

Q1. We want children, young people and their families to be involved in making better, evidence-based decisions about SEND, both in their local area and across the country.

How can we make sure children, young people and their families have a genuine say in these decisions?

To inform this response, HPCI engaged with 188 parent carers. Many told us that they feel unable to participate safely or confidently due to fear, exhaustion, trauma, language barriers, or their own neurodivergence. Families also reported that trust has broken down between parents, schools and the wider system, and that this must be addressed for participation to be meaningful.

Ensuring a genuine say requires:

- Structured, consistent, and meaningful mechanisms for involvement
- Accessible formats for all, especially seldom heard groups
- Sharing the evidence on which decisions are made and being clear about who is responsible for those decisions
- Approaches that do not rely on families needing to challenge schools or local authorities
- Trauma informed practice
- Proactive outreach and meeting families where they are

At the strategic level

- Co-production must be a non-negotiable requirement, with clear expectations that plans cannot be approved without PCF involvement.
- Monitoring mechanisms should track whether co-production and family engagement is happening, with escalation routes where it is absent.

Q2. How can we make sure that high-quality evidence and best practice inform decisions about SEND? Please share examples.

- Make use of the evidence base that already exists.
- Commission high quality research where there are gaps
- Training for all school staff should be grounded in evidence-based approaches.
- Transparent dissemination of guidance to schools, SENCOs and families is essential to prevent misinformation.
- National Inclusion Standards should provide clear, evidence-based guidance on identification, intervention, monitoring and adapting support and reasonable adjustments.
- The Expert Panel developing these standards must include representation of the collective lived experience, along with research, and practitioner expertise to define best practice.
- Local SEND reform plans should be required to demonstrate how they use evidence and data to identify gaps and plan improvements.

Q3. How can we ensure that children are best supported by the Universal offer?

The families we talked to welcomed investment in teacher training, but highlighted concerns about workforce capacity, inconsistent practice between settings (and sometimes classrooms), and poor communication across the system.

To strengthen the Universal offer requires:

- Upskilling all staff through the national training programme, ensuring consistent understanding of SEND, trauma, reasonable adjustments, and early identification.
- Clear national expectations through the National Inclusion Standards, ensuring consistency of SEND provision across schools and local areas.
- Proper accountability for settings and staff that are not delivering (Ofsted inspections are too infrequent to be sufficient by themselves).
- Improved communication between schools, families, health and local authorities, addressing the widespread parental concerns about poor information flow.
- A focus on inclusion and wellbeing, recognising that many children struggle and that behaviour may be caused by unmet needs.
- Inclusion being integral to all aspects of the school experience.
- There must be sufficient staffing and SENCO capacity.
- Adequate funding.

Q4. How can we ensure that children in the Targeted layer, are best supported?

We consider that each element below is needed for this layer to operate effectively.

- ISPs are genuinely co-produced and enforceable.
- Support is timely and effective. This means that staff need to be properly trained to understand how to identify need and its cause(s), so that interventions delivered are effective.
- There is sufficient staff capacity and expertise to proactively prepare and update ISPs and deliver this additional support without parents having to “fight”.
- Funding is sufficient and transparent, so families understand how Inclusive Mainstream Funding is being used.
- National standards with clear accountability which include examples of reasonable adjustments appropriate for each age group.
- Reasonable adjustments are consistently applied.

Again, without strong accountability, targeted support may be inconsistent or insufficient. There must be clear standards, oversight, resources and training.

Q5. How can we ensure that children in the Targeted Plus layer, are best supported?

Families' concerns:

- Workforce shortages, particularly in speech and language therapy, educational psychology, and mental health support
- Inequitable access - fears that schools that “shout loudest” or have the “right contacts” may receive more support
- Long waiting lists, which currently prevent timely intervention
- Inconsistent provision across the county, contributing to the postcode lottery.
- The lack of legal right to enforce the delivery of the ISP
- The inherent needs of some, that will prevent them accessing mainstream due to the size or environment of the setting (despite all measures to make them inclusive) and their eligibility for an EHCP

To ensure effective support:

- ISPs must be legally enforceable
- Experts at Hand must be adequately resourced, with clear criteria for access and transparent allocation across all age groups
- Inclusion Bases must be high-quality, with clear monitoring and oversight
- Local SEND reform plans must map workforce gaps and plans to address these
- Government must also put in place plans and resources to tackle workforce shortages at the national level
- Workforce impact must also be considered regarding special school staffing – there is a risk that staff will move to work in inclusion bases etc., leaving specialist settings struggling to meet their own pupil needs and deliver the level of outreach set out in the proposals
- PCFs must be involved in planning the Experts at Hand model, ensuring support commissioned reflects lived experience

Q6. How can we ensure that children in the Specialist layer are best supported?

Families are concerned about workforce shortages, long waiting lists, inconsistent access to specialist settings, the clarity of thresholds for SPPs, as well as their prescriptive nature. The term “complex needs” needs to be clearly defined, and it is difficult to respond to this consultation without this. There are also concerns about whether those children with less visible or widely understood needs might get overlooked. Families emphasised that specialist support must be consistent, timely, and enforceable, with clear accountability mechanisms.

To ensure strong support there needs to be:

- Retention of all existing tribunal rights, which families view as essential safeguards.
- Proactively managed processes so parents no longer have to fight for support.
- A personalised approach to understanding need and a flexible approach to support.
- Adequate specialist workforce, including EPs, SLTs, OTs, and mental health professionals, as well as education staff in settings to ensure that EHCPs and ISPs are planned and delivered
- Transparent access routes for all, including the proposed fast-track for under-5s and those at risk of inpatient admission.
- Robust oversight and accountability, including Ofsted monitoring of specialist settings and new standards for independent special schools.
- Co-production with families, ensuring that placements reflect lived experience and individual needs.
- More local settings.
- Fair travel support.

Q7. How do you think early years settings, schools, and college can best support the mental health and wellbeing of children and young people?

Families shared their concerns about gaps in mental health provision, long waits, a lack of integration with SEND support, systemic pressures that contribute to distress (e.g. focus on attainment, attendance and school rules over wellbeing and what is right for the individual), and punitive behaviour policies.

To support mental health effectively:

- Wellbeing at the whole-school and individual level should be integral to the school experience.
- Mental health support must be timely and accessible.
- Provide training for all staff on trauma-informed practice, emotional regulation, and understanding behaviour as communication.
- Strengthen early identification.
- Improve communication between education, health, and families.
- Families must be included in the support – to ensure the support considers the whole family, and to allow for consistency of language and approach.
- Maintain high standards but ensure reasonable adjustments to behaviour policies.
- Improved and consistent access to Mental Health Support Teams, is welcomed, but interventions need to be tailored, SEND-friendly and trauma informed.
- High quality, evidence-based support for those for whom school is a cause of trauma
- Consider whether Experts at Hand should include mental health professionals.
- Reform the curriculum to ensure it is flexible and more inclusive.

Q8. Do you agree that the refreshed ‘areas of development’ will support educators to understand and address barriers to learning and participation? Please explain your answer.

Partially.

Families welcomed the intention to provide clearer guidance, but raised concerns about:

- Inconsistent understanding of SEND across settings, which cannot be solved by refreshed areas alone.
- Workforce capacity, which limits the ability of staff to apply new frameworks effectively.
- The risk of oversimplification, particularly for children with complex or overlapping needs.

For the refreshed areas to be effective:

- They must be embedded within national training.
- They must be accompanied by clear, comprehensive, practical examples of reasonable adjustments.

Frameworks alone are not enough — implementation, training, and accountability are essential.

Q9. What arrangements would best support effective joint working between early years providers, Best Start Family Hubs, health, local authorities, and parents for children with SEND in the early years?

Families highlighted the need for clear communication, shared responsibility, and early identification. Current challenges include fragmented services, missing pathways, inconsistent expectations across EY settings, and lack of clarity about roles.

Effective joint working requires:

- A single, shared pathway for early identification and support, reducing duplication and delays.
- Clear expectations for co-production, with PCFs involved in shaping local early years pathways.
- Consistent information sharing between early years providers, Best Start Family Hubs, health, local authorities, and parents.
- Proactive support for families to help them understand and navigate the system.
- Enforcing the legal duties that already exist.
- Joint training across sectors, ensuring early years staff, health visitors, and Family Hub practitioners share a common understanding of SEND.
- Workforce mapping, identifying gaps in early years specialist provision.
- National standards and accountability for early years providers to ensure inclusivity.

Joint working must be structured, consistent, and co-produced, not reliant on individual relationships.

Q10. How can the early years foundation stage (EYFS) two-year old progress check and the Healthy Child Programme development review be improved so that children's needs are identified and supported more quickly? Please share examples.

- A shared assessment framework, ensuring both checks use consistent language and expectations.
- Joint training for early years practitioners and health visitors, ensuring both understand SEND indicators and reasonable adjustments
- Clear referral pathways, so concerns identified lead to prompt specialist assessment and support.
- Stronger communication with parents, addressing concerns about families feeling unheard or dismissed.
- Support for families to navigate through the system – for example via a Care Co-ordinator role.

Early identification must be proactive, timely, consistent, and supported by specialist input, not dependent on parental persistence.

Q11. What should the top three priority areas be for building and sharing evidence within the National Inclusion Standards?

1. Evidence-based identification

- Robust, evidence-based tools for identifying needs and/or barriers to learning at any age

2. Evidence-based intervention

- Comprehensive guidance on reasonable adjustments.
- Intervention frameworks that are practical and consistent.
- Clear roles, responsibilities and accountabilities
- Robust processes
- Oversight and continuous improvement

3. Effective inclusion and behaviour support

Families have significant concerns about behaviour policies acting as barriers to inclusion, particularly in secondary schools. Evidence is needed on:

- inclusive behaviour approaches
- trauma-informed practice
- alternatives to punitive systems
- proactive and reactive approaches
- preventative approaches to support needs and prevent escalation
- how a reformed curriculum can support improved inclusion

These priorities reflect the strongest themes raised by parent carers: consistency and inclusion.

Q12. What are the most important issues for national training to cover, to help support children and young people with SEND?

1. Understanding SEND and early identification

Staff need consistent training on:

- recognising early signs of need
- understanding:
 - a range of SEN, including SpLD, SLCD, and neurodiversity, including masking
 - trauma
 - fluctuating and regressive conditions
- using evidence-based tools

2. Reasonable adjustments and inclusive practice

Training should include:

- Identification of needs in and outside the classroom
- Flexible options
- Comprehensive practical examples
- adaptations for curriculum and assessment inclusive behaviour approaches
- adaptations for extracurricular activities and all aspects of school life

3. Working with families and co-production

Training must include:

- communication skills
- working collaboratively with parents
- valuing lived experience
- ensuring pupil voice

4. Mental health and emotional wellbeing

Families highlighted gaps in mental health support and the need for:

- trauma-informed practice
- understanding behaviour as communication
- supporting anxiety and school avoidance

5. Using ISPs effectively

Training must ensure staff understand:

- how to co-produce ISPs
- how to record provision clearly
- how to review and adapt support
- how to implement provision in the ISPs
- how to monitor progress and adapt
- how to utilize experts at hand

6. Understanding legal duties

National training must be ongoing, practical, consistent, and mandatory, not optional or dependent on local interpretation. Staff should know their roles and responsibilities and where accountability lies.

Q13. What practical actions can help teachers, educators and leaders manage workload whilst implementing these changes?

Practical actions include:

1. A standardised digital ISP system

This should:

- auto-populate key information
- reduce duplication
- support efficient reviews and transfers
- be accessible to parents

be accessible to all relevant staff

2. Timely access to Experts at Hand / specialist advice

This will:

- reduce time spent by SENCOs seeking external support
- improve confidence in decision-making
- reduce repeated referrals
- more effective interventions

3. Adequate staffing and workforce expansion

SENCOs and teachers are already overstretched. Families repeatedly raised concerns about workforce shortages. Without additional capacity, workload will remain unsustainable.

Workload reduction must be built into the design of reforms, not left to individual schools to manage.

Families raised concerns about leaders, teaching staff and SENCOs having to manage even more paperwork under the proposed changes in addition to dealing with complaints.

4. Retaining the SEND Tribunal's current remit, ensuring settings have a statutory duty to deliver provision in an ISP and removing the need for parents to complain to schools.

This will avoid pushing complaints onto already overstretched schools and will remove risk of increasing adversarial relationships between parents and schools.

Q14. How should the Special Educational Needs Coordinator (SENCO) role evolve to better meet the needs of children and young people with SEND?

Families recognise the importance of SENCOs but are concerned about capacity, consistency, and the need for stronger SEND leadership.

The SENCO role should evolve to include:

1. Strategic leadership

SENCOs should have:

- protected time and sufficient resources
- senior leadership status
- responsibility and accountability for embedding National Inclusion Standards

2. Oversight of ISPs

SENCOs should ensure:

- ISPs are co-produced
- provision is delivered
- reviews are timely and meaningful

3. Coordination with Experts at Hand

SENCOs should act as the link between:

- schools
- specialist professionals
- families

4. Training and coaching

SENCOs should support whole-school practice by:

- modelling inclusive approaches
- supporting reasonable adjustments
- ensuring consistent implementation

SENCOs should also have access to ongoing specialist training and supervision

5. Strengthened accountability

Families raised concerns about inconsistent practice and lack of oversight. SENCOs should be part of:

- school complaints panels
- monitoring of consistent inclusive practices across the setting
- quality assurance of ISPs and their delivery

Q15. What would provide assurance for families that an Individual Support Plan (ISP) is high-quality and contains the essential information?

Families expressed significant concerns about the reliability of school staff identifying and fully understanding the special education needs of individuals (particularly those without an EHCP) and the enforceability, quality, and consistency of ISPs. To build trust, ISPs must be:

1. Co-produced with families

Families must be involved in:

- identifying needs
- agreeing outcomes
- shaping provision

2. Clear, specific and measurable.

ISPs must specify:

- what support will be delivered
- who will deliver it
- how often
- how progress will be monitored

3. Aligned with evidence-based interventions

Families want assurance that support is:

- based on research
- not dependent on individual staff preferences

4. Reviewed regularly and adapted

ISPs must be:

- flexible
- responsive to changing needs
- reviewed at least termly not annually as proposed

5. Subject to oversight

Families emphasised the need for:

- Ofsted review of ISPs
- clear accountability when provision is not delivered – families do not think that accountability via the school's complaints process is sufficient, nor impartial (even taking into account the independent SEND role), and that complaints will lead to adversarial relationships with families making life even more challenging for both parents and staff.

Q16. How can we ensure Individual Support Plans are clear, concise and practical for professionals to use?

Families emphasised that ISPs will only work if they are usable, consistent, and genuinely reflective of a child's specific needs. They cannot become administrative exercises rather than meaningful tools.

To ensure ISPs are clear and practical:

1. A national digital template should include:

- structured sections for needs, provision, outcomes, and reasonable adjustments
- drop-down menus for common evidence-based reasonable adjustments and interventions
- auto-population of key information to reduce workload
- free text fields to ensure ISPs include individualized support when drop-down menu options are incomplete

2. Clear national guidance

Settings need:

- examples of high-quality ISPs
- guidance on writing specific, measurable provision
- clarity on what must be included
- comprehensive examples of reasonable adjustments

3. Co-production with families

ISPs must reflect lived experience and be developed collaboratively. Families must not be excluded from decision-making.

4. Regular, flexible reviews

ISPs should be updated as needs change and should be reviewed on a minimum termly basis.

5. SENCO oversight

SENCOs should quality-assure ISPs and ensure they are implemented consistently.

6. Time and training

Staff will need sufficient time and training to ensure that the plans are completed meaningful and delivered effectively.

Q17. How can we best support transition for young people with SEND, so that they are well supported into post-16 provision and further education, training or employment?

Families have told us about significant gaps in post-16 and post-18 support, including transport, benefits, education and employment opportunities and alignment across systems.

To support effective transitions:

1. Early planning

Transition planning should begin well before Year 11, with:

- accurate identification of need
- clear pathways
- involvement of careers advisers
- joint meetings with post-16 providers

2. Clear information for families

Families need accessible guidance on:

- available pathways
- specialist and mainstream options
- transport and financial support

3. Stronger cross-system coordination

The gaps between education, health, adult social care, and DWP must be addressed to avoid young people falling through the cracks.

4. Flexible curriculum pathways

Transition must include:

- educational opportunities
- vocational options
- supported internships
- life-skills pathways
- routes into work

There needs to be sufficient funding for each area to develop a range of post-16 and post-18 options that meet the wide range of needs of young people with SEND.

Q18. How can we make sure that every area can meet the full range of the needs of children and young people through Inclusion Bases?

In discussion about Inclusion Bases families raised concerns about workforce, inconsistent quality, unclear access criteria, and a danger of Inclusion Bases being under-resourced holding spaces rather than high quality educational settings that reflect true inclusion. One parent reported her child's concern that she was going to be "put back in the stupid room".

To ensure Inclusion Bases meet all needs there must be:

1. National standards
2. Sufficient oversight
3. Adequate trained teaching and support staff
4. Access to Experts at Hand
5. Clear access criteria
6. Co-production with families / the PCF
7. Sufficient capital investment
8. A broader curriculum

Parents raised concerns about how realistic it is that every area can meet the full range of the needs of children and young people through Inclusion Bases.

Parents also raised concerns that despite measures to improve inclusivity in mainstream the size of these settings will make them inaccessible to some, and parents fear that children will be forced into a traumatic environment and / or not granted an EHCP.

Q19. How can we make sure that Inclusion Bases help children and young people succeed in mainstream settings?

Bases must support inclusion, not keeping children with SEND apart from the rest of the school.

To ensure success:

1. Provide access to an appropriate curriculum

Inclusion Bases must combine:

- access to mainstream lessons where appropriate
- Adapted curriculum where appropriate
- bespoke teaching
- specialist support
- flexibility

2. Clear purpose and expectations

Bases should not be used for behaviour management. National standards must ensure:

- bases are for SEND support and teaching
- not for exclusion or isolation

3. Strong links with Experts at Hand

Inclusion Bases should be part of a wider system, with:

- specialist advice
- outreach from special schools
- multi-disciplinary input

4. Suitable environment.

Bases should provide a safe and calm setting with a range of appropriate sensory and emotional support for those children and young people who may find the main school environment overwhelming.

5. Co-produced support plans

ISPs should clearly describe how Inclusion Base support links to mainstream provision.

6. Monitoring outcomes

Ofsted's inclusion judgement and data tracking should monitor:

- progress and outcomes
- attendance
- reintegration into mainstream (where appropriate)
- parental satisfaction
- pupil satisfaction
- exclusions
- part-time timetables

Q20. Through the Experts at Hand offer, we want to ensure that mainstream settings can get quick specialist support for children and young people. What arrangements are needed between local area partners (education, health, social care) to deliver this Experts at Hand offer effectively?

Effective delivery requires:

1. Clear multi-agency governance

Local partners must agree:

- referral pathways
- response times
- roles and responsibilities
- accountability

2. Workforce mapping and expansion

Local SEND reform plans must:

- identify gaps
- plan recruitment
- ensure equitable distribution

(Government must also address the specialist workforce shortages at the national level.)

3. Transparent access criteria

Criteria must be:

- published
- consistent
- monitored

4. Joint training and shared language

Education, health, and social care must share:

- common terminology
- consistent expectations
- joint training opportunities

5. Parent involvement

Families must be part of decisions about when and how specialist input is used but should not have to fight for this support.

Q21. What needs to be in place so that children and young people with low incidence, highly complex needs can always access the right specialist placement?

1. Clear eligibility definitions, which should be transparent, consistent and co-produced with families
2. Sufficient specialist places. Families with low incidence and highly complex needs often have highly stressed lives and there needs to be locally available provision across all phases.
3. The right workforce capacity, professionals who are able to provide the right support to these children and families.
4. The proposed fast-track for under-5s and those at risk of inpatient admission must be well-communicated, consistently applied and monitored for equity.
5. Bespoke provision, where needed, to properly meet the individual needs of the child. There is concern that the Specialist Provision Packages may not have the flex to meet the needs of this group.
6. Retention of existing tribunal rights. Families have told us that they view tribunal access as essential to securing appropriate specialist placements.
7. Co-production with families. Families must be involved in decisions about placement suitability.

Q22. How can Specialist Provision Packages be designed to effectively support the main types of need we currently recognise?

While consistent support is helpful in addressing concerns about a “postcode lottery of support” the families we represent have raised concerns about the risk of over-standardisation and loss of personalised, needs-led support.

To design effective packages:

1. Use evidence-based interventions

Packages must reflect:

- research
- clinical guidance
- best practice from specialist settings

2. Ensure flexibility

Families emphasised that children may sit across multiple packages. Packages must allow:

- blended support
- personalised adjustments
- responsiveness to fluctuating, regressive or less visible needs

3. Co-produce with lived experience

Families stressed the importance of:

- parent carer voice
- young people’s voice
- wide ranging lived experience representation on the expert panel

4. Align with ISPs

Packages should set the high-level provision, while ISPs capture:

- day-to-day support
- reasonable adjustments
- specific strategies

5. Ensure clarity and transparency

Families need clear information about:

- what each package includes
- how decisions are made
- how to challenge decisions

Q23. We propose that EHCPs will guarantee educational provision set out in a Specialist Provision Package, with day-to-day provision captured in Individual Support Plans.

What is needed to make these proposals work effectively?

The families we represent are really worried about enforceability and the interaction between EHCPs and ISPs. Where the delivery of support is moved from an EHCP to an ISP that is not legally enforceable, families are concerned that the rights of their children are being eroded. They are also worried about moving from an EHCP to an ISP after reassessment at a point of transition between phases, as these can be particularly difficult for CYP with SEND.

To make the proposals work:

1. Strong accountability

Families raised concerns about:

- unclear redress routes for ISPs
- reliance on school complaints processes
- a negative impact on family and school relationships
- lack of independent oversight
- lack of impartiality
- the proposed changes to the SEND Tribunal role

Accountability must include:

- Ofsted review of ISPs
- Impartial and binding decisions in complaints
- clear escalation routes

2. Workforce capacity

Specialist provision cannot be delivered without appropriate resourcing of:

- therapists
- psychologists
- specialist teachers, including teachers of the deaf
- support staff

3. Clear communication

Families are confused about ISPs and EHCPs. National guidance must be:

- clear
- accessible
- consistently disseminated

4. Co-production

Families must be involved in both EHCP and ISP development, but the system should not rely on parents to drive action.

Q24. We propose creating a more direct route to Specialist Provision Packages and EHCP assessments for children under 5 with complex needs. How can we make sure this works in practice?

The fast-track route sounds positive but families report that early years support is currently fragmented and inconsistent.

To ensure the fast-track works:

1. Clear eligibility criteria

Criteria must be:

- transparent
- nationally consistent
- communicated to early years providers, health visitors and families

2. Joint working between early years and health

Early identification requires:

- information sharing
- shared pathways
- joint assessments

3. Workforce capacity

Fast-tracking is only meaningful if:

- assessments can be completed quickly
- specialist provision is available
- children can access personalised support that meets their individual needs
- all early years settings receive support (including PVIs)

4. Parent involvement

Families must be part of:

- decision-making
- assessment
- planning
- but should not be required to drive action

5. Monitoring and oversight

Local areas must track:

- waiting times
- outcomes
- equity of access

Q25. What would you expect to be considered as part of the needs assessment, for example evidence and expert or professional input?

A robust needs assessment should include:

1. Multi-disciplinary professional input

Including:

- educational psychology
- speech and language therapy
- occupational therapy
- mental health professionals

Families who cannot afford private reports should not be disadvantaged.

Where private reports are available and produced by registered professionals these should not require duplication to access appropriate support

2. Evidence from settings

Such as:

- observations
- progress data
- reasonable adjustments already tried
- ISP reviews

3. Parent and young person voice

Lived experience is essential to understanding need and assessments should include the views and feelings of the child or young person and their family.

4. Health information

Including:

- developmental history
- medical reports
- Healthy Child Programme assessments

5. Early years assessments

Including:

- EYFS progress check
- Family Hub input
- early intervention records

6. Consideration of fluctuating needs

Families emphasised that needs change over time and assessments must reflect this.

Q26. What factors should LAs take into account in proposing to parents and young people a list of potential settings to name on a plan?

Placement options must be transparent, needs-led, and co-produced, not driven by local capacity or financial pressures.

Local authorities should consider:

1. The child's needs above all else.

Placement must align with:

- the child's assessed needs
- the support required for safety, wellbeing, and progress

There needs to be independent oversight of this process to protect the most vulnerable children and young people

2. Expertise and capacity of the setting

Potential settings must have:

- trained staff
- access to specialists
- appropriate environment and resources

3. Reasonable adjustments and inclusion culture

LAs must consider:

- whether the setting can implement reasonable adjustments
- whether inclusion is embedded in the setting's ethos and practice

4. Proximity and travel

Long travel times can impact:

- attendance
- wellbeing
- family life

However, proximity should not take precedence over need. Where travel is required, this should be fairly provided for (including post 16 transport).

5. Parent and young person preference

Families emphasised the importance of meaningful involvement of both the parent carer but also the child or young person in placement decisions.

6. Availability of specialist support

Settings must have access to:

- Experts at Hand
- Inclusion Bases
- multi-disciplinary teams

Families have been clear in their feedback that there needs to be a meaningful route to challenge when offered unsuitable placements. Requiring the LA to reconsider is not sufficient.

Q27. What information and support do parents need to make a decision about which setting will be best for their child?

Parents need:

1. Clear, accessible information about each setting

Including:

- expertise and specialist staff
- curriculum adaptations
- inclusion policies
- reasonable adjustments offered
- access to therapies and support
- the physical environment
- educational options
- extra-curricular options
- pastoral support
- values and culture

2. Transparent information about Specialist Provision Packages

Families need to understand:

- what each package includes
- how it is delivered in different settings

3. Opportunities to visit settings

Parents need:

- tours
- meetings with SENCOs
- opportunities to ask questions

There are schools in our county that currently will not let parents visit unless they have already named the setting as their preference. This is unfair and does not allow for informed decision making.

4. Independent advice and support

This might include:

- strengthened SENDIASS
- peer support
- information that meets the needs of the individual family

5. Clear communication from the LA

Including:

- how decisions are made
- how to challenge decisions
- timelines and next steps

Q28. What do you think is the right maximum length of time for a temporary placement in Alternative Provision (AP) schools? Please explain your rationale.

Families are worried about AP being used inappropriately or for extended periods without clear plans for reintegration.

A maximum of 12 weeks may be appropriate in most cases, but the maximum length of time should be determined by the child's individual needs (with clear oversight in these exceptional cases). There also should be:

1. A clear reintegration plan

Temporary placements must include:

- goals
- timelines
- support for returning to mainstream

2. AP being used for support, not exclusion

Families have raised concerns about behaviour policies and exclusionary practices. AP must not become:

- a holding place
- a behaviour management tool
- a long-term placement by default

3. Specialist input available

AP must have access to:

- Experts at Hand
- mental health support
- specialist teachers

4. Regular review

Progress should be reviewed:

- every 4–6 weeks
- with parents involved
- with clear decision-making

Q29. We have set out our plans to regulate Independent Special Schools (ISS) sector.

Do you agree that these proposed changes will lead to suitable placements being available at a fair cost? Please explain why.

There isn't sufficient information to be able to answer this question.

These measures could improve quality and oversight, and reduce unreasonable costs.

However, there also needs to be a consideration of:

1. Capacity shortages

While local specialist places remain insufficient, demand for ISS will continue, limiting the impact of price regulation.

2. Workforce shortages

Even with regulation, ISS cannot meet need without:

- therapists
- psychologists
- specialist teachers

3. Risk of reduced choice

If price bands are too restrictive, families may lose access to specialist provision that meets their child's needs.

Q30. How should settings be held accountable for how they spend their Inclusive Mainstream funding?

1. Transparent reporting

Schools should publish:

- how Inclusive Mainstream Funding is spent
- what interventions it funds
- how impact is measured

2. Co-production with families

Parents should be involved in:

- reviewing provision
- understanding what support is funded
- raising concerns when provision is not delivered

3. Ofsted oversight

The new inclusion judgement should consider:

- use of funding
- quality of ISPs
- delivery of reasonable adjustments
- outcomes

4. Other oversight

Ofsted inspections are not frequent enough. There needs to be:

- more frequent and robust independent review of accountability
- a systemic approach – while parents should be involved in co-production, it should not solely be the responsibility of families to challenge decisions

5. Clear consequences

There needs to be:

- escalation routes
- intervention where funding is misused

Q31. Do you agree that more SEND funding should sit directly within mainstream budgets? Please explain why.

Yes, but with conditions.

Reasons to support more funding in mainstream budgets:

- Mainstream schools need consistent, predictable funding to deliver early intervention and reasonable adjustments.
- The notional SEN budget falls far short of the level needed.
- Increased funding could reduce the need for families to go through the EHCP process by strengthening the Universal and Targeted layers.

However:

- The current SEN notional budget is not ringfenced. Without strong accountability, funding may not be used for SEND support.
- Families tell us that schools are often not able to tell them how funding is used and report inconsistent practice between schools.
- Workforce shortages mean that even with funding, schools may struggle to deliver support.

Conditions needed for this proposal to work:

- Ringfenced funding.
- Adequate funding - proposed funding is not sufficient
- Transparent reporting on how funding is spent.
- Ofsted oversight through the inclusion judgement.
- Additional oversight.
- SENCO leadership in budget planning.
- Co-production with families on priorities.

Q32. In relation to pooled funding, we propose that every school becomes part of a local SEND group.

Do you agree that this proposal aligns with our aim for all schools to be part of high quality, community-based trusts?

In part.

Potential benefits:

- Shared expertise and resources across schools.
- Consistent approaches to inclusion and reasonable adjustments.
- Opportunities for joint training and peer support.
- Sharing best practices and alignment of standards.
- Stronger local planning aligned with local SEND reform plans.

Concerns:

- Pooled arrangements may make it more difficult for families to understand decision making processes and be able to raise concerns.
- Groups may become gatekeepers.
- Without national standards, groups may create a postcode lottery

Conditions needed for success:

- Clear accountability, including but not limited to, Ofsted inspection.
- Transparent decision-making and funding allocation.
- Clear routes for families to raise queries and concerns and fair and transparent handling of complaints.

Q33. How should disagreements about membership, provision, or funding in groups of schools for SEND be resolved?

1. Clear national guidance

With:

- defined roles, responsibilities and accountability
- clear expectations for collaboration
- transparent criteria for membership and funding
- transparent routes for queries and complaints

2. Independent mediation

Disputes between schools should involve:

- independent SEND specialists
- neutral mediation
- clear escalation routes

3. Oversight

Where disputes impact provision:

- LAs should intervene early
- DfE should step in where systemic failure occurs

4. Co-production with families

PCFs should be involved in:

- shaping local partnership arrangements
- monitoring how disagreements are resolved

5. Transparent reporting

Schools should publish:

- how decisions were made
- how funding is allocated
- how disagreements were resolved

Q34. How can we ensure the most effective use of these local partnership groups?

1. Clear purpose and scope

Groups must have:

- defined responsibilities
- measurable outcomes
- a clear strategic vision

2. Data-driven decision-making

Groups should use:

- local needs analysis
- workforce mapping
- lived experience feedback

3. Transparent governance

Groups should publish:

- membership
- key decisions made
- data on outcomes and impact

4. Mandatory co-production

PCFs must be:

- equal partners
- involved from the start
- able to escalate concerns

These groups must add value and demonstrably improve outcomes for children and young people. They must not be an additional layer of bureaucracy.

Q35. Which stakeholders are important for the success of local partnership groups, and why?

1. Parent Carer Forums (PCFs) because:

- lived experience is essential
- co-production is a legal requirement which leads to improved services
- PCFs provide insight into system impact

2. Schools and MATs (all phases, mainstream and specialist) because:

- they deliver day-to-day provision
- they hold Inclusive Mainstream Funding
- they shape inclusion culture

3. Local authorities because:

- they oversee strategic planning
- they hold statutory responsibilities
- they coordinate multi-agency work

4. Health partners

- providers
- commissioners
- specialist practitioners, as needed

Because health input is essential for holistic support for the child.

5. Social care because:

- many children have overlapping needs
- transitions require coordinated planning

6. Post-16 providers because:

- transitions are a major pressure point
- curriculum flexibility is essential
- there needs to be a clear and accessible offer for post-16 and post-18

7. Family Hubs and early years providers because:

- early identification is critical
- early years support is currently fragmented
- transitions are a major pressure point

8. SENDIASS and independent support organisations because:

- families need impartial advice
- they provide another method of including the family experience in decision making

9. Local school improvement bodies because they provide direction and support to settings

10. Ofsted and CQC because it provides:

- Independent oversight
- a national overview and
- Ensures high standards and lawful practices

Q36. How can we build stronger collaboration and a culture of improvement through local SEND strategic plans?

1. Make co-production non-negotiable

PCFs and families must be part of local strategic planning and decision-making, with intervention and redress where this isn't happening.

2. Use lived experience as core evidence

Lived experience (from children, young people and their families) must shape:

- priorities
- decision-making
- evaluation of impact

3. Improve communication

Strategic plans must be transparent for families and include:

- clear communication pathways
- regular updates
- accessible information

4. Monitor progress using data and lived experience

Plans should be reviewed annually using:

- outcomes data
- workforce data
- family feedback

5. Improve trust

- Actions should be visible to service users and improve experiences and outcomes
- Partners should be accountable

6. Sufficient funding to build capacity for collaboration.

Q37. What information, advice and guidance can best support children, young people and their families to ensure greater fairness across the system?

1. Clear communication about reforms

We are concerned about:

- rushed timelines
- unclear proposals or terminology
- gaps in the consultation (e.g., EOTAS, children missing education)
- decisions being made without proper consultation

2. Clear, accessible guidance on ISPs and EHCPs

National guidance must:

- explain the relationship between ISPs and EHCPs
- clarify legal entitlements at every level of support
- outline redress routes at every level of support

3. Transparent information about local provision

Families need:

- information about local provision and support
- who can access it and how to access
- clear pathways to support (AI could be used to take families through these)
- Expected timelines

4. Strengthened SENDIASS and independent support

- independent supporters
- peer support
- expanded SENDIASS capacity

5. Practical guidance on reasonable adjustments

Families need examples of:

- inclusive behaviour approaches
- curriculum adaptations
- sensory and communication support
- reasonable adjustments

6. Accessible information in multiple formats

Including:

- written guides
- videos
- webinars
- easy-read versions
- alternative languages

Fairness means that support must be delivered by a system that is truly accountable for its collective responsibility to children and young people.

The support a child receives should not be dependent on the capacity of the parent to either fight for their child's needs to be met or to have the resources to pay for advice or support.

Q38. Do you agree that a SEND specialist (e.g. a SENCO) should sit on the school complaint panel, when the complaint relates to SEND support and provision? Please explain why.

Yes but this won't be sufficient in and of itself.

Current complaints processes are often:

- adversarial
- inconsistently managed
- lacking SEND expertise
- unable to address power imbalances
- biased (e.g. lack independence)

A SEND specialist on the panel should:

- Ensure informed decision-making
- Improve fairness
- Strengthen accountability

However, we are concerned that another school's SENCO may not be sufficiently independent to ensure fairness in complaint investigation. There are also concerns about SENCO capacity to take on this role alongside their other responsibilities.

Families have also shared significant concerns about:

- willingness to complain to the school. Being seen as a "difficult parent" may impact on how staff view your child
- damaging relations with the school and moving from a partnership to an adversarial relationship
- parent capacity
- governor capacity and expertise
- The complexity of the complaints process putting pressure on families
- Differing perspectives (e.g. on paper a process may have been followed but the experience may not have felt inclusive).

Q39. This consultation outlines a series of measures intended to reform the SEND system. Some of these measures have already been finalised, and this is clearly indicated within the document.

With this in mind, is there anything further you would like to contribute to help inform the remaining proposals that are still under consideration

Families raised several cross-cutting concerns that must be addressed for the reforms to succeed.

1. Trust must be rebuilt

Families repeatedly described:

- adversarial relationships
- feeling unheard
- emotional and physical impact of “the fight”

Reforms must prioritise culture change, not only structural change.

2. Accountability must be strengthened

Families expressed deep concern about the proposed changes including:

- unclear roles, responsibilities and accountability
- unenforceable ISPs
- reliance on complaints processes
- weakening of the SEND Tribunal’s role
- design of SSPs and the move away from an individual needs led assessment
- the strength of the justification for wholesale changes to EHCPs
- the reduction in children and young people’s legal rights

Accountability must be:

- clear
- independent
- enforceable

3. Co-production must be consistent and a requirement, not an aspiration.

4. Workforce shortages are a huge barrier

- educational psychologists
- speech and language therapists
- occupational therapists
- mental health professionals
- teaching staff
- support staff

Without addressing this, reforms cannot deliver.

5. EOTAS and post-16 gaps must be addressed

6. There must be explicit consideration to groups who may be disproportionately affected:

- Care-experienced children
- Children with trauma backgrounds
- Children with less visible or well understood or fluctuating conditions
- Seldom heard families, e.g. those with English as a second language or their own additional needs etc