AFIS
ASSOCIATION FOR FAMILIES OF INDEPENDENT SCHOOLING™

AFIS EVIDENCE ANALYSIS

The case for an independent review of the evidence underpinning the 2025 independent schooling tax reforms

Briefing note | September 2026

THE ASK: AN INDEPENDENT POST-IMPLEMENTATION EVIDENCE REVIEW

AFIS is asking for the evidence, assumptions, modelling and forecasts underpinning the 2025 tax reforms affecting independent schooling to be independently tested against evidence since implementation.

Why now?

- The reforms are no longer prospective. Evidence is now emerging on pupil numbers, school responses, closures, family behaviour, state-sector movement and capacity, fees, and public-finance effects.
- The pre-implementation modelling made specific, testable assumptions and forecasts. A serious post-implementation process should therefore compare forecast mechanisms and outcomes with observed evidence rather than simply restating the original assessment.
- HMRC's Tax Information and Impact Note said the VAT measure would be "kept under review" through communication with affected taxpayer groups and stakeholders. The public interest question is what is being reviewed, against which metrics, by whom, and when findings will be published.

A timely parliamentary question

On 7 September 2026 the Treasury answered a written question asking whether any post-implementation assessment had taken place on the VAT and business-rates changes. The answer referred to the original Tax Information and Impact Note and to a later re-costing of expected revenue. It did not identify a wider post-implementation assessment comparing the original behavioural, education and public-cost assumptions with actual outcomes.

Key distinction: Re-costing expected tax receipts is not the same exercise as evaluating whether the policy's causal assumptions, behavioural pathways, education effects and wider public-resource implications were accurately modelled.

What should an independent review test?

QUESTION FROM THE ORIGINAL MODELLING	WHAT AN INDEPENDENT REVIEW SHOULD ESTABLISH
£7,690 state-school funding figure	What was, and was not, included in the £7,690 average funding figure used to illustrate the cost of additional pupils entering state schools, and was it the appropriate cost concept for the policy question?
20% VAT → ~10% average fee increase	How did a 20% VAT charge become an expected average fee increase of around 10%? Test the assumptions about VAT recovery, absorption, efficiencies, service reductions and fee pass-through against actual school responses.
37,000 fewer private pupils / 35,000 more state pupils	What assumptions and behavioural pathways sit behind these forecasts? Compare them with observed pupil movements, including state schooling, other independent schools, home education and overseas pathways, and establish whether the modelling distinguished privately funded pupils from pupils whose independent-school places were already publicly funded.
5–16 funding measure / A-level transition	Why was a funding measure for pupils aged 5–16 used when the behavioural analysis also anticipated movement at A-level transition? Test post-16 movement, capacity and public-resource consequences separately.
Cumulative effects	Was the cumulative impact of VAT and removal of charitable business-rates relief modelled adequately, alongside concurrent cost pressures? Children, families and schools did not experience

	these policies one Treasury spreadsheet at a time.

WHAT AFIS IS — AND IS NOT — CLAIMING

Evidence-led, not conclusion-led

- AFIS is not asking an independent reviewer to begin from the premise that the reforms failed.
- AFIS is not claiming that every fall in independent-school pupil numbers, every closure or every pressure on state provision was caused by tax changes.
- AFIS is not treating every cost outside a particular Government modelling boundary as an additional fiscal cost of the policy.
- AFIS is asking whether the published evidence base was sufficiently complete, whether the modelling assumptions were reasonable, and how forecasts compare with outcomes now that they can be tested.

Why independence matters

The same departments that designed, defended and implemented a policy can and should monitor it. But where a policy is politically contested, affects children and families, interacts with public-service capacity, and rests on behavioural forecasting, an independent review can add credibility for all sides. It can validate assumptions that performed well, identify those that did not, separate policy effects from demographics and other factors, and improve future appraisal and evaluation.

Questions for Government / Parliament

- What formal post-implementation evaluation framework exists for the VAT and business-rates reforms, beyond revenue re-costing and routine monitoring?
- Which original forecasts and behavioural assumptions are being tested against observed outcomes?
- Which departments and agencies hold responsibility for assembling the cross-government evidence, including Treasury/HMRC, DfE and devolved administrations?
- Will Government publish the methodology, metrics, evidence and results of its review, and on what timetable?
- Would Government commission or support an independent review so that contested questions of attribution and impact can be assessed transparently?

The principle

More than eighteen months after implementation, the original assumptions and forecasts can now begin to be tested against emerging evidence. A review is not a rerun of the political argument. It is a normal test of whether a significant public policy did what its evidence base said it would do, at the costs and through the mechanisms originally anticipated. Support for an independent review need not depend on whether one supported or opposed the policies themselves. The evidence should withstand scrutiny.

About AFIS

The Association for Families of Independent Schooling (AFIS) C.I.C. is a parent-led, non-profit and apolitical organisation. AFIS champions parental choice in education and advocates for fairer representation of independent schooling families. Its analysis examines published Government material, official statistics, Freedom of Information disclosures and emerging post-implementation evidence.

Key current sources

• HMRC, Private school fees — VAT measure, monitoring and evaluation section (updated 15 Nov 2024).
• UK Parliament, Written Question 20396, Sir James Cleverly, answered by HM Treasury on 7 Sep 2026.
• House of Lords Library, Independent schools: VAT and business rates (10 Sep 2026), briefing for the 17 Sep Lords debate.
• House of Commons Library, VAT on private school fees (26 Jun 2026).
• AFIS Case for Evidence Review and associated Accounting Boundaries / State School Resource Ledger.

READ THE FULL ANALYSIS
This briefing summarises AFIS's analysis of the published evidence underpinning the 2025 independent school tax reforms. The full analysis, supporting technical reports and source material can be accessed here:
AFIS Analysis: Tax reforms re independent schooling

AFIS is calling for a credible independent evidence review to test the original assumptions and forecasts against emerging post-implementation evidence.

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