointed to these roles understand their responsibilities and are equipped to fulfil them effectively. This would bring these roles into closer alignment with other Named Roles that already have mandatory role-specific training requirements. The absence of mandatory training for roles that indirectly contribute to animal welfare, competence, and implementation of the 3Rs may also inadvertently contribute to a perception that these roles are of lesser importance within establishments.

Another common theme related to NACWO engagement with PPL holders when raising welfare concerns or suggesting refinements to ongoing projects. Respondents indicated that these interactions were not always effective, which may reflect a lack of understanding of the NACWO role and its contribution to animal welfare. Including greater emphasis on communication and influence when working with PPL holders within role-specific training could help address this.

Recommendation 3: The Home Office should signal, through the training framework, the need for improved training, including:

- 1. Future development of a mandatory training module for both NTCOs and NIOs,**
- 2. Formalising endorsement of LASA, LAVA, and IAT Guiding Principles for Named Roles.**
- 3. The need for the inclusion of soft skills in Named Person mandatory training, such as management of rebuttals and conflict management.**

Following completion of mandatory training, there is an ongoing need for Named Persons to maintain current knowledge and competence within their respective areas of responsibility. For NACWOs and NVSs, this expectation is implied but not formally established within existing guidance, while no equivalent expectation exists for NIOs and NTCOs.

At present, the *Guidance on the Operation of ASPA* (Home Office, 2023) does not set specific ongoing CPD requirements for Named Roles beyond the expectations associated with initial training and competence. However, the requirement for Named Persons to

maintain current knowledge and expertise is implicit within the responsibilities of the roles. For example, guidance states that the IAT maintains a Register of Animal Technologists (RAnTech) whose qualifications and experience may make them suitable candidates for appointment as NACWOs. Although RAnTech status is not a requirement for the role, the register requires completion of 35 hours of CPD annually. Similarly, veterinary surgeons, including those acting as NVSS, are required by the Royal College of Veterinary Surgeons (RCVS) to complete and reflect on a minimum of 35 hours of CPD annually as a condition of maintaining their professional standards.

While these examples illustrate existing approaches to maintaining professional competence, they should not be interpreted as ASPA-specific requirements for Named Roles. Nevertheless, the ASPA guidance states that a NACWO should have “up-to-date knowledge and experience of relevant animal technology and a thorough knowledge of the husbandry and welfare needs of the species kept in the establishment”. Maintaining such knowledge and expertise requires ongoing learning and professional development.

Despite this, there is currently no requirement for ongoing professional development for Named Roles. This results in variable knowledge and competence between establishments. Formalising minimum CPD expectations for these Named Roles would help ensure a consistent standard of expertise and support effective role delivery, while responsibility for determining specific CPD expectations beyond this should sit with establishments.

Recommendation 4: The Regulator, with input from relevant professional bodies, should define minimum CPD expectations for Named Persons, including expectations for maintaining role-specific competence.

7.3 Role of the sector

The NC3Rs (2024) survey and our call for evidence both identified a need for additional resources to support NTCOs and NIOs, including case studies, newsletters, practical guidance, and opportunities for peer learning. The development and maintenance of these resources and support mechanisms are best led by the sector itself, drawing on the expertise of organisations that regularly contribute to this area.

8. Protected time and resource

8.1 Role of the Establishment Licence Holder

Through Standard Condition 15 (Table 2), the PELh/NPRC must ensure that Named Persons are provided with sufficient resources and capacity to fulfil their responsibilities under ASPA. Insufficient time and capacity were also identified within Challenge 3 of the RSPCA's Strengthening AWERBs report (RSPCA, 2025). The ASC considers that the time and resource requirements associated with Named Roles should be better understood and actively reviewed by PELhs/NPRCs to ensure that individuals are able to fulfil their responsibilities effectively. Establishments should therefore consider how capacity is allocated, monitored, and adjusted to reflect local needs, workload, and the requirements of each Named Role. This should be agreed in discussion with the Named Persons and their managers.

Recommendation 5: The PELh/NPRC should ensure that Named Persons are provided with adequate resources, including administrative and operational support where required, and sufficient protected time to fulfil their roles effectively.

9. Communication

9.1 Role of the Establishment Licence Holder

Through Standard Condition 21 (Table 2), the PELh/NPRC must be able to demonstrate adequate and effective provision for regular and effective liaison with and between Named People. Communication was identified as a recurring challenge within the survey responses, suggesting that establishments should review existing arrangements to ensure Named Persons can effectively fulfil their responsibilities.

Examples of good practice in communication identified by the Subgroup included the PELh/NPRC attending AWERB and Named Person meetings, holding periodic individual meetings to discuss support needs, prioritising communication from Named Persons, providing dedicated funding for training and CPD, and undertaking annual appraisals focused on Named Role responsibilities and performance.

While responsibility for supporting and overseeing Named Persons may be delegated within an establishment, the ASC considered that regular engagement between the PELh/NPRC and those named on the licence remained important. Direct meetings between the PELh/NPRC and Named Persons would provide a more effective mechanism for understanding support needs and ensuring that Named Persons are able to fulfil their responsibilities effectively.

Recommendation 6: The PELh/NPRC should hold regular Named Persons meetings to support coordination across roles, ensuring early identification of issues. Records should be kept by the PELh/NPRC to demonstrate support provided.

While information on Named Roles is included within mandatory licence training, respondents indicated that their roles were not always appropriately engaged, suggesting a need for ongoing training, communication, and reinforcement of the function and value of Named Roles at establishments. PPL holders, Personal Licence Holders (PIL holders), and other relevant staff should understand when advice should be sought from Named Persons and how that advice should inform decision-making. This may include induction and refresher training, local guidance, visible contact information, and regular communication to ensure that staff understand the roles, responsibilities, and expertise of Named Persons, and know when and how to seek their advice.

The PELh/NPRC should also support effective communication between PPL holders/applicants and Named Persons, consistent with the expectations set out in Standard Condition 21 (Table 2). Consideration could be given to delegating this function to the AWERB, for example through annual meetings or structured discussion sessions that bring together licence holders and Named Persons to strengthen collaboration across these roles.

Recommendation 7: The PELh/NPRC should implement and document mechanisms to support effective engagement between licence holders/applicants and Named Roles, and the AWERB should routinely review the effectiveness of these arrangements.

Communication and engagement requirements may differ between PIL holders and PPL holders/applicants, particularly in relation to when advice from Named Persons should be sought and the matters on which they should be consulted. While PIL holders may require procedural guidance during the conduct of licensed work, PPL holders/applicants have a key responsibility to engage with relevant Named Persons during the development and review of project proposals.

In particular, PPL holders/applicants should seek advice and consider guidance from Named People, scientists, and external 3Rs resources during the preparation of licence applications and throughout the lifetime of the project. Standard Condition 1 of the Personal Licence requires licence holders to act at all times in a manner that is consistent with the principles the 3Rs, while Standard Condition 4 of the Project Licence places a similar obligation on reduction and refinement. Given the role of Named Persons in providing specialist advice on the implementation of the 3Rs, meaningful engagement with these individuals is an important mechanism through which licence holders can meet these obligations. Advice from Named People, and the rationale for decisions not to follow advice from Named Persons, should be recorded proportionately, for example through existing mechanisms such as AWERB minutes, email correspondence, or comments captured within documents (e.g. PPL, Study Plan review). Evidence of effective engagement between licence holders and Named Persons throughout the lifecycle of licensed work could be included as part of Regulator audit.

Recommendation 8: Establishments, including PEL holders and AWERBs, should ensure that Named Persons' advice is appropriately considered and informs decision-making. Proportionate records of the advice from Named People should be available.

The role of the NIO is to support access to information, including signposting PPL holders/applicants to relevant resources and subject matter specialists. However, responsibility for identifying and considering suitable replacement opportunities rests primarily with the PPL applicants. Individuals developing licence applications should be able to demonstrate that they have undertaken a proportionate assessment of available replacement approaches relevant to their field of research. While the AWERB has an important role in reviewing proposals, consideration of replacement should begin well before formal AWERB review. This helps ensure that discussion at AWERB is focused on evaluating the replacement considerations made, rather than identifying opportunities for the first time. Named Persons' expertise should inform decision-making throughout the project lifecycle, helping to identify and consider opportunities to improve animal welfare and implement the 3Rs.

Recommendation 9: AWERBs and PPL applicants should ensure that NIOs, alongside other relevant Named Persons, are appropriately engaged in the development and conduct of licensed projects.

9.2 Role of AWERBs

Under Standard Condition 6.1 (Table 2), the PELh/NPRC is required to establish and maintain an AWERB, which has a statutory function to support Named Persons. While the majority of recommendations relating to AWERB effectiveness will be addressed within the separate commission on strengthening the functioning of AWERBs, the ASC considered it important to comment on the AWERB's role in addressing communication issues within establishments in this report.

Interaction with Named Persons should be framed as a positive ongoing process, and not just for raising concerns; these interactions help drive the continuous, iterative process of evolving practices that constitutes leading practice, which can often be lacking when Named Persons are ignored. However, some survey responses from NACWOs and NVSs identified difficulties in raising concerns and influencing PPL review and conduct of ongoing projects. As the body responsible for ethical review and oversight, the AWERB has an important role in providing appropriate routes for both reporting serious concerns and routine mechanisms for raising lower-level operational or welfare concerns.

Recommendation 10: AWERBs should establish and document mechanisms that ensure that Named Persons and other individuals can raise animal welfare concerns and challenge behaviours, processes, and procedures.

10. Conflicts of Interest

10.1 Role of the Establishment Licence Holder

An important aspect of effective governance is ensuring that actual or perceived conflicts of interest are recognised and appropriately managed. Importantly, ASPA guidance on conflicts of interests is stricter than employer codes may be, because it includes scientific interests as well as personal or financial interests. As Named Persons often hold multiple roles within an establishment, governance arrangements should ensure that independent advice and decision-making are maintained where conflicts may arise. ASPA states that conflicts of interest must be avoided, and there should be at least three people filling the five key roles of: PELh/NPRC, PPL holder, PIL holder, NACWO, and NVS. Conflicts within this context may include establishment financial interests, significant scientific or financial interests in the outcome of a programme of work, interests involving close relations or associates, and other relevant considerations. Conflicts of interest can arise when individuals hold multiple roles, such as an NVS also acting as a facility manager. A NACWO working on their own study would similarly present a conflict, although such situations are not always recognised. To support good governance, the ASC has set out examples of conflicts in Table 3. Conflict of interest registers could be included as part of Regulator audit.

Table 3: Examples of potential conflicts of interest and management approaches

COI	Management approach
NACWO is also the PIL on the study under discussion.	Another NACWO, or where appropriate the NVS, should lead and document the welfare discussion to ensure independent consideration of animal welfare issues.
NVS is also the Facility Manager.	Veterinary advice should be recorded separately from operational decisions and subject to independent review.
NTCO assessing the competence of a direct line report.	An independent assessor should be used wherever possible.
PELh is a major scientific stakeholder in the work being considered.	The interest should be declared, with independent input sought to ensure balanced decision-making.
NIO providing information relating to their own project.	Information and recommendations should be reviewed by another Named Person or suitably independent individual before decisions are made.

Recommendation 11: The PELh/NPRC should ensure that there are clear processes to manage and review conflicts of interest.

11. Governance and Compliance

11.1 Role of the Regulator

NACWOs and NVSs responding to the IAT's report on ASRU reforms (Goldie, 2024) identified the need to “ensure that a strong presence is maintained in establishments through appropriately frequent and regular audits, unannounced visits, and clear communication.”

A key role for the Regulator in relation to the recommendations within this report is to provide proportionate oversight and assurance, and to promote continuous improvement regarding their effective implementation. Regulatory inspections and audits offer an opportunity to assess whether establishments have put in place the systems and support structures necessary for Named Persons to function effectively. Areas that may warrant consideration during inspection include:

- Documented governance arrangements, including defined responsibilities, lines of accountability (i.e. reporting structures), and communication pathways for Named Persons.
- Evidence of training, CPD, and ongoing support for both technical and non-technical competencies required for effective role performance.
- Evidence of effective engagement between licence holders and Named Persons throughout the lifecycle of licensed work, including during licence development, conduct of studies, retrospective review/assessment, and other relevant decision-making processes.
- Processes for identifying and managing conflicts of interest, including the use of conflict-of-interest registers where appropriate.

Regulatory oversight with two-way dialogue in these areas can help promote consistency between establishments, reinforce accountability, and support the implementation of a culture of continuous improvement in animal welfare and the application of the 3Rs.

To support establishments during the implementation of regulatory changes, the Regulator could assist PELhs/NPRCs seeking additional support. Communications channels need to be active in order to provide an avenue for concerns to be raised. The Regulator should interact with establishments regularly and continue to circulate quarterly PELh operational newsletters.

12. References

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RSPCA (2023) *AWERB Training Survey Report*. Available at: [AWERB Training Survey Report](#) (Accessed: 22 September 2026).

13. Annexes

Annex A: ASC Membership

The individuals listed below were members of the ASC at the time this report was published.

Chair

Dr Sally Robinson*

Committee members

Dr Andrew Benest

Professor Jonathan Birch

Mrs Caroline Chadwick* (AWERB Subgroup Chair)

Dr Beth Clark*

Dr Juliet P. Dukes*

Dr Stuart Greenhill*

Dr David Grumett*

Dr Ilyena Hirskyj-Douglas

Professor Martin Knight

Mrs Tina O'Mahony* (AWERB Subgroup Co-Chair)

Professor Hazel Screen

Dr Dharaminder Singh*

Dr Carl Westmoreland

Dr Lucy Whitfield*

Professor Alastair Wilson

*Member of the ASC AWERB Subgroup

Annex B: Abbreviations

3Rs, Replacement, Reduction, and Refinement;
ASC, Animals in Science Committee;
ASPA, Animals (Scientific Procedures) Act 1986;
ASRU, Animals in Science Regulation Unit;
AWERB, Animal Welfare and Ethical Review Body;
COI, Conflict of Interest;
CPD, Continuous Professional Development;
IAT, Institute of Animal Technology;
LASA, Laboratory Animal Science Association;
LAVA, Laboratory Animal Veterinary Association;
NACWO, Named Animal Care and Welfare Officer;
NC3Rs, National Centre for the Replacement, Refinement, and Reduction of Animals in Research;
NIO, Named Information Officer;
NPRC, Named Person Responsible for Compliance;
NTCO, Named Training and Competency Officer;
NVS, Named Veterinary Surgeon;
PELh, Establishment Licence Holder;
PIL, Personal Licence;
PPL, Project Licence;
RAnTech, Register of Animal Technologists;
RCVS, Royal College of Veterinary Surgeons;
RSPCA, Royal Society for the Prevention of Cruelty to Animals. `

Annex C: Call for evidence: Survey questions

Named Persons (NPs) are crucial to the effective delivery of establishments' responsibilities under the Animals (Scientific Procedures) Act 1986 (ASPA).

The Animals in Science Committee (ASC) has been commissioned to [provide advice to the Minister on the Named Information Officer \(NIO\)](#) and [other NPs](#) to ensure that these roles function effectively at establishments.

To inform our work, the ASC's Animal Welfare Ethical Review Body (AWERB) Subgroup would be grateful if you could provide us with feedback to the following questions.

The answers provided in this document will not be shared with the Home Office and will be used solely to inform the ASC's advice. Responses will be anonymised before analysis.

Please return the completed document to asc.secretariat@homeoffice.gov.uk by **16 March 2026**.

Any information you can provide would be greatly appreciated, and please note that you do not have to answer all the questions below if they are not relevant to you.

Named Role information

1. What named role(s) do you hold?

☐ PELh / NPRC	☐ NACWO	☐ NVS	☐ NTCO	☐ NIO
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2. Do you have any other roles or key responsibilities in addition to this role? Please tick all that apply.

☐ No other roles	☐ Researcher	☐ Laboratory animal vet (but not NVS)	☐ Administrative role	☐ 3Rs Champion
☐ Animal facility manager/ director	☐ PPL holder	☐ PIL	☐ Home Office Liaison Contact	☐ Technical staff
☐ Other				

If other, please specify:

3. Is your named role covered by more than one individual at your establishment?

☐ Yes ☐ No

4. How much time do you spend cumulatively on your named role(s) each week, on average? Respond only to the roles you currently hold.

	PELh / NPRC	NACWO	NVS	NTCO	NIO
Full time (36+ hrs)	☐	☐	☐	☐	☐
Typically, three days a week (21–35 hrs)	☐	☐	☐	☐	☐
Typically, two days a week (11–20 hrs)	☐	☐	☐	☐	☐
Typically, one day a week (5–10 hrs)	☐	☐	☐	☐	☐
Less than one day a week (0–4 hrs)	☐	☐	☐	☐	☐
Other (please specify)					

Establishment Information

5. What type of establishment do you work at? Please select one option only.

☐ Academic ☐ Industry/
CRO ☐ Government-
funded
research unit ☐ Charity funded
establishments ☐ Other

☐ Prefer not
to answer

If other, please specify:

**6. Approximately how many PPL holders are there at your establishment?
Please select one option only.**

☐ <10 ☐ 10 to 50 ☐ 51 to 100 ☐ >100 ☐ Prefer not to answer

**7. Approximately how many PIL holders are there at your establishment?
Please select one option only.**

☐ <10 ☐ 10 to 50 ☐ 51 to 100 ☐ >100 ☐ Prefer not to answer

Training and support

8. What would you like your establishment to provide that would help you to deliver your role(s)? Respond only to the roles you currently hold.
Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

9. What further external support would be most useful for your role(s)?
Please select all that apply. Respond only to the roles you currently hold.
Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

10. Have you received any specific training for your role(s) (e.g. role-specific course from an external provider, in-house training on topics relevant to the role)? Respond only to the roles you currently hold.
Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

11. If you answered 'yes' to question 9 and you have received role-specific training, please summarise what this training was and how recently you undertook this training? Respond only to the roles you currently hold.
Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

Role definition

12. Describe briefly what you understand your role(s) to be about.

Respond only to the roles you currently hold.

Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

13. What do you think your role(s) should be about?

Please highlight any differences between the current reality and what you believe the role should involve

Respond only to the roles you currently hold.

Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

Success and challenges

14. What would you consider as your biggest success/highlight in your role(s)? Respond only to the roles you currently hold.

Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

15. What is the biggest challenge that you find in your role(s)?

Respond only to the roles you currently hold.

Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
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NACWO	
NVS	
NTCO	
NIO	

Closing comments

16. Do you have any final comments that you think would be helpful when considering your role(s) and what further support would be most beneficial? Including any suggestions for regulatory, structural, or training changes.

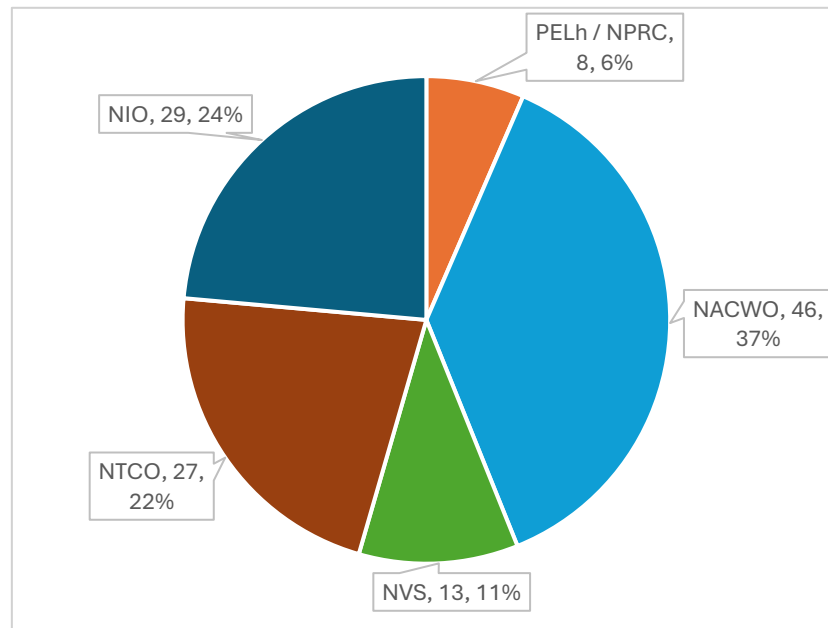
Respond only to the roles you currently hold.

Where information applies to multiple roles, please enter the same details in each corresponding box.

PELh / NPRC	
NACWO	
NVS	
NTCO	
NIO	

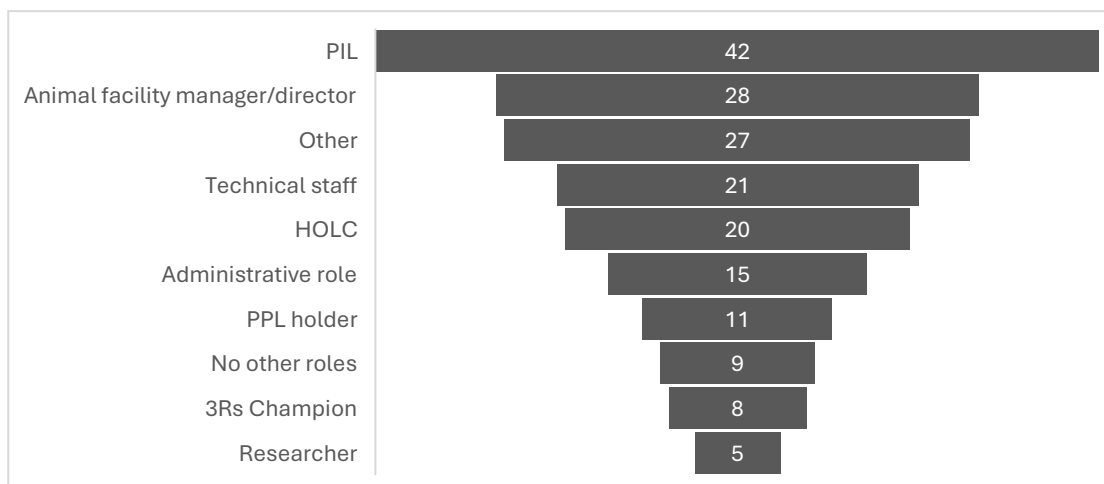
Annex D: Call for evidence: Quantitative results

What named role(s) do you hold?? (N = 99; multiple responses accepted)

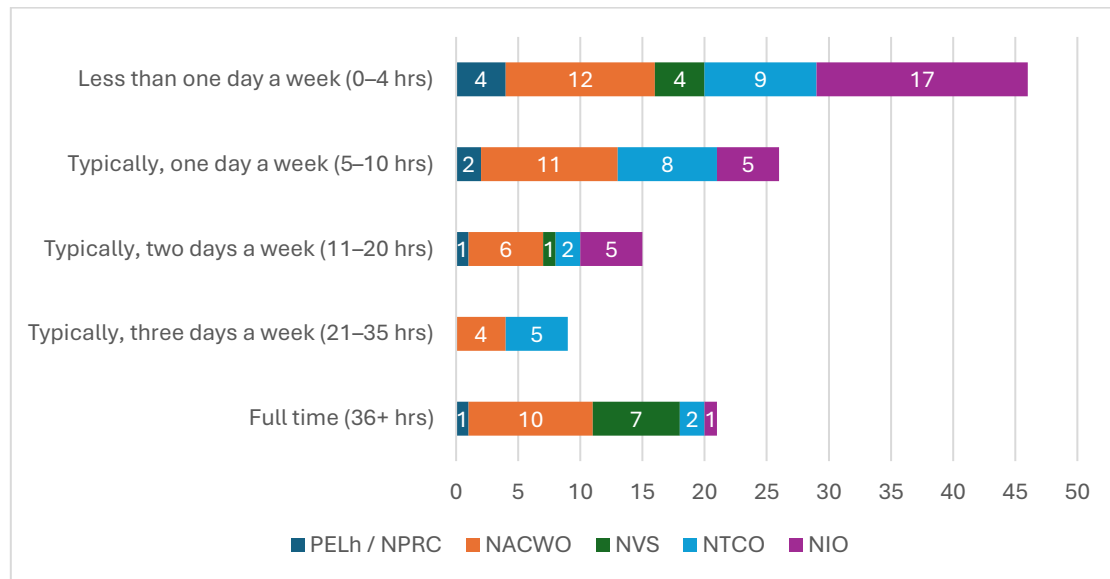


Do you have any other roles or key responsibilities in addition to this role?

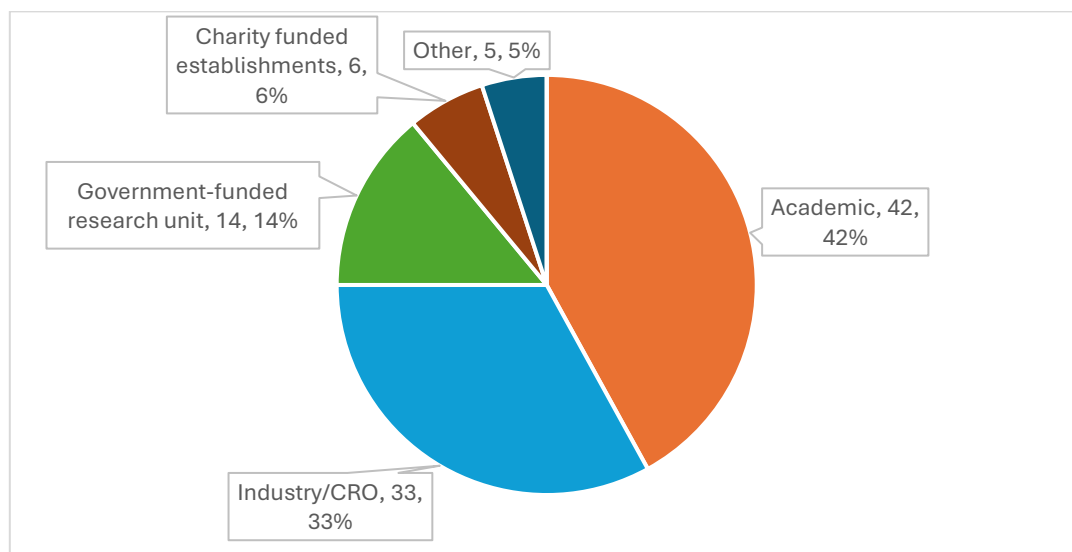
(N = 99; multiple responses accepted)



How much time do you spend cumulatively on your named role(s) each week, on average?
(N = 99)



What type of establishment do you work at? (N = 96)



Approximately how many PPL and PIL holders are there at your establishment?
(N = 98)

