

Acoustic design of schools: performance standards

Government consultation response

December 2014

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Introduction

The consultation on 'acoustic design of schools: performance standards' set out proposals to revise the Department for Education (DfE) standards which were introduced in 2003.

Consultation on changes to the standards published in 2003 started in 2010 with a series of focused consultations and a major workshop open to the public, funded by The Department for Communities and Local Government's (DCLG) Building Regulations Division. The changes from this semi-formal consultation process in 2010 were included in the draft that was the subject of the 2014 public consultation.

This 2014 public consultation was conducted online through the DfE and <u>GOV.UK</u> public consultation websites. In addition, a major public consultation event was organised by the Institute of Acoustics (IoA) during the consultation period where each of the consultation questions was discussed at length. A show of hands was taken by the IoA at this event and the results of this public conference were sent to DfE as the public consultation response from the IoA.

The aim of the acoustic performance standards is to provide acoustic conditions in schools that:

- facilitate clear communication of speech between teacher and student, and between students
- do not interfere with study activities

These standards provide the normal means of compliance with the acoustic Requirement E4 on acoustics in schools of Part E of the Building Regulations, and provide guidance in support of the acoustic requirement in The School Premises Regulations 2012 and The Independent Schools Standards 2013.

Summary of responses received and the government's response

A public consultation on the proposed revision of the acoustic standards for schools was completed on 16 May 2014.

In all there were 59 responses to the public consultation. The responses to each question broken down by correspondent type can be found at <u>annex A</u>.

Organisational breakdown of respondents	Number of respondents
Acousticians	23
Other	11
Manufacturers	6
Local authority/council	4
Unions	3
Architects/designers	3
Combined acoustics and building services consultancies	2
Disability/special educational needs specialists	2
Teachers	2
Building control bodies	2
Teacher of the deaf	1
Total	59

Table 1: organisational breakdown of respondents

The 'other' category above included responses from the key stakeholder organisations including:

- National Deaf Children's Society (NDCS)
- National Sensory Impairment Partnership (NatSIP)
- Royal National Institute of Blind People (RNIB)
- Vision Impairment, Education and Wellbeing (VIEW)
- Society of Electrical and Mechanical Engineers serving Local Government (SCEME)
- Society for Construction and Architecture in Local Authorities (SCALA)
- Royal Institute of British Architects (RIBA)

- Institute of Acoustics (IoA)
- British Association of Teachers of the Deaf (BATOD)
- British Association of Educational Audiologists (BAEA)

A full list of the organisations that responded is included at <u>annex B</u>.

Main findings from the consultation

The majority of respondents to the consultation welcomed the proposals and agreed with the principles presented.

The review committee comprised of leading acousticians has examined all the proposals that were included in the responses. Some important evidence was presented and this has led to minor but significant changes to the proposed standards. Details of these changes are summarised under each consultation question below.

Some responses suggested changes to Part E of the Building Regulations which was outside the scope of the consultation. These comments have been referred to Building Regulations Division at the Department for Communities and Local Government.

Question analysis

As some respondents may have offered a number of options for questions, total percentages listed under any one question may exceed 100%. Throughout this response, percentages are expressed as a measure of those answering each question, not as a measure of all respondents.

Question 1

Do you agree that the new standards adequately cover the requirements for refurbishment and change of use?

	Total	Percent
Yes	27	53%
No	17	33%
Not sure	7	14%

Table 2: consultation response data, question 1

Government response

Some respondents thought that the same standards should apply to both new and refurbished buildings. This was discussed by the review panel and it was agreed that a statement should be included in the new standards to encourage the use of higher standards and that the starting point for design should be to target new build standards where possible in refurbishment but that the minimum standards quoted should remain as the minimum requirements for Building Regulations approval.

Question 2a

Do you agree with the changes to indoor ambient noise level room types?

There were 49 responses to this question. 42 (86%) agreed with this change, 6 (12%) were against the change, and 1 (2%) were not sure.

	Total	Percent
Yes	42	86%
No	6	12%
Not sure	1	2%

Government response

This change has been adopted.

Question 2b

Do you agree with the change of unit of measurement of airborne sound insulation between spaces?

	Total	Percent
Yes	33	66%
No	11	22%
Not sure	6	12%

 Table 4: consultation response data, question 2b

Government response

There was a strong case made by leading acousticians for the retention of the existing units, but in a more easily understandable format. The new standards were considered by the acoustic review committee and consensus was reached amongst the acousticians on the retention of the existing unit but also allowing the use of weighted sound insulation D_w for on-site measurements. This was agreed to be a better option than had been proposed in the consultation. This will therefore be adopted in the final standards.

Question 2c

Do you agree with the change of design conditions for calculation of sound insulation of building envelope?

	Total	Percent
Yes	24	48%
No	13	26%
Not sure	13	26%

Table 5: consultation response data, question 2c

Government response

The responses from leading ventilation design experts and manufacturers pointed out that the design conditions for summertime and mid-season conditions proposed in the draft for consultation were both unrealistic. These have been revised to remove the wind effect from the mid-season weather condition and to relax the summertime criteria.

Building Bulletin 93 (BB93) 2003 allowed cross ventilation with external free field noise levels up to 49 dB(A). This aspect of the 2003 standards has resulted in some criticism since 2003, that the standards were too onerous. The effect of the public consultation draft standard was to relax façade insulation requirements so that external free field noise levels at the façade of up to 53 dB(A) would not require acoustic insulation of the building envelope. After further consultation with ventilation experts and acousticians and dynamic thermal modelling of the baseline design classroom solution we have revised the text for Section 2.1.3 further. The levels have now been modified to 51 dB(A) for single sided ventilation and 56 dB(A) for cross ventilation and roof ventilation.

In addition a further relaxation has been applied so that at peak summertime weather conditions and when boost ventilation under the local control of the teacher is required for practical activities involving dust, fumes and steam, it is permitted to open windows at the expense of higher noise levels. This means that many more urban and suburban school sites and the majority of school sites can be provided with natural or hybrid ventilation systems. This will provide better environmental conditions for users than mechanically ventilated and cooled buildings and will result in lower energy consumption and running costs.

Significant cost savings will result and far fewer schools will now require acoustic insulation than under the 2003 standards. Under the 2003 criteria only 10% of rural and suburban schools and 2% of urban schools could be ventilated using opening windows. This figure is now approximately 60% of rural and suburban schools and 25 % of urban schools. Furthermore the vast majority of schools can now be ventilated using hybrid or mixed mode systems.

A criterion has also been introduced post consultation to limit the noise from automatic actuators used on windows and ventilators and from ventilation dampers. In some cases poor design and specification of these actuators has led to significant failures. The new criterion should prevent this happening.

Question 2d

Do you agree with the dropping of 55 dB L_{A1} ?

	Total	Percent
Yes	35	73%
No	10	21%
Not sure	3	6%

 Table 6: consultation response data, question 2d

Government response

It was pointed out by acousticians that the consultation was correct that the L_{A1} criterion duplicated the 35 dB L_{Aeq} criterion when L_{Aeq} was 35 or 40 dB(A) but that at 45 dB(A) and higher the L_{A1} needed to be retained to protect children from aircraft noise. This has therefore been adopted in the final standards.

Question 2e

Do you agree with the change in standard for rain noise?

	Total	Percent
Yes	29	62%
No	10	21%
Not sure	8	17%

Table 7: consultation response data, question 2e

Government response

Question 3a

Do you agree with the changes to table 2 of airborne sound insulation values?

	Total	Percent
Yes	37	74%
No	7	14%
Not sure	6	12%

 Table 8: consultation response data, question 3a

Government response

This change has been adopted.

Question 3b

Do you agree with the adoption of lower standard for refurbishment for sound insulation between rooms?

	Total	Percent
Yes	30	63%
No	12	25%
Not sure	6	13%

 Table 9: consultation response data, question 3b

Government response

Question 3c

Do you agree with the change of unit of measurement of impact sound insulation between spaces?

	Total	Percent
Yes	30	60%
Νο	10	20%
Not sure	10	20%

Table 10: consultation response data, question 3c

Government response

This is the same issue as question 2b and the same resolution has been adopted whereby the original unit has been retained in a more accessible form and L_w has been allowed for on-site measurements.

Question 4a

Do you agree with the changes to composite R_w values instead of specification of individual elements of wall?

	Total	Percent
Yes	32	65%
No	9	18%
Not sure	8	16%

Table 11: consultation response data, question 4a

Government response

Question 4b

Do you agree with the changes to the reduction of standard for ventilation ducts between classrooms and corridors?

	Total	Percent
Yes	30	65%
Νο	12	18%
Not sure	7	16%

Table 12: consultation response data, question 4k

Government response

This change has been adopted.

Question 5

Do you think the change to the reverberation time in teaching spaces designed for students with special hearing or communication needs is reasonable?

	Total	Percent
Yes	33	67%
No	11	22%
Not sure	5	10%

Table 13: consultation response data, question 5

Government response

One respondent correctly pointed out an error in the table where T20 was quoted. This has been changed to T. Some respondents thought the RT of 0.6 seconds at the lowest frequencies was too onerous. This was discussed by the acoustic review committee and evidence was found that the criteria can be relatively easily achieved.

The change has been adopted. However, we have revised the text on special needs in section 0.4 to point out that the design of accommodation for pupils with special hearing, speech, language and communication needs often requires the use of alternative performance standards to suit the local approach to inclusion and the particular types of special needs.

The revised Building Bulletin also states that "the criteria given in the tables for spaces intended specifically for these pupils should be a starting point." and that "An acoustician should always decide, in consultation with the school and an audiologist where necessary, on a case by case basis, what the appropriate acoustic standards are; and should produce Alternative Performance Standards to suit the particular needs of the pupils and the intended use of the facilities. "

Question 6a

Do you think the Increase in reverberation time for sports halls from 1.5 to 2 seconds is reasonable?

	Total	Percent
Yes	24	47%
No	16	31%
Not sure	11	22%

Table 14: consultation response data, question 6a

Government response

A strong case was made that the lower RT of 1.5 seconds should be retained for smaller sports halls. This was discussed by the acoustics review committee and it was agreed to do this with an RT of 1.5 seconds for halls of up to $250m^2$; an RT of 2 seconds for halls of 594m² and above; and a sliding scale for RT for spaces between $250m^2$ and $594m^2$.

Question 6b

Do you agree with the change to make testing not recommended for sports halls with deemed to satisfy constructions?

	Total	Percent
Yes	27	51%
No	14	26%
Not sure	12	23%

Table 15: consultation response data, question 6b

Government response

Question 7a

Do you think the lower limit for APS set at refurbishment standard is reasonable?

	Total	Percent
Yes	39	75%
No	7	13%
Not sure	6	12%

Table 16: consultation response data, question 7a

Government response

This change has been adopted.

Question 7b

Do you agree the proposal that commonly applied APS that have proved successful should be included as permitted exceptions?

	Total	Percent
Yes	34	67%
No	13	25%
Not sure	4	8%

Table 17: consultation response data, question 7b

Government response

This change has been adopted.

Question 8a

Do you agree that STI calculations of the speech intelligibility in open plan spaces should be excluded from Building Regulations requirements but standards should be included in 'Acoustic Design of Schools' in support of the School Premises Regulations and the Independent School Standards?

	Total	Percent
Yes	32	64%
No	10	20%

	Total	Percent
Not sure	8	16%

Table 18: consultation response data, question 8a

Government response

A number of respondents were concerned that there would be little enforcement of the requirements if they are removed from the Building Regulations.

This was discussed by the acoustics review committee.

It was pointed out that the new acoustic standards include IANL and RT criteria for open plan teaching and break out areas that apply to open plan spaces. These criteria act as a safeguard against inadequate levels of acoustic absorption in open plan areas.

STI calculations enable more intelligent placing of absorption, diffusion and screening and design solutions in accordance with a specific activity plans compared to simple adherence to Building Regulation RT and IANL criteria.

We have referenced the risk matrix for open plan design and further guidance for schools and designers in 'Acoustics of schools: a design guide' to be published by the Association of Noise Consultants and the Institute of Acoustics in 2014. This will help design teams to advise their clients about open plan spaces.

We have also included a statement in the new standards that for moderate and high risk open plan arrangements it is essential to carry out STI modelling.

This change has been adopted with the addition of the further guidance described.

Question 8b

Do you agree with the inclusion of a second criterion in table 7 relating to the STI between groups of pupils?

	Total	Percent
Yes	28	60%
No	14	30%
Not sure	5	11%

Table 19: consultation response data, question 8b

Government response

Question 10

Is the guidance as short and concise as possible whilst being fit for purpose?

	Total	Percent
Yes	32	65%
No	11	22%
Not sure	6	12%

 Table 20: consultation response data, question 10

Government response

We have decided to go ahead with the publication as drafted subject only to minor changes.

Next steps

The new standards will be published on <u>GOV.UK</u> on 18 December 2014 and will come into effect immediately.

Annex A: analysis of response to consultation questions

1) Do you agree that the new standards adequately cover the requirements for refurbishment and change of use? If not please suggest changes/amendments with reasons

There	e were 51 re	esponses to	o this questi	ion.							
	School	College	HT/ teacher	Trade Union	Other government department	LA/ council	Building Control Body	University	Other	Т	otal
Yes	0	0	1	1	0	2	1	1	21	27	53%
No	0	0	0	1	0	2	1	0	13	17	33%
Not Sur e	0	0	0	0	0	0	0	0	7	7	14%

2a) C	2a) Changes to indoor ambient noise level room types													
There	There were 49 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ council	Building Control Body	University	Other	her Tota				
Yes	0	0	1	2	0	4	1	1	33	42	86%			
No	0	0	0	1	0	0	0	0	0	1	2%			
Not Sur e	0	0	0	0	0	0	1	0	5	6	12%			

2b) C	hange of	unit meas	urement of	airborne	sound insulation	between sp	aces							
There	There were 50 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal			
Yes	0	0	1	2	0	4	1	0	25	33	66%			
No	0	0	0	1	0	0	0	1	9	11	22%			
Not Sur e	0	0	0	0	0	0	1	0	5	6	12%			

2c) Change of design conditions for calculation of sound insulation of building envelope

There were 50 responses to this question.

mere	were 50 fe	esponses in	o this quest	011.							
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal
Yes	0	0	1	2	0	1	1	1	18	24	48%
No	0	0	0	1	0	2	0	0	10	13	26%
Not Sur e	0	0	0	0	0	1	1	0	11	13	26%

2d) D	Propping o	of 55 dB L₄	1										
There	There were 48 responses to this question.												
	School	College	HT/ Teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal		
Yes	0	0	1	3	0	3	1	1	26	35	73%		
No	0	0	0	0	0	1	0	0	2	3	6%		
Not Sur e	0	0	0	0	0	0	1	0	9	10	21%		

2e) Cl	2e) Change in standard for rain noise													
There	There were 47 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	T	otal			
Yes	0	0	1	1	0	3	1	1	22	29	62%			
No	0	0	0	1	0	0	0	0	7	8	17%			
Not Sure	0	0	0	1	0	1	1	0	7	10	21%			

3a) C	3a) Changes to Table 2 of airborne sound insulation values													
There	There were 50 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	T	otal			
Yes	0	0	1	2	0	4	1	1	28	37	74%			
No	0	0	0	1	0	0	0	0	6	7	14%			
Not Sur e	0	0	0	0	0	0	1	0	5	6	12%			

3b) Adoption of lower standard for refurbishment for sound insulation between rooms

There were 48 responses to this question.

THEIC		sponses to	uns quesu	011.							
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal
Yes	0	0	1	0	0	2	1	1	25	30	63%
No	0	0	0	3	0	2	0	0	7	12	25%
Not Sure	0	0	0	0	0	0	1	0	5	6	13%

3c) Cl	hange of u	unit measu	rement of	impact so	ound insulation b	etween spa	ces							
There	There were 50 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal			
Yes	0	0	1	1	0	4	1	0	23	30	60%			
No	0	0	0	0	0	0	0	1	9	10	20%			
Not Sure	0	0	0	1	0	0	1	0	8	10	20%			

4a) Cl	4a) Changes to composite R_w values instead of specification of individual elements of wall													
There	There were 49 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal			
Yes	0	0	0	2	0	2	1	1	26	32	65%			
No	0	0	0	1	0	2	0	0	5	8	16%			
Not Sure	0	0	1	0	0	0	1	0	7	9	18%			

4b) R	4b) Reduction of standard for ventilation ducts between classrooms and corridors													
There	There were 49 responses to this question.													
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal			
Yes	0	0	0	1	0	2	1	0	26	30	61%			
No	0	0	0	1	0	0	0	0	6	7	14%			
Not Sure	0	0	1	1	0	2	1	1	6	12	24%			

5 Do you think the change to the reverberation time in teaching spaces designed for students with special hearing or communication needs is reasonable? (If not please suggest changes/amendments with reasons.)

There	were 49 re	sponses to	this questi	on.							
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Т	otal
Yes	0	0	1	3	0	4	1	1	23	33	67%
No	0	0	0	0	0	0	0	0	5	5	10%
Not Sure	0	0	0	0	0	0	1	0	10	11	22%

6a) In	crease in	reverberat	ion time fo	or sports I	nalls from 1.5 to 2	2 seconds					
There	There were 53 responses to this question.										
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	T	otal
Yes	0	0	0	0	0	2	1	0	24	27	51%
No	0	0	0	2	0	1	0	1	10	14	26%
Not Sure	0	0	1	1	0	1	1	0	8	12	23

6b) Te	6b) Testing not recommended for sports halls with deemed to satisfy constructions										
There	There were 51 responses to this question.										
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Total	
Yes	0	0	0	0	0	2	2	1	19	24	47%
No	0	0	0	1	0	0	0	0	10	11	22%
Not Sure	0	0	1	2	0	2	0	0	11	16	31%

7a) Lo	7a) Lower limit for APS set at refurbishment standard										
There	There were 52 responses to this question.										
	School	College	HT/ teach er	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	Total	
Yes	0	0	0	2	0	4	2	1	30	39	75%
No	0	0	0	0	0	0	0	0	6	6	12%
Not Sure	0	0	1	0	0	0	0	0	6	7	13%

7b) Commonly applied APS that have proved successful included as permitted exceptions

There were 51 responses to this question.

mere	were of re	sponses to tr	lis question.								
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	То	otal
Yes	0	0	0	1	0	4	1	1	27	34	67 %
No	0	0	0	0	0	0	1	0	3	4	8%
Not Sure	0	0	1	1	0	0	0	0	11	13	25 %

8a) Do you agree that STI calculations of the Speech Intelligibility in open plan spaces should be excluded from Building Regulations requirements but standards should be included in "Acoustic Design of Schools" in support of the School Premises Regulations and the Independent School Standards? (If not please suggest changes/amendments with reasons.)

There were 50 responses to this question.

	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	То	tal
Yes	0	0	1	0	0	1	1	1	28	32	64 %
No	0	0	0	2	0	2	1	0	3	8	16 %
Not Sure	0	0	0	1	0	1	0	0	8	10	20 %

		e with the in changes/an			criterion in Table ons.)	7 relating t	o the STI be	tween groups	s of pupil	ls? (If r	not
There	were 47 re	sponses to tl	nis question.								
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	То	tal
Yes	0	0	1	2	0	2	2	1	20	28	60 %
No	0	0	0	0	0	0	0	0	5	5	11 %
Not Sure	0	0	0	1	0	2	0	0	11	14	30 %

10) ls	the guida	ance as sh	ort and con	cise as pos	ssible whilst beir	ng fit for pur	pose?				
There	were 49 r	esponses to	o this questio	n.							
	School	College	HT/ teacher	Trade Union	Other government department	LA/ Council	Building Control Body	University	Other	То	tal
Yes	0	0	1	1	0	3	1	1	25	32	65 %
No	0	0	0	0	0	0	0	0	6	6	12 %
Not Sur e	0	0	0	0	0	1	0	0	10	11	22 %

Annex B: list of organisations that responded to the consultation

Organisation	Ref no.
McCann, Dominic	4
24 Acoustics (Neil McLeod)	34
A.S.K. Acoustics Ltd (Alex Krasnic)	6
Anonymous	3
Apex Acoustics Ltd (Jack Harvie-Clark)	60
Arup Acoustics (Helen Butcher)	26
Association of School and College Leaders (Martin Ward)	32
BATOD and BAEA (Stuart Whyte)	54
Brooks, Rose (Babcock LDP)	8
Budd, Anne	48
Bureau Veritas (Nigel Burton)	49
Buro Happold (Matthew Harrison)	42
Cartwright, David (Independent Consultant)	1
Cilia, Joe (Association of Interior Specialists (AIS))	16
Clarke Saunders Associates (Daniel Saunders)	33
Cogger, Nigel	22
Cole Jarman (lan Yates)	35
Connole, Rosemarie (Consultant)	7
Drewery, John	19
Dunbavin, Philip (Philip Dunbavin Acoustics Ltd)	13
Edgington, Charles (recticel)	5
Edwards, Paul	17
Gilberts (Blackpool) Limited (Roy Jones)	20
GS Acoustics (James Patterson)	11
Hoare Lea Acoustics (Jo Edwards)	39
Hopper, LB (Max)	40
Hull, Adrian	2
Institute of Acoustics (Anne Budd)	50
Integrated Services for Learning, Hearing Impairment Team, Hertfordshire CC (Claire Hazrati)	28
LB Hammersmith and Fulham Sensory and Language Impairment Team (S Bower)	21

Organisation	Ref no.
London Borough of Hounslow (David Birch)	51
Manchester City Council Building Control Section (Wayne Timperley)	29
Middleton, Chris (Acoustic Design Technology)	27
Monk, Peter	36
NASUWT (Chris Keates)	45
National Deaf Children's Society (NDCS) (Ian Noon)	55
National Sensory Impairment Partnership (NatSIP) (Lindsey Rousseau)	56
Newling, Hamish (Styles & Wood Ltd)	10
NHBC Building Control Services Ltd. (Diane Marshall)	23
Nightingale, Tom (Cundall)	12
Pires, Gustavo	31
RNIB and VIEW (Julie Jennings)	52
Robust Details Limited (Simon Bloodworth)	30
Rockfon (Tim Spencer)	47
Rockwool Limited (William Ray)	46
Royal Institute of British Architects (RIBA) (Anne Dye)	44
Saint-Gobain (Gareth Lewis)	41
Society for Construction and Architecture in Local Authorities (Mukund Patel)	14
Shield, Bridget	43
Society of Electrical and Mechanical Engineers serving local government (SCEME) (Alan Knibb)	57
Somerset County Council (Mike Highfield)	53
SRL Technical Services Ltd (Craig Barson)	15
Stevenson, Gavin (Building Design Partnership)	38
Taylor, A (Capita Property and Infrastructure)	37
Voice the Union for Education Professionals (Martin Hodge)	18
WBM (Rachel Canham)	59
WindowMaster (Jannick Roth)	58
Wright, Nigel (Wright Class Solutions Limited)	9
WSP (Emma Greenland)	24

Table 21: list of organisations that responded to the consultation



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