

December 2025

The monthly summary of  
consultation matters by  
Consultation GuRU –

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# Consultation Catch-up

I've been arguing for a radical re-think on consultation for many years, and I'm now ready to publish my contribution to the debate. It's not the last word – just an analysis that I hope will be helpful. I'd like to persuade *consultors* and *consultees* to adopt a new terminology, distinguishing between **NAVIGATION** consultations and those that are about the **EXPLORATION** of possible solutions and options. More familiar to all of us are the decisions and choices conventionally consulted as **DETERMINATION** exercises, and, finally, the important dialogues that are needed as consultation on **IMPLEMENTATION**. These different functions call for different approaches, different timescales, methodologies and standards. My [Background paper](#) considers how almost 30 different methods are being used but I want to see less emphasis on the *form* a consultation takes and more on the *function* it performs.

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*Best of the Blogs*

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## THE FOUR FUNCTIONS FRAMEWORK ( Blog 115)



The Framework document discusses in detail the different characteristics of the various FUNCTIONS. They deserve study, for greater clarity should encourage better consultations. Major *consultors* and consultancies may find it useful to develop specific design templates for different functions and it is hoped that measurable standards will emerge for innovations like 'calls for evidence', drop-in sessions or community dialogue systems. In-house Briefings are planned for 2026 so that those interested can have a 'walk through' the document and associated papers.

## Would a formal pre-Budget Consultation have been better?

(Blog No 114)



Dear Rachel Reeves.

My Blog can help ensure that the pre-Budget shambles never happens again. I welcome greater transparency and an open debate on the many options you need to consider. But rather than allow a disorganised free-for-all as you try 'pitch-rolling' unpopular choices and reducing your MPs to nervous wrecks, THERE IS A BETTER WAY. Organise a proper pre-Budget consultation on the most likely options and let everyone contribute – not just the professional lobbyists and the commentariat. Why not stand up on 26th November, apologise for the unseemly confusion and announce that in future, Budgets will follow an effective public consultation?

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Click here to read  
the newsletter on  
the website

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## Third Heathrow runway prompts a typical Parliamentary response (Blog 113)



Ministers may be desperate to build the third runway in the good cause of economic growth. But anyone watching Heidi Alexander's cautious announcement in Parliament will have no illusions about the hurdles she'll have to overcome. There will be consultation on a new strategy ... except that perhaps there won't be. And local MPs will know that their constituents will be consulted ... except that by then, no-one will be listening. It will all be paid for by the private sector, and planes will be taxiing on the new runway by 2035. What can possibly go wrong?

**On Page 2** this month, I refer to current consultations on Immigration, football and local government, as well as high court cases affecting OfSTED inspections and the Palestine Action designation. The book review is of *'The Usual Channels'* by Sebastian Whale

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## Instant insights

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- It's frequently said that in our system, we often consult on less important issues whereas some of the biggest policy changes (eg Assisted Dying or some welfare reforms!) proceed without consultation. In part, this is because parties consider Manifesto promises immutable. But right now, because it goes beyond anything previously promised, we have a full-scale formal Government consultation on a matter of the highest political profile. This is **Shabanna Mahmood's consultation** on "[A fairer pathway to settlement](#)" – proposals to make it more difficult and take longer to settle in the UK and then become an UK citizen. It has already sparked intense controversy, with 300+ charities and voluntary organisations expressing outright opposition. Let's see what role the consultation plays in what will be a vigorous public debate.
- **The Headteachers Union** has failed to persuade the High Court to declare Ofsted's consultation on a replacement schools grading scheme unlawful. Its case was that the regulator had pre-determined the issue by consulting on a strongly *preferred option*. Mr Justice Saini firmly rejected this claim, but having read the [judgment](#), I'm rather less sure that the process was as sound as it might have been. Stand by for a closer look at this in a forthcoming GuRU Blog!
- The High Court is currently hearing a judicial review on the Government's decision to prescribe the campaign group **Palestine Action** under Terrorism legislation. One of the four grounds of challenge is the failure to consult – both the group itself, and more widely. It raises important constitutional and legal questions, including the concept of procedural fairness at common law. Whichever way the Court rules, the judgment will be worth studying.

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## Straws in the wind

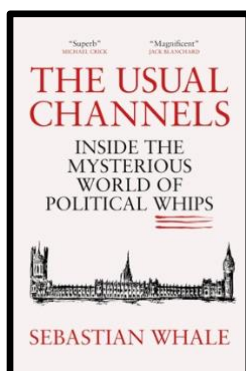
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- **Paul Smith** of the Strategic Land group has produced an [insightful article](#) of the growing use of AI in the planning consultation process. It is published in the magazine *Building Design* and is called "[AI could force us to re-imagine how public consultation in planning works](#)." It raises the spectre of thousands of AI generated *consultee* responses, and the implications. In my view, it will increasingly encourage Councils to revert to face-to-face dialogue methods for some cases.
- Emeritus [Professor Colin Copus](#), one of our most distinguished experts on local government, is getting very exercised by some of the current consultations on local government reform in England. The [Hampshire proposals](#) have recently been launched and he comments that ... "*telling people what is happening before you ask them what they think and telling them they are confused by the current system, isn't consultation; it's propaganda for a decision already made.*" Are we seeing a pattern here?
- The new **Independent Football Regulator** is consulting about key aspects of the forthcoming [Licensing Scheme](#). There are critical issues for Clubs, including whether or not there should be elections for supporters to agree who speaks on their behalf for the purposes of fan consultation etc. Kevin Rye of [Think Fan Engagement](#) and I are responding together on the detail ....

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## The Reading List

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Sebastian Whale has written a comprehensive [history of the Whips offices](#) in Parliament, breaking a long taboo that much of what happens there is meant to be confidential. As it happens, it looks as if everyone he's interviewed can't wait to spill the beans. In fact, too much so. For political nerds, it's all fascinating but could have been 100 pages shorter had the author not felt obliged to include at least a couple of anecdotes from all his informants– even if they added nothing to the narrative. Everyone denies having a 'little black book' and there is a lot of care and compassion on display. I have no grounds to disbelieve anything, so I'll stick to 'no comment' but like many political memoirs, it is at its best telling the inside story of events with which most of us are familiar. Brexit in particular comes across as a self-indulgent pantomime, so it probably makes this volume a very suitable seasonal gift.

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