

Parentsactive Response to the SEND Reform Consultation

Parent Carer Forum for Hammersmith & Fulham

Introduction

This report sets out the views and experiences shared with Parentsactive in response to the Government's SEND Reform Consultation. Parentsactive is the Parent Carer Forum for Hammersmith & Fulham.

To support engagement with the consultation, Parentsactive held two parent sessions to help families understand the reform proposals and share feedback. One session included participation from the Local Authority, Educational Psychology Service and SENDIAS service. Parents were also invited to contribute through a survey, as well as having their opinions recorded verbally during sessions.

Across all engagement activity, parents consistently shared that they feel extremely anxious about the proposed reforms. While many welcomed the recognition that the current SEND system is not working consistently for children and families, there were significant concerns about the consultation, accountability, implementation, legal protections, and whether schools and services will have the capacity and funding required to deliver and maintain the proposed changes effectively.

Parents shared that they are hopeful about:

- Earlier intervention and access to specialist support with faster and more consistent access to specialists including Educational Psychologists, Speech and Language Therapists and Occupational Therapists
- Improved mainstream inclusion ethos through national standards and whole school approach to SEND training
- More consistency across local areas
- Standardised and accessible digital EHCPs

However, parents were also concerned about:

- A "one size fits all" approach
- Potential loss of legal protections and enforceability
- Reduced access to specialist placements
- Schools lacking capacity, staffing and funding to deliver and maintain reforms effectively and increased pressure on already stretched teachers and support staff
- Accountability and routes for challenge or redress becoming weaker and embedded within the school system and not independent of it. Schools becoming both provider and gatekeeper of provision without sufficient independent oversight

- Concerns that inclusion may become financially driven rather than needs-led
- Lack of clarity around implementation of Individual Support Plans (ISPs) and Specialist Provision Packages
- Lack of detail on Post-16 support and transition into adulthood

Parents welcomed proposals focused on earlier intervention, improved mainstream inclusion, better staff training and greater recognition of mental health, belonging and neurodiversity within education settings. Many were hopeful about increased consistency across local areas, improved access to specialist support and the introduction of standardised digital EHCPs.

A strong theme throughout parent feedback was the need for earlier intervention, faster access to specialist support and better coordination between services. Families want a more responsive system with improved access to therapies, Educational Psychologists, Speech and Language Therapists and Occupational Therapists, alongside clearer communication and joined up working between schools, local authorities and health services. Parents also highlighted the importance of support for the whole family and improved pathways into post-16 education, employment and adulthood support.

However, parents also expressed significant concerns that the reforms weaken existing protections and reduce access to specialist provision. Families are worried about a potential “one size fits all” approach, lack of clarity around Individual Support Plans and Specialist Provision Packages, and the risk that inclusion could become financially driven rather than needs led. Parents also questioned whether schools, already under significant pressure, would have the staffing, training and resources necessary to deliver and, importantly maintain, these reforms successfully. A recurring concern throughout the feedback was trust and accountability. Parents described fears that schools could become both provider and gatekeeper of support without sufficient independent oversight, while routes for challenge and redress look weaker.

Families stressed the importance of maintaining strong legal protections and ensuring that reforms lead to meaningful improvements in children’s experiences and outcomes, rather than simply shifting responsibility and weakening rights within an already stretched system.

Consultation Responses

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?

- Listening to feedback on all SEND reforms, ensuring that no decisions on fundamental aspects of change are made in advance, so that consultation is genuine and meaningful
- Regular reviews and meetings with schools
- Co-production through Parent Carer Forums, including additional funding for forums
- Allowing families to contribute to all aspects of consultation and decision-making
- Retaining legal entitlements and protections
- Local youth panels and councils
- Accessible formats including community languages, Easy Read, multiple media formats and in-person events

It is important to recognise that with the announcement that fundamental decisions on the SEND reforms have been made without consultation (this includes changes to tribunal powers, an amended threshold to access an EHCP needs assessment, the legal duty for Local Authorities to develop the content and ensure delivery of provision in an EHCP and the use of predetermined Specialist Provision Packages), has already contributed to a breakdown in trust with families and an ebbing away in confidence of the proposed new system.

All too often, the issue is not whether families have the opportunity to be heard, but whether their views are genuinely listened to and given appropriate weight in decision-making. Children, young people and families should be involved through meaningful, ongoing co-production rather than one-off consultations or tick-box exercises, with engagement taking place from the outset rather than after key decisions have already been made.

Regular review meetings with schools and services should take place, alongside stronger engagement through Parent Carer Forums, supported by additional funding so forums can participate consistently and effectively. Families should continue to retain legal entitlements and protections, as these help ensure their voices are heard. Local youth panels and councils could help ensure young people contribute directly to decision-making. Engagement must also be accessible through Easy Read materials, translated resources, multiple communication formats and in-person opportunities.

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

- A national call for evidence
- Creation of an independent evidence-based body to oversee best practice, with parent and young people representation
- Mandating the use of evidence within local plans, including referencing sources for recommendations

- Long-term oversight of SEND spending linked to needs-based interventions and provision
- Peer review between local areas and school clusters
- Stronger links between practitioners and researchers
- Greater transparency through publication of detailed data
- Evidence should include lived experience from children, young people and families, not solely academic or quantitative data
- Local areas should demonstrate how family feedback has shaped decisions, not simply that engagement activity took place
- Evidence should include what happens on the ground for families and the impact. Including – tribunals, delays in therapy delivery, the short term and long term impact of children out of school on children/ young people and their families, the gap between specified provision and what is delivered

High quality evidence should include both academic research and the lived experience of children, young people and families. Local areas should be required to demonstrate how feedback from families has shaped decisions, not simply that consultation activity has taken place.

There should be a national call for evidence and the creation of an independent body to oversee and share best practice, which includes young people in the system and parents. Local SEND plans should reference evidence and explain how recommendations are informed by research and outcomes. Stronger links between schools, practitioners and researchers would also improve practice, alongside peer review between local areas and school clusters. Transparency is important, including publication of detailed SEND data and long-term oversight of spending linked to needs-based interventions. On-the-ground evidence provides a clear picture of the realities faced by many families within the SEND landscape and highlights the significant gap between what is the envisaged structure and process of support and what is actually experienced on the ground.

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

- Whole school SEND training for all staff, including administrative and lunchtime staff. Practical, applicable training rather than theoretical awareness only.
- Accessible routes for parents to raise concerns
- Smaller class sizes
- Sensory-friendly spaces
- Structured breaktimes and alternative break spaces
- Facilitated inclusion activities and learning about neurodiversity, such as the LEANS programme from the University of Edinburgh

- Understanding and delivery of sensory circuits where needed
- Alternative routes to access education through vocational options
- Flexible approaches to inclusion based on individual needs rather than fixed profiles
- Accountability measures for inclusive practice, including audits, reviews and parent feedback
- Ability for parents to request a review to additional support through to the targeted support layers where needs are unrecognised/ unmet
- Support to manage peer relationships should be in place, including teaching which actively fosters belonging and breaks down barriers of social exclusion
- A re-evaluation of punitive behaviour policies

Children will be best supported by the Universal offer when schools create genuinely inclusive environments supported by properly resourced schools, well-trained staff, built on an inclusion ethos with clear accountability. Alternative routes to access education including options for vocational and technical skills are important for those who struggle to engage and deliver academically. Whole school SEND training should be mandatory for all staff, including administrative staff, lunchtime supervisors and support staff, with practical strategies that can be implemented in everyday settings. Schools should provide smaller class sizes where possible, sensory-friendly environments, structured breaktimes, alternative break spaces and facilitated inclusion activities that help pupils understand neurodiversity and build belonging.

There also needs to be a flexible and individualised approach to inclusion that recognises children's differing needs rather than fitting them into fixed profiles. There is a worry that children who are non-disruptive but struggling (inattention, mental health, social isolation, sensory challenges etc) will go under the radar. Parents should have accessible ways to raise concerns and there should be accountability measures for inclusive practice, including regular audits, reviews and parent feedback. Clear escalation routes are essential when universal or targeted support is not enough so that children do not remain unsupported while their needs worsen.

Parents often tell us of children and young people who struggle with punitive behaviour policies (uniform, equipment, school lunches, toilet breaks, etc) often do not take into account their disabilities, such as poor executive functioning leading to losing equipment or young people struggling with the sensory nature of clothing such as ties, shoes and blazers. These difficulties should be understood and regarded in line with reasonable adjustments under the Equalities Act.

At a whole-school level, children benefit most from consistent routines, consistent key safe adults, emotional literacy, a positive understanding of behaviour approaches and environments where they feel safe, understood and valued.

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

- A non-rigid system - layers of support should adapt to children and young people's needs with flexibility- not expect them to fit into it.
- Regular graduated approach reviews involving parents, with short review cycles and quick access to provision
- Online access to ISPs for families, including an interactive communication system with recorded footprint for tracking interactions and where concerns are raised/ responded to
- Simplified language within ISPs, that are clear, specific and easy to understand, with named responsibilities and measurable outcomes
- ISPs to be jointly agreed between families and professionals
- Real-life examples of support in practice
- Clear thresholds and entry/exit criteria between targeted support levels
- Factors such as lack of progress, emotional and mental health concerns and disengagement with education should also be evaluated
- Ongoing training for teachers
- Transparent and timely dispute resolution processes
- Accountability where agreed support is not delivered

There are concerns around a system which no longer starts with individual needs but moves to predetermined support thresholds which a child needs to fit into - which could create a rigid system, no longer having the flexibility to adapt to individual needs.

Children in the Targeted layer should have clear, practical and regularly reviewed support plans. ISPs should be jointly developed with families and professionals, accessible online to parents, and written in clear language with named responsibilities, measurable outcomes and review dates. The language used within plans should be straightforward and include practical examples of how support will look in everyday school life. This is already a process that should be happening under the SEND Code of Practice, through the graduated approach. Many parents of children currently on SEN support are unaware of the process and 'regular reviews' are often too infrequent unless there is a crisis point. How will the new system move beyond the aspiration to make sure this is guaranteed in practice?

There should be clear thresholds and entry and exit criteria for the different support layers, alongside regular graduated approach reviews involving parents. Teachers should receive ongoing quality SEND training, increasingly developing understanding and expertise, and there must be transparent systems for resolving disagreements quickly with mechanisms in place for parents to request multidisciplinary assessments. Parents also stressed the importance of accountability where agreed support is not delivered, as ISPs should be meaningful working documents rather than administrative exercises.

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

- Reliable access to specialists including Educational Psychologists, Occupational Therapists, Speech and Language Therapists, Physiotherapists, CAMHS and Music therapists with therapy provision available through schools and/or local community settings
- Fast timelines between assessment and support delivery from “Experts at Hand” in place within two-three weeks
- Joined up plans between health, social care and education
- Clear ownership and accountability across services with a mechanism to challenge assessments and delivery of provision
- Clear reintegration and transition planning between placements, including the use of support bases
- Links with a ‘navigator’ role to support out of school challenges and the family as a unit

Children in the Targeted Plus layer require reliable and timely access to specialist support. This includes Educational Psychologists, Occupational Therapists, Speech and Language Therapists, Physiotherapists, CAMHS and therapeutic services such as music therapy. Families highlighted the importance of joined-up planning between education, social care and health services, particularly where children have complex health and educational needs.

The proposed “Experts at Hand” model should include clear ownership and accountability across services, with fast response times and timely delivery of support following assessments. Families suggested that specialist support should ideally begin within two - three weeks, wherever possible. Fundamentally, there needs to be a mechanism for challenge throughout all levels of support, regarding assessments, decisions and delivery of provision. Therapies should be available through schools or local community settings to improve accessibility, and transitions between placements or support bases should include clear reintegration plans and ongoing support. There should be key links with ‘navigator roles’ to support with challenges in the home environment which should sit within the ‘experts at hand model’

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

- Sufficient local specialist placements
- Recognition that children’s needs do not always fit neatly into predefined packages
- Greater clarity around Specialist Provision Packages and legal entitlements
- Flexibility for packages to adapt as children’s needs change over time
- Capacity planning to ensure provision can actually be delivered
- Clear routes for accountability and redress if support is not delivered
- Concerns that need will be greater if a child has to advance through mediocre interventions to access a greater level of support
- Lack of clarity of what this layer would look like post16

Children in the Specialist layer can only be properly supported if there is sufficient high quality specialist provision available locally to meet the full range of needs. Families consistently report difficulties accessing appropriate placements, with many children placed far from their communities due to a lack of local capacity. Increasing local specialist provision would help children remain connected to their families, communities and support networks, while also reducing stress and disruption for children and young people.

Parents also stressed the importance of recognising that children's needs do not always fit neatly into predefined categories or provision packages. While consistency and clearer pathways may be helpful, there are concerns that standardised Specialist Provision Packages could become too rigid and fail to respond to the complexity and individuality of children's needs. Many children present with overlapping needs across education, health, communication, sensory processing, emotional wellbeing and behaviour, and support must remain genuinely needs-led rather than driven by fixed criteria or labels.

There is also a need for much greater clarity around what Specialist Provision Packages would include, how they would operate in practice, and what legal entitlements families would retain under the proposed system. Parents expressed significant anxiety about whether support contained within these packages would be fully enforceable and what routes families would have if provision is not delivered. Clear legal protections, transparent decision-making and accessible routes for challenge and redress are essential to ensure families can trust the system and secure appropriate support for their children.

Families also highlighted that children and young people's needs can change significantly over time, particularly during key transitions, periods of mental health difficulty or changes in development. Specialist support therefore needs to be flexible and responsive, with provision able to adapt quickly when needs increase or change, rather than children being locked into rigid packages that no longer reflect their circumstances.

A further concern raised was around workforce and capacity planning. Specialist support can only succeed if there are enough trained staff, therapists, specialist teachers and placements available to deliver what is set out in plans and provision packages. Parents are concerned that without sustained investment in staffing, training and specialist services, reforms risk creating expectations that cannot realistically be delivered in practice.

Parents were also worried that thresholds for accessing the Specialist layer may become too high, particularly if children are expected to progress through multiple stages of intervention before being able to access more intensive support. Families highlighted that delaying specialist intervention until children have 'failed' at lower levels of support can allow needs to escalate, leading to poorer mental health, increased school distress and more complex difficulties over time. Support should be based on need and professional evidence, not on whether a child has exhausted a sequence of interventions.

Targeted Plus provision appears to rely heavily on specialist advice and the proposed “Experts at Hand” model. However, if schools do not have sufficient trained staff, teaching assistants, mentors or dedicated time to implement that advice effectively, there is a significant risk that support identified within an ISP may exist on paper but not be consistently delivered in practice. Specialist recommendations alone will not improve outcomes unless schools have the workforce capacity, resources and expertise required to put them into action. Without this, there is a risk that children’s needs may continue to escalate while families are told support is already in place.

For Targeted Plus to work effectively, there must be genuine specialist capacity within the system, clear accountability for delivery, robust monitoring of whether support is actually being implemented, and accessible routes for escalation when provision is not working. It is also important to recognise that some children and young people may not be able to safely reintegrate into mainstream settings without significant environmental and cultural changes, and that flexibility around specialist provision must remain available where mainstream support is not meeting need.

Finally, there was considerable concern about the lack of clarity around what the Specialist layer would look like post-16. Parents felt the reforms are heavily focused on school-age provision and do not sufficiently explain how specialist support, therapies, placements and legal protections would operate for young people in further education, training, employment or adulthood pathways. Families stressed that support should not reduce simply because a young person reaches a certain age, and that post-16 provision must be fully integrated into the design of the reforms from the outset.

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

- Trained staff and mental health ambassadors in every setting
- Better links to CAMHS and early help services
- Safe spaces and quiet zones
- Recognition that the education system itself can contribute to mental health difficulties through unmet needs, the wrong learning environment or not being supported
- Provide alternative routes to education, EOTAS and online learning options
- Anti-bullying work and teaching around neurodiversity
- Flexible attendance arrangements for medical appointments
- EBSA support accessible to children, young people and families
- A recognition of the importance of trusted consistent adults
- Emotional wellbeing being valued equally alongside academic achievement

Parents also highlighted the importance of:

- Whole-setting inclusive cultures
- Structured targeted group support

- One-to-one emotional support
- Clear referral pathways to external services with quick access

Mental health and wellbeing should be embedded across the culture of education settings rather than treated as a separate service. Schools, colleges and early years settings should create safe, understanding and inclusive environments where children feel supported rather than judged or punished for difficulties linked to SEND, anxiety, belonging or emotional regulation.

Staff should receive appropriate training in SEND, autism, neurodiversity and mental health so they can recognise emotional distress, sensory overwhelm and communication difficulties early. Every setting should provide trusted adults, quiet spaces, emotional support and timely access to specialist services without long delays. There should also be stronger links with CAMHS and early help services, alongside specialist support for Emotionally Based School Avoidance, which also supports the whole family.

It must also be recognised that the school system can create mental health needs through poor practices, needs not being met, poor environments and not adequately supporting and listening to those with SEND. Mainstream is not suitable for many children/ young people and alternative routes into education must be opened up, including maintaining the flexibility of EOTAS provision and online accessibility for children who can not be in a school environment.

At a whole-setting level, positive behaviour approaches, predictable routines, consistent key adults and emotional literacy are essential. Alongside this, targeted group interventions and one-to-one support should be available for children who need additional help with emotional regulation, anxiety or social skills. Wellbeing should be treated as equally important as academic progress, as children learn best when they feel safe, regulated and included.

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.

- Mental health has been removed despite being a major barrier to learning
- There is insufficient detail on how the areas of development translate into practical support
- Links between areas of development, interventions, funding and strategies remain unclear

Parents expressed concern that the refreshed ‘areas of development’ do not sufficiently recognise the role of mental health in affecting learning and participation. Mental health difficulties, including anxiety, trauma-related conditions and neurodiversity-related burnout, were seen as significant and often primary barriers to

engagement in education. Families felt that removing or downplaying this area risks limiting educators' understanding of children's needs and the complexity of the barriers they face.

There was also concern that the proposals lack sufficient detail on how the refreshed framework will translate into practical support in everyday education settings. Parents felt it is unclear what this will mean for classroom practice, early identification of need, and the types of interventions or adjustments that children should reasonably expect to receive as a result.

In addition, families highlighted that the relationship between the areas of development, funding arrangements, intervention pathways and accountability mechanisms is not clearly defined. Without this clarity, there is concern that the framework may remain largely conceptual, without a clear route into consistent delivery or enforceable support.

Overall, parents felt that without clearer guidance, implementation detail and explicit links to practical provision, funding and accountability, the refreshed framework risks having limited impact on improving outcomes for children and young people.

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?

- Practitioners working directly within settings
- Regular multi-agency reviews
- Specialist hubs with family navigators and named key workers
- Shared data systems
- Outreach for harder-to-reach communities
- Greater expectations on nurseries to exhaust support options before refusing placements
- SEND specialist nurseries commissioned by local authorities
- Continuous access to therapies, without families needing to rerefer after 'a block'

Parentsactive supports the principle of joined-up early help; however, lived experience shows that joint working only leads to better outcomes when it is underpinned by sufficient capacity, clear accountability, and direct access to specialist support.

Effective joint working in the early years requires regular multi-agency reviews, shared information systems and specialist practitioners working directly within settings. Families highlighted the value of specialist hubs that provide family navigators, named key workers, activities for children and support for parents.

Access to therapies and not needing to rerefer after a 'block' would have a greater long-term impact on young children.

Effective joint working should be underpinned by clear, shared protocols across early years settings, Best Start Family Hubs, health visitors, community paediatrics, SEND services and local authorities, with defined timescales and clearly assigned responsibilities. Families must not be left bouncing between Early Help and higher-threshold services while risks increase and no single service assumes accountability.

Digital profiling tools should serve as an initial step to guide support, rather than acting as gatekeeping mechanisms that delay clinical assessments, EHCP consideration or access to specialist input. Their value lies only in triggering timely, meaningful intervention delivered by trained professionals with the capacity to act.

There should also be stronger outreach to harder-to-reach communities and clearer expectations on nurseries to fully explore support options before stating that they cannot meet a child's needs. Parents felt local authorities should commission specialist SEND nursery provision and ensure better coordination between health, education and family support services.

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.

- Clear escalation pathways
- Improved SEND training for health visitors/ workers
- Accessible advice or duty lines for parents
- Better alignment between health and education assessments
- Greater oversight and accountability

The EYFS progress check and Healthy Child Programme review could be improved through clearer escalation pathways and better alignment between health and education assessments. Health visitors and early years professionals should receive in-depth and ongoing SEND training so that concerns are recognised earlier and acted upon more consistently as families tell us they often have to repeat themselves before issues are given weight.

Families also suggested the creation of advice or duty lines where parents can raise concerns if they feel their child's needs are not being recognised. Greater oversight and accountability are needed to ensure that concerns identified through reviews lead to timely support and intervention.

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

1. Effective early intervention methods
2. Transition success data
3. Workforce training impact

The top priority areas for building and sharing evidence within the National Inclusion Standards should include effective early intervention methods, successful transitions between stages of education and into adulthood, and the impact of workforce training on outcomes for children and young people with SEND.

Parents strongly emphasised the importance of identifying and sharing evidence about interventions that lead to earlier identification of need and timely support. Families highlighted that many children currently only receive meaningful support once needs have escalated or reached crisis point. There is therefore a need for evidence-based approaches that demonstrate how early intervention can improve outcomes, reduce long-term difficulties and prevent escalation of need.

Transition success was also identified as a key area requiring stronger evidence and monitoring. Parents stressed that transitions between educational stages, particularly into post-16 education, employment and adulthood, are often points where support breaks down. Evidence should therefore focus not only on educational attainment, but also on wellbeing, sustained placements, independence, employment outcomes, participation in the community and long-term stability for young people with SEND.

The impact of workforce training was highlighted as another major priority. Families want greater understanding of which types of training lead to meaningful improvements in practice, inclusion and outcomes for children and young people. This should include training in neurodiversity, trauma-informed approaches, mental health, communication needs and practical classroom strategies. Parents stressed that training should not only measure staff confidence, but also whether it results in measurable improvements in children's experiences, participation, wellbeing and progress.

Overall, parents felt that the National Inclusion Standards should focus on evidence that demonstrates real-world impact for children and families, ensuring that approaches are informed by both professional expertise and lived experience.

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

- Neurodiversity understanding and recognition of less visible or more complex areas of need

- Practical classroom strategies
- Behaviour as communication, including understanding and responding to challenging behaviour
- Communication with families, how to understand the struggles and be supportive allies
- Awareness of national and local support services
- Trauma-informed practice
- Bullying prevention and supporting bond building through fostering belonging
- Examination of behaviour policies which can negatively impact SEND pupils and actively be discriminatory

National training should include greater understanding of neurodiversity alongside practical classroom strategies that staff can implement confidently in daily practice. A key priority is the early identification and recognition of less visible or more complex forms of need. This includes presentations such as masking, sensory and communication differences, difficulties with executive functioning, internalised distress, autistic burnout, trauma-related responses, demand avoidance, and the interplay between SEND and mental health. Training should also focus on behaviour as communication, trauma-informed approaches and understanding how behaviour policies can negatively impact children with SEND. There needs to be a move in schools towards more neuroaffirming whole school approaches to SEND including sensory safe spaces, proactive reasonable adjustments and working with parents and young people to understand how best to create environments for thriving.

Staff should receive guidance on effective communication with families, awareness of local services and support networks, and strategies to recognise bullying, support friendships and reduce isolation among SEND pupils. Constructive dialogue and relationship-building with families should also form a key part of training.

It is important to recognise that training on its own will not lead to improved outcomes unless staff also have sufficient time, strong leadership support, administrative capacity and access to specialist advice to put their learning into practice.

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

- Specific allocated time for SEND work
- Increased staffing and resources
- Access to specialist support
- Holistic support for teachers and staff undergoing the upskilling process

Parents strongly felt that the reforms place significant additional responsibility on schools and staff who are already under pressure and regularly fail children. Passing responsibility on to schools does not create reassurance for families. Families frequently report experiences where provision is not implemented, access to

therapies closed, EHC needs assessments are not requested, and awareness of SEND remains inconsistent.

The workload will only be sustainable if the reforms are supported by realistic staffing levels, protected time, and clear accountability. Without these, changes designed to improve inclusion risk generating additional paperwork, increasing conflict, and leaving more needs unmet.

While training is essential, it will not ease workload unless staff have the time and capacity to apply what they have learned.

Schools require additional staffing, increased resources, access to specialist support and protected time specifically allocated for SEND responsibilities if these reforms are to be implemented successfully. Without increased investment and workforce capacity, there is concern that expectations will rise without schools being equipped to deliver the support children need.

The implementation of the reforms will place significant pressure on school staff, and it is important to recognise that supporting them through this transition requires a holistic approach. Alongside mentoring and strong support networks, staff should have access to wellbeing-focused interventions such as meditation and guided mindfulness to help sustain their capacity and resilience.

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

- Greater oversight of whole-school inclusion
- Protected time and senior leadership status
- Mandatory training
- Accountability for outcomes
- Limiting dual roles so SENCOs are more accessible to families
- The SENCO role should be a dedicated position, with at least 75% of staff time allocated to these responsibilities
- New SENCOs should be in a buddy system of support for the first year, connected with an experienced SENCO for supervision

The SENCO role should have greater oversight of whole-school inclusion and hold senior leadership status within schools. SENCOs require protected time to carry out their responsibilities effectively, alongside mandatory and ongoing training. The role also requires greater authority within the school. SENCOs should be empowered to influence whole-school systems, staff practice, attendance strategies, behaviour approaches, transition planning, and the implementation of reasonable adjustments.

Families report that too often SENCOs have poor understanding of SEN conditions and processes. Parents also highlighted the importance of accountability for outcomes and raised concerns that SENCOs holding multiple roles can become difficult for families to access. The role should evolve to ensure SENCOs are visible,

responsive and able to coordinate effective support across the school. For new SENCOs to take on the position, they should be buddied with another experienced SENCO to have a system of support, gain understanding and develop skills.

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

- Co-production with families
- Clear, accessible language
- Defined accountability and responsibilities
- Regular reviews
- Measurable outcomes
- Quality assurance and spot-checking processes
- Inclusion of the child or young person's voice
- Standardised formats
- Clear dispute resolution processes

Parents emphasised that ISPs must:

- Clearly specify support
- Be actively used by staff
- Be regularly updated
- Be properly resourced
- Include accountability where provision is not delivered

Parents express concern that Individual Support Plans (ISPs), despite being central to the reforms, are not clearly proposed as legally enforceable documents. A primary concern for Parentsactive is that a legal duty to produce an ISP is not the same as a legal duty to secure the provision written in it. Families feel there is insufficient clarity about what rights parents would have if provision in an ISP is not delivered, how ISPs would compare legally to EHCPs, or how disputes regarding ISP contents could be challenged. Without clear legal protections and accountability, many parents fear ISPs could become 'plans on paper', with support dependent on local interpretation and available resources rather than enforceable duties.

Families need ISPs to be clear, specific and easy to understand. Plans should set out exactly what support a child will receive, how often it will happen, who is responsible and how progress will be monitored. ISPs should be standardised, co-produced with families and include the voice of the child or young person wherever appropriate.

There should be visible accountability, clear review cycles, measurable outcomes and accessible dispute resolution processes. Teachers and support staff must actively use ISPs within classroom practice rather than treating them as administrative documents. Parentsactive also stress the importance of quality

assurance processes, external spot-checking and confidence that the support written into plans can actually be delivered.

There was concern that accountability mechanisms remain insufficient, particularly where school complaints processes lack independence and Ofsted inspections provide only limited snapshots of SEND practice. Many families felt that, under the proposed reforms, conflict may continue but shift from local authorities to schools, potentially placing further strain on relationships between families and education settings.

For real assurance, ISPs must include a clear legal duty to deliver the provision they specify, minimum statutory content requirements, a mandatory requirement to capture parent and child voice, and an independent route for escalation.

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

- Direct links to classroom actions
- Digital and accessible formats
- Clear, accessible language – with a glossary of abbreviations
- Usable by all staff, not only specialists

ISPs should link directly to practical classroom actions and strategies that all staff can implement consistently. Plans should be digital, accessible and easy for all professionals to understand and use, rather than being limited to specialist staff only.

To ensure practicality, ISPs should follow a nationally standardised template with required fields. These should clearly set out the child or young person's learning barriers, the support to be provided, who is responsible for delivering it, how often and in what context it will take place, any specialist input required, and how progress will be monitored.

In summary, an effective ISP should be nationally consistent, clearly structured, specific, free of jargon, co-produced with families, easily accessible to all relevant staff, sufficiently detailed to guide delivery, and underpinned by clear accountability.

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?

- Early planning from Year 9 or earlier
- Joined-up planning across education, health, social care with families
- Strong links between schools and colleges
- Supported visits and gradual transitions
- Clear pathways into employment and training
- Access to supported internships, including for young people without EHCPs
- Better work experience opportunities
- Clear local authority information on post-16 pathways and practical support to access them
- Clearer pathways into adult services, especially adult social care and better transparency around eligibility criteria for adult services
- Easy to access information and support to understand mental capacity, deputyship, power of attorney and legal duties prior to reaching adulthood and impact points

Transitions should be planned early, ideally from Year 9 onwards, with regular reviews involving families, schools, colleges, social care, health services and local authorities. There should be stronger partnerships between schools and post-16 providers, alongside supported visits and gradual transition arrangements.

Families highlighted the need for clearer employment pathways, expanded access to supported internships, and meaningful work experience opportunities. Supported internships should be available to all who would benefit from them and should lead to strong employment outcomes, including for young people without EHCPs, who are often overlooked in the current system. One parent described having to apply for an EHC needs assessment at age 18 because their young person was unable to access education or sustain employment without support and therefore had been unable to access supported internships.

Local authorities should provide clear, accessible information about post-16 pathways, including further education, specialist provision, employment support, adult services and benefits. In addition, they should offer practical, tailored support to help young people and their families understand, navigate and access the pathways most appropriate to their individual needs and aspirations.

Parents also stressed that reforms must properly reflect the realities of post-16 education, which differs significantly from school systems in areas such as travel, funding, integrated access of health services in education, challenges in accessing adult services and legal protections.

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?

- Calm, safe and supportive environments
- Smaller groups and improved staff ratios
- Sensory-friendly and breakout spaces
- Trusted adults
- Flexible movement between mainstream and support base provision

- Skilled SEND staff and integrated specialist input
- Strong communication with families
- Focus on wellbeing and meaningful inclusion

A good Inclusion Base should provide a calm, safe and genuinely supportive environment that helps children access learning while remaining connected to the wider school community. Bases should include trained specialist staff, smaller group support, sensory-friendly spaces, emotional support, break out spaces and access to therapies where needed.

Children should be able to move flexibly between mainstream classes and the Inclusion Base depending on their needs, with clear reintegration planning and consistent communication between staff. Inclusion Bases should focus on wellbeing, building confidence and meaningful access to education rather than simply managing behaviour or capacity pressures.

Parents also highlighted the importance of trusted adults, tailored enrichment activities, strong family communication and environments that feel positive, fun and welcoming for children.

Families are concerned that Inclusion Bases could risk becoming forms of internal segregation, functioning as behaviour units or low-cost alternatives to specialist provision. Without clear definition and robust oversight, there is a danger that children may be separated from mainstream school life, experience reduced access to the full curriculum, lose meaningful peer interaction, and remain nominally 'in mainstream' while their needs are not effectively met.

There must be clear national safeguards that define the purpose of Inclusion Bases, the children they are intended to support, the specialist input required, and how full curriculum access will be maintained. Expectations should also include clear plans for reintegration and transparent monitoring of outcomes.

Families must be actively involved in all decisions, with clear and accessible routes to challenge any inappropriate use.

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

- Skilled staff and specialist support
- Maintaining peer and classroom connections
- Whole-school inclusive cultures
- Monitoring children's wellbeing and inclusion experiences
- Ensuring Inclusion Bases enhance inclusion rather than becoming holding spaces due to capacity pressures

Inclusion Bases should maintain strong links with mainstream classrooms and peers, so children remain meaningfully connected to the wider school community. Skilled staff and regular specialist input are essential, alongside monitoring of whether

children feel safe, included and able to access learning. Consistent safe adults are also fundamental for children and young people to thrive.

Parents stressed that Inclusion Bases must not become holding spaces created because of wider pressures within mainstream schools. Their purpose should be to enhance inclusion and support children to participate successfully in mainstream education wherever appropriate. Inclusion Bases can play a valuable role in helping children succeed within mainstream education, but only where they are adequately resourced, clearly defined, and embedded within a structured, needs led pathway. They should form part of a continuum of support, rather than acting as a substitute for necessary adaptations within the wider school environment. Inclusion Bases must never be used simply to contain children whose needs are not being met in mainstream classrooms.

It is also essential to recognise that, for some children, neither mainstream settings nor Inclusion Bases will be appropriate. In these cases, there must be a clear, lawful and properly funded pathway to Education Otherwise Than at School (EOTAS), ensuring that children can access education that genuinely meets their needs.

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?

- Clear referral and access routes
- Defined response times
- Clear accountability between services
- Capacity planning
- Families to be involved in the process
- Family navigator roles to support families outside school settings

Parentsactive supports the principle of quicker access to specialist advice; however, this must extend beyond providing guidance to schools alone. Families need clear information on whether the *Experts at Hand* model will include direct assessments, detailed written recommendations, therapeutic input, environmental audits, staff modelling, and follow-up reviews. There must also be full transparency around waiting times, eligibility criteria, and the pathway for children whose needs require more than advisory support.

Families are concerned that if the *Experts at Hand* model is used primarily to upskill schools without sufficient direct specialist input, children may still be left without the assessment, therapy, and provision they require. Advice alone, without the capacity

and resources to implement it, will not improve outcomes and risks delaying escalation—leading to increased unmet need, frustration, and a loss of trust.

The Experts at Hand model requires clear access routes without unnecessary gatekeeping, defined response times and strong accountability between education, health and social care services. Capacity planning is essential to avoid delays and bottlenecks. It should include direct work with children where required, written recommendations, follow up reviews, audits, staff training and pooled funding from education, health and social care and an independent escalation route where services disagree about responsibility.

Families also highlighted the value of a navigator role to support parents in coordinating joined up support outside of school settings and help families understand and access support services more easily.

Families questioned how the proposed “Experts at Hand” model could succeed without addressing existing workforce shortages across Educational Psychology, Speech and Language Therapy, Occupational Therapy, CAMHS and specialist teaching services. There were strong concerns that schools and services already struggling with staffing and funding pressures may not have the capacity to deliver or sustain the reforms effectively.

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?

- Specialist expertise networks
- Clear pathways to placement
- Retaining parental choice
- Reducing long distance placements where possible

There should be clear pathways into specialist provision supported by strong specialist expertise networks. Families should retain parental choice, and children should, wherever possible, be able to access suitable placements close to home and within their communities.

Complex needs are not clearly defined, who qualifies becomes subjective without clear criteria, this could lead to inconsistency and disputes.

A suitable model for low incidence and highly complex needs should therefore encompass individualised assessment, robust planning to ensure sufficient placements, access to appropriate specialist expertise, active parental involvement, clear and transparent funding accountability, and an independent, binding mechanism for redress where a proposed placement does not meet need.

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

- Needs-led rather than label-led
- Flexible and adaptable
- Transparent and clearly costed
- Linked to outcomes

Specialist Provision Packages should be designed around the individual needs of children and young people rather than broad diagnostic labels or predefined categories. Parents expressed concern that overly standardised packages risk fitting children into systems, rather than designing support around the complexity and individuality of their actual needs. Many children present with overlapping educational, sensory, communication, emotional and health needs which may not fit neatly into a single category. Provision therefore needs to remain genuinely needs-led, person centred and responsive to the child as a whole.

Families also stressed that Specialist Provision Packages must be flexible and adaptable over time. Children and young people's needs can change significantly as they develop, experience transitions, or encounter periods of increased anxiety, mental health difficulty or school distress. Packages should therefore allow support to increase, reduce or change in response to need, rather than locking children into rigid pathways that may no longer be appropriate.

Parents highlighted the importance of transparency within the proposed system. Specialist Provision Packages should clearly set out what support is included, how decisions are made, who is responsible for delivery, and how provision will be monitored and reviewed. Families also felt that packages should be clearly costed so there is greater understanding of what provision is being funded and whether sufficient resources exist to deliver it effectively in practice.

Provision should also be linked to meaningful outcomes for children and young people, including wellbeing, communication, independence, emotional regulation, belonging and access to learning, rather than solely academic attainment. Parents emphasised that outcomes should reflect the individual child's needs and aspirations and not be driven by narrow performance measures or assumptions about what success should look like.

Parents also raised concern that the current difficulties within the SEND system are often linked to inconsistent implementation, lack of capacity, insufficient funding and failure to deliver provision already identified, rather than evidence that individualised planning itself is ineffective. Families consistently report that when EHCPs are detailed, specific, properly resourced and fully implemented, they can have a significant positive impact on children's lives and educational experiences. There is therefore concern that moving away from individualised entitlements towards broad provision packages risks prioritising administrative simplicity and resource

management over a child or young person's right to appropriate, personalised support and suitable education.

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?

- Clarity on legal protections
- Strong accountability
- Clear links between plans and delivery
- Accessible escalation routes
- Avoiding dilution of enforceability

For these proposals to work effectively, there must be absolute clarity around legal protections, accountability and enforceability. Parents consistently stated that families need confidence that children and young people will continue to have a clear legal entitlement to the provision they require, and that reforms will not weaken existing protections in practice. Many families expressed concern that the proposed model appears to fundamentally change the role and function of the EHCP while retaining the same name, creating uncertainty about what rights and protections families would actually retain under the new system.

A major concern raised by parents was the proposal for day-to-day educational provision to sit within Individual Support Plans (ISPs) rather than within the EHCP itself. Parents active highlights that a legal duty to produce or maintain an ISP is not the same as a legal duty to secure and deliver the provision written within it. Parents stressed that if detailed daily provision is moved into ISPs, there must be clear assurance that this provision remains specific, quantified, enforceable and independently challengeable where it is not delivered. Without this, there are concerns that the support children rely on most in day-to-day school life could become less protected in practice.

Parents repeatedly stated that many families already experience significant difficulties securing provision that is currently legally enforceable through Section F of an EHCP. There is therefore considerable anxiety that moving detailed provision into school led ISPs could weaken accountability further, particularly if the main route for challenge becomes internal school complaints processes rather than independent legal mechanisms. Families stressed that accessible, transparent and independent escalation routes are essential where support is not being implemented appropriately.

Strong accountability systems are also needed to ensure that support written into plans is actually delivered consistently in practice. Families highlighted the importance of clear links between Specialist Provision Packages, EHCPs and day-to-day delivery within schools and settings. Provision should not exist only on paper;

there must be effective monitoring, oversight and consequences where agreed support is not implemented. Parents repeatedly stressed that reforms should strengthen accountability rather than dilute it.

Parents also expressed concern about any changes that may weaken parental preference or limit the ability of tribunals to make binding decisions around placements and provision. Families emphasised the importance of maintaining independent routes of redress which lead to enforceable outcomes, rather than processes which simply return decisions to the same setting or local authority for reconsideration. Trust in the system depends on families being able to access independent challenge where provision is not meeting need.

There were also concerns about the wider consequences if enforceability becomes weaker and placements break down more frequently. Parents highlighted that where children are unable to access appropriate support or placements fail, families may increasingly feel forced to remove children from school to protect their wellbeing and mental health. This risks shifting pressures onto families, health services, social care and wider public systems, while leaving children without stable access to education.

Overall, parents felt that these proposals will only work if there is clear legal protection around entitlement to provision, strong independent accountability, enforceable day-to-day support, accessible routes for escalation and sufficient oversight to ensure that support identified within plans is consistently delivered in practice.

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?

- Fast-track assessments
- Earlier therapy access
- Reduced diagnostic delays
- Family-centred planning
- Better integration with health services
- Improved training for health workers
- Clear information and support to navigate SEND systems for families

For this proposal to work effectively in practice, there must be a genuinely fast and accessible route to assessment and support for young children with complex needs. Parents strongly supported earlier identification and intervention, but highlighted that this will only succeed if children are able to access assessments, therapies and specialist input quickly, without families having to wait until needs escalate or children reach crisis point. Families also stressed that there needs to be greater clarity around how “complex needs” will be defined, to ensure children are not

excluded from support due to overly narrow criteria or inconsistent interpretation between local areas.

Parents consistently reported that delays in assessment, diagnosis and access to therapy currently create long term negative impacts on children's development, wellbeing and ability to access learning. Earlier access to Speech and Language Therapy, Occupational Therapy, Physiotherapy, Educational Psychology and other specialist support is essential, regardless of whether a formal diagnosis has already been secured. Families highlighted that support should be based on identified needs and functional difficulties rather than children having to wait for lengthy diagnostic processes before help becomes available.

Families also stressed the importance of reducing diagnostic delays across health and neurodevelopmental pathways. Long waiting lists for autism and ADHD assessments, speech and language support and other specialist services often leave families without support during the most critical early years of development. Parents felt that earlier intervention should not depend solely on diagnosis, but that where diagnostic assessments are required, these pathways should be properly resourced and delivered within significantly shorter timescales.

Planning and support should remain family-centred, locally accessible and closely integrated across education, health and social care services. Parents repeatedly emphasised the importance of joined up working between nurseries, health visitors, therapists, GPs, paediatricians, local authorities and early years SEND teams so that families do not have to repeatedly explain their child's needs or navigate fragmented systems alone. Clear communication, shared planning and coordinated support between services are essential to prevent families becoming overwhelmed during the early years.

Parents also highlighted the need for improved SEND training for health professionals, particularly health visitors and early years practitioners, so that signs of SEND, neurodivergence, sensory needs and developmental differences can be recognised earlier and more consistently. Families shared concerns that some early worries raised by parents are currently dismissed or minimised, delaying access to support and increasing parental anxiety. Better training would help professionals identify needs earlier, respond appropriately to family concerns and provide clearer pathways into support.

Families also need accessible, clear and practical information about how to raise concerns, what support is available locally and how to navigate the SEND system from the earliest stage possible. Many parents described the current system as confusing, fragmented and difficult to navigate, particularly during the early years when families may still be trying to understand their child's needs.

Parents strongly felt that a dedicated navigator or key worker role could make a significant difference for families during this stage. A named professional who can guide families through assessment pathways, explain available support, coordinate services and provide ongoing communication would help reduce stress, improve access to services and ensure families are able to access help more quickly and

consistently.

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

- Multi-disciplinary input
- Central importance of parent voice
- Holistic consideration of education, health and social needs
- Avoiding over-reliance on thresholds

Needs assessments should draw on robust multi-disciplinary input to ensure a full and accurate understanding of the child or young person's needs. This should include contributions from education professionals such as teachers and SENCOs, health professionals including speech and language therapists, occupational therapists, educational psychologists and paediatricians where appropriate, as well as social care input where relevant. Families consistently highlighted that no single professional can capture the full picture of a child's needs in isolation, and that assessments must bring together different perspectives to build a shared and coherent understanding.

A central principle raised by parents is that the voice of the child, young person and their family must sit at the heart of the needs assessment process. Families bring unique, day-to-day insight into how needs present at home, in the community and across different settings, which is often not visible in formal reports alone. Parents stressed that this lived experience should be treated as a key form of evidence alongside professional assessments, not as supplementary or secondary information. Children and young people should also be supported to share their views in accessible and meaningful ways, so that their experiences and preferences directly inform decision-making.

Parents also strongly supported a holistic approach to needs assessment, which considers the full range of a child's educational, health, communication, emotional, sensory and social needs together, rather than separating them into siloed categories. Families highlighted that needs are often interconnected and that difficulties in one area frequently impact others. A fragmented assessment process risks missing the underlying causes of difficulties and can lead to incomplete or ineffective support planning. A joined up approach across education, health and social care is therefore essential.

Families also raised concerns about over reliance on rigid thresholds or eligibility criteria within assessment processes. While thresholds may provide structure, parents felt they can risk excluding children whose needs are significant but do not meet narrow definitions or diagnostic criteria. Many families reported experiencing delays or barriers to support due to waiting for needs to escalate before intervention is offered. Instead, assessments should be responsive to functional need and impact on daily life, ensuring that support is provided early and proportionately rather than being delayed until arbitrary thresholds are reached.

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?

- Children's needs first rather than cost
- Distance and community links
- Suitability of provision
- Capacity and expertise
- Parental preference

Local authorities should ensure that the child or young person's needs are the primary consideration when proposing potential settings to be named on a plan, rather than financial constraints or placement availability driving decision-making. Families consistently emphasised that the starting point must be what will best meet the child's educational, developmental, social and emotional needs, with cost considerations not overriding entitlement to appropriate provision.

Parents also highlighted the importance of considering distance from home and maintaining strong community and family links when identifying suitable settings. Long travel times or placements far from home can have a significant impact on a child's wellbeing, family life and ability to sustain relationships within their local community. Where possible, children should be supported to access provision that allows them to remain connected to their local environment and support networks, unless their needs require specialist provision further afield.

Suitability of provision is a key factor and must be assessed carefully, including whether the setting can genuinely meet the child's individual needs in practice, not just in principle. Families stressed the importance of looking beyond stated offers or policies and considering whether the school or setting has a proven track record of effectively supporting children with similar needs. This includes consideration of the curriculum approach, inclusive practice, behaviour policies, accessibility and availability of therapies and specialist support.

Capacity and expertise within settings must also be taken into account. Parents highlighted concerns that some schools may be proposed despite lacking sufficient trained staff, resources or specialist knowledge to deliver the support required. A setting should only be considered suitable if it has the capacity to implement provision consistently and sustainably, including access to appropriately trained staff such as SENCOs, teaching assistants, therapists and specialist practitioners where needed.

Parental preference should remain a central factor in decision-making, alongside professional evidence. Families bring essential insight into their child's needs, experiences and what has or has not worked previously. Parents stressed that their knowledge of their child should be valued as part of a shared decision making process, rather than treated as secondary to institutional or administrative considerations.

Parents also raised concerns about proposals that may limit families to a restricted list of settings. There is anxiety that narrowing choice could reduce access to genuinely appropriate provision and place children in environments that are not fully suitable for their needs. Families stressed the importance of maintaining meaningful choice and ensuring that any proposed list of settings is not overly restrictive, but instead reflects a full range of appropriate, high-quality options capable of meeting individual needs.

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

- Clear and comparable information
- Visits and lived experiences
- Individual SENCO meetings
- Independent advice

Parents need clear, accessible and genuinely comparable information about all available settings to make informed decisions that reflect their child's needs. Information should be presented in a consistent format across settings so that families can meaningfully compare provision, rather than relying on variable or incomplete descriptions. This should include not only what support is intended to be provided, but evidence of what is actually delivered in practice for children with similar needs.

Families highlighted the importance of being able to visit settings and experience them in person wherever possible. Visits should allow parents and children to see the learning environment, meet staff and understand how support is implemented day to day. Where appropriate, visits should be adapted to meet the needs of children who may experience anxiety or sensory difficulties, ensuring that all families are able to participate meaningfully in the process. Hearing from other families about real experiences of placements was also seen as valuable in helping parents understand how provision works in practice over time, not just at point of admission.

Individual meetings with SENCOs and key staff were identified as essential to help families understand how a setting would meet their child's specific needs. These discussions should be detailed and personalised, allowing parents to explore how support would be delivered, how progress would be monitored, and how any challenges would be addressed. Families stressed the importance of these conversations being honest and realistic rather than overly general or promotional.

Parents also strongly emphasised the need for access to independent, well-resourced advice services when making decisions about settings. Services such as SENDIASS, alongside trusted parent-led or voluntary sector organisations, were seen as vital in helping families interpret information, understand their rights and make informed choices. Families stressed that this advice must be clearly independent of local authority influence, particularly where there may be differing views about appropriate provision.

In addition, families highlighted that decision-making should be supported by detailed, standardised information about each setting's SEND provision. This should include SEND performance data, staff-to-pupil ratios where relevant, availability of specialist staff, and how frequently and reliably therapies or interventions are delivered, including any waiting times. Parents also wanted clarity on the training levels and expertise of staff responsible for delivering Individual Support Plans, as well as evidence of how the setting supports children with similar needs and whether outcomes are sustained over time, including for children returning from inclusion bases or alternative provision.

Families also stressed the importance of environmental information, which is often overlooked but critical for children with sensory, physical or medical needs. This should include details about acoustics, lighting, sensory spaces, quiet areas, accessibility, safe spaces, medical facilities, classroom layout, movement around the building and how the environment is adapted to support regulation, comfort and participation. Without this information, parents felt it is difficult to assess whether a setting is genuinely suitable for their child.

Parents further highlighted the need for transparency about whether a setting can meet a child's needs immediately upon placement, or whether support is dependent on external services that may involve delays or uncertainty. Information about waiting lists for therapies, availability of specialist input and reliance on external agencies should be clearly set out so families understand what support will be in place from day one.

Finally, families emphasised that clear information must be provided about what happens if they disagree with a proposed placement or if a placement breaks down. Without accessible, independent routes for challenge and redress, parental choice risks becoming symbolic rather than meaningful. Families stressed that informed decision-making depends not only on information about settings themselves, but also on confidence in the systems available to resolve disputes fairly and independently.

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.

Parents actively recognise that Alternative Provision (AP) can play an important and positive role for some children and young people, particularly those who struggle within large mainstream environments or whose needs are not being met in their current placement. Families highlighted that smaller class sizes, more flexible approaches, stronger relationships with staff and more tailored support can allow some children to feel safer, more regulated and better able to engage in learning than they have previously experienced in mainstream settings.

Parents also stressed that AP should not automatically be viewed as a short term or negative placement. For some children, these environments may provide the most appropriate educational setting and can lead to significant improvements in wellbeing, attendance, confidence and engagement with learning. Where children are clearly thriving in Alternative Provision, families felt there should be careful consideration of whether longer term specialist placement options may be more appropriate, rather than assuming reintegration into mainstream education is always the desired or achievable outcome.

At the same time, families recognised that for some children AP can successfully provide a temporary period of stability, support and intervention before reintegration into mainstream education. Where reintegration is planned, this should be gradual, carefully supported and centred around the child's readiness and wellbeing rather than fixed timelines or pressure on placements. Clear planning, communication between settings and ongoing support are essential to make transitions successful and sustainable.

Families generally suggested that around six months - one year would be an appropriate maximum length for a temporary placement in Alternative Provision before a longer-term decision should be formally reviewed. Parents felt this timeframe would usually provide sufficient opportunity to assess whether the child is able to reintegrate successfully into mainstream education or whether a more specialist or long term placement is needed. However, families stressed that flexibility must remain important, as children's needs and circumstances vary significantly and rigid timescales should not override professional judgement or the child's best interests.

Parents also expressed concern that Alternative Provision should never become a holding place for children whose needs are not being properly assessed or met elsewhere in the system. AP placements should include clear objectives, regular reviews and meaningful planning for the child's longer-term educational pathway. Families highlighted that children should not remain in unsuitable or uncertain placements simply due to delays in accessing assessments, specialist provision or appropriate support.

Parents are concerned that the reform proposals do not adequately address EOTAS (education other than at school), which represents a significant worrying gap. For some children, EOTAS is necessary because no available school setting can safely or appropriately meet their needs. It is essential that these children are not overlooked within the reformed system and continue to have access to suitable and meaningful educational opportunities.

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.

- It does not create additional capacity
- Demand for specialist placements already exceeds supply
- Families often rely on independent provision because alternatives do not exist
- There is concern that reducing costs may become prioritised over meeting needs

While parents recognised the need for greater oversight and accountability within the Independent Special School (ISS) sector, many felt that regulation alone will not address the fundamental issue facing families: a lack of sufficient suitable specialist placements. Families consistently highlighted that demand for specialist provision already significantly exceeds available capacity across both maintained and independent sectors. As a result, many parents feel they have little genuine choice and often rely on independent provision because no appropriate local alternative exists for their child.

Parents stressed that many children and young people are simply unable to cope within mainstream environments, even where support is in place. For these children, specialist provision is not a preference but a necessity in order to access education safely, consistently and meaningfully. Families expressed concern that discussions around cost can sometimes overlook the reality that placements are often driven by levels of need and the shortage of appropriate specialist provision, rather than parental preference alone.

While greater regulation may help improve consistency, transparency and quality assurance across the sector, parents questioned whether the proposed changes would actually increase the availability of suitable placements. Without significant investment in specialist provision, workforce capacity and local specialist services, families feared that regulation alone may have limited impact on the availability of placements children genuinely need.

There was also concern that a strong focus on reducing costs could unintentionally lead to reduced provision or increased pressure to place children in unsuitable mainstream settings rather than improving support. Families stressed that cost-saving measures should never override the child's right to appropriate education and support. Parents highlighted that when children are placed in environments unable to meet their needs, the long-term consequences can include school trauma, mental health deterioration, exclusion, family breakdown and increased costs to wider public services over time.

Families also raised concerns that independent specialist placements are often only accessed after prolonged periods of unmet need, placement breakdown or tribunal processes. This reflects wider gaps within the SEND system rather than an overreliance on independent provision itself. Parents felt that improving mainstream inclusion and expanding high-quality local specialist provision would be more effective in reducing pressures on the independent sector than regulation alone.

Overall, parents supported the principle of greater oversight and accountability within the ISS sector, but stressed that regulation on its own will not create the specialist capacity currently missing from the system. Families felt that any reforms must remain firmly focused on ensuring children can access the right provision for their individual needs, rather than prioritising cost reduction over suitability and outcomes.

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

- Transparent reporting of SEND spending
- Linking funding to outcomes
- External scrutiny
- Clear expectations and consequences

Settings should be held accountable for Inclusive Mainstream Funding through a transparent, consistent and independently monitored framework that clearly shows how funding intended for SEND is being used in practice. Parents emphasised that funding should not be considered effective simply because it has been allocated, but only where it can be demonstrated that it has resulted in meaningful, sustained improvements for children and young people with SEND.

Families strongly supported transparent reporting of SEND spending, including clear information on how funding is distributed within schools and across trusts, what provision it is intended to support, and whether it is reaching the children it is allocated for. Parents frequently reported that it is currently difficult to see how SEND funding translates into actual provision in the classroom, and that greater clarity is needed to build trust and confidence in the system.

Accountability should also be closely linked to measurable outcomes, but families stressed that outcomes must go beyond academic attainment alone. Indicators of success should include improved attendance, reduced exclusions, increased inclusion and participation, improved wellbeing, positive engagement with learning, and clear evidence that children's needs are being met in practice. Families emphasised that funding should be judged on whether it makes a real difference to children's daily experiences, not simply on whether services or policies are in place.

Parents also highlighted the importance of independent external scrutiny to ensure accountability is meaningful and not solely managed within schools or multi-academy trusts. Families raised concerns that internal systems alone may lack sufficient independence, particularly where schools are responsible for both delivering and evaluating provision. External oversight was seen as essential to ensure consistency, fairness and trust, and to provide families with confidence that funding is being used appropriately.

There should also be clear expectations set nationally about how Inclusive Mainstream Funding must be used, alongside explicit consequences where funding is not being spent in line with its intended purpose or where provision is not delivered

effectively. Parents emphasised that accountability must include not only reporting requirements but also action where failures are identified, ensuring that children are not left without the support they are entitled to.

Families also added that accountability systems must move beyond written inclusion strategies or policy statements alone. There needs to be evidence that funding is directly improving children's lived experience in school, including whether children feel safe, included and supported, whether attendance is improving, whether families report better experiences, and whether children are making sustained progress over time. Without this, families felt there is a risk that funding becomes visible on paper but not in practice.

Parents further stressed that accountability must include clarity about workforce capacity and delivery. Where funding is intended to support additional staffing, training or specialist input, schools should be required to demonstrate that these resources are in place and that staff have the time, skills and support needed to deliver interventions effectively. Families were concerned that without this, there is a risk of 'paper based inclusion', where plans exist but cannot be realistically implemented due to workforce constraints.

Overall, parents felt that Inclusive Mainstream Funding should only be considered successful if it leads to real, measurable improvements in children's safety, inclusion, attendance, wellbeing and progress, supported by strong transparency, independent scrutiny and enforceable accountability mechanisms.

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

- Reduced independent oversight
- Increased conflict between parents and schools
- Decisions potentially becoming resource-driven rather than needs-led

Parents raised significant concerns about proposals for more SEND funding to sit directly within mainstream school budgets, particularly where schools would become both the provider and gatekeeper of support while operating under considerable financial pressure. Families worried that, without sufficient independent oversight and accountability, decisions about support may increasingly become influenced by resource limitations and budget management rather than being fully driven by the individual needs of children and young people.

Many parents expressed concern that this could place schools in an extremely difficult position, balancing the needs of children against wider staffing and financial pressures. Families feared that where resources are stretched, there may be increased pressure to limit access to support, avoid escalation to higher levels of provision, or rely on lower cost interventions even where these are not fully appropriate for the child's needs. Parents stressed that SEND support must remain needs led, with decisions based on what children require to access education safely

and successfully, rather than what is most financially manageable within a school budget.

Families also highlighted concerns about reduced independent oversight if more funding sits directly within schools or multi-academy trust structures. Parents frequently reported that it is already difficult to understand how SEND funding, including EHCP-related funding, is being used in practice or whether allocated resources are directly reaching the children they are intended to support. Families stressed the importance of transparency around how SEND funding is allocated, what provision it is funding, and how its impact is monitored and evaluated.

Parents felt that accountability should go beyond written policies, inclusion strategies or paperwork alone. There needs to be meaningful evidence that support is actually being delivered and improving outcomes for children and young people. Families highlighted that success should be measured through tangible indicators such as improved wellbeing, attendance, inclusion, participation, reduced exclusions, positive family feedback and meaningful educational and developmental progress, rather than simply whether funding has been allocated or staff have attended training.

There were also concerns about the practical realities of schools delivering increasingly specialist support through Individual Support Plans while already facing workforce pressures. Parents highlighted that expecting mainstream staff to deliver complex therapeutic, behavioural or specialist interventions without additional staffing, protected time, specialist supervision or training risks creating an unsustainable burden on schools and staff. Families worried this could result in support existing in theory within plans, but not being consistently or safely deliverable in practice.

Parents also feared that these changes could increase conflict between families and schools. Many families already experience difficult relationships when trying to secure support for their children, and there were concerns that placing greater control of SEND funding within schools could intensify disputes around provision, thresholds and available resources. Families stressed that positive, trusting relationships between parents and schools are essential to children's wellbeing and educational experiences, and reforms should avoid creating systems that place families and schools in opposition to one another.

Overall, parents felt that while mainstream schools need sufficient resources to support inclusion effectively, any increase in direct SEND funding within school budgets must be accompanied by strong independent oversight, transparent accountability, adequate staffing and clear safeguards to ensure decisions remain focused on children's needs rather than financial pressures.

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?

- Pooled funding and specialists, equating to shared expertise and resources
- Diluted accountability
- Unclear responsibilities
- Difficulty establishing accountability where multiple schools are involved

Parents recognised that pooled funding and local SEND groups could offer opportunities for collaboration between schools, enabling shared expertise, specialist input and more efficient use of resources across a local area. In principle, this could support consistency of provision and help schools learn from one another, particularly where strong inclusive practice already exists.

However, significant concerns were raised that pooled arrangements could risk diluting accountability if clear structures are not in place. Where responsibility is shared across multiple schools or trusts, families feared it may become unclear who is ultimately responsible for ensuring that a child's support is delivered, reviewed and improved when needed. Parents stressed that without clear lines of responsibility, there is a risk that accountability becomes fragmented and harder for families to challenge when things go wrong.

Families also highlighted that clarity of responsibility is essential not only in theory but in day-to-day practice. Parents expressed concern that where provision is not working effectively, families may be left navigating between different schools, trusts or local group structures without a clear decision-maker. There were worries that this could lead to delays in resolving issues, with children's needs not being met while responsibility is disputed between organisations.

Related concerns were raised about the potential for inconsistency in SEND practice across schools within pooled arrangements. While some schools already demonstrate strong inclusive approaches and effective SEND support, families feared that others may be less engaged or may continue to avoid responsibility, particularly where accountability is less direct. Parents emphasised that collaboration must not create space for variation in practice that disadvantages children depending on where they attend school.

Families also warned against situations where children become caught between systems, particularly where schools or trusts disagree over funding responsibility for higher-cost or more complex provision. Parents stressed that children and families should not be left waiting for support while decisions are made between organisations about who should fund or deliver it. Clear, timely decision-making processes are essential to prevent delay and ensure continuity of support.

Finally, parents stressed that pooled funding arrangements must not replace statutory duties or weaken individual entitlement to support. While collaboration between schools can be positive, it must operate alongside, not instead of, clear legal responsibilities. Strong safeguards are needed to ensure that accountability

remains transparent, enforceable and focused on the needs of the child, rather than being influenced by budgetary negotiations between settings.

Q33. How should disagreements within SEND groups be resolved?

- Independent mediation
- Clear escalation routes
- Transparent decision-making
- Timely resolution
- Parent involvement

Disagreements within SEND groups should be resolved through clear, consistent and independent processes that ensure fairness, transparency and timely decision-making for families. Parents emphasised that where multiple schools, trusts or partners are involved, there must be a structured and accessible route for resolving disputes so that children are not left waiting for support while disagreements are ongoing.

Independent mediation was seen as essential to ensure that disputes can be resolved impartially, particularly where local arrangements may involve organisations with a direct interest in the outcome. Families stressed that mediation should be accessible, well-resourced and used early, before disagreements escalate and impact on a child's provision.

Clear escalation routes are also vital, with families needing to understand exactly how and where to raise concerns if issues cannot be resolved at school or group level. Parents highlighted the importance of a straightforward, well-publicised process that does not require navigating multiple layers of internal systems before reaching an independent resolution.

Transparency in decision-making was another key requirement. Families want clarity about how decisions are made, who is involved in the process, and what evidence is being used. Parents stressed that lack of transparency currently contributes to mistrust and inconsistency, and that clearer decision-making processes would help improve confidence in the system.

Timely resolution was also strongly emphasised. Parents noted that delays in resolving disagreements can have a significant negative impact on children, particularly where support is time-sensitive or where provision is already not being delivered. Families stressed that disputes must not be allowed to prolong uncertainty or delay access to appropriate support.

Meaningful parent involvement was highlighted as a core principle throughout the process. Families should be actively included in discussions and decision making, not only informed of outcomes once decisions have been made. Parents emphasised that their lived experience and understanding of their child's needs is essential to reaching fair and effective outcomes.

In addition, families strongly stressed the importance of external and fully independent complaints and appeals processes. They expressed concern that where disputes are handled solely within local systems, there is a risk of conflicts of interest, particularly where organisations involved in the disagreement are also responsible for making decisions. Parents felt that truly independent routes of challenge are essential to ensure fairness, maintain trust, and provide reassurance that decisions are not influenced by internal pressures or organisational interests.

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

- Clear purpose and outcomes
- Meaningful joint commissioning across education, health and social care
- Strong leadership
- Data-informed decisions
- Regular reviews
- Inclusive stakeholder involvement
- External oversight

Local partnership groups should have a clear purpose focused on improving outcomes for children and young people with SEND, with shared expectations across education, health and social care. Parents stressed that without clarity of purpose, there is a risk that groups become focused on system management rather than improving children's lived experience.

Clear, measurable outcomes are essential, including evidence of whether children are receiving the support they need, whether interventions are being delivered consistently, and whether needs are being met early enough to prevent escalation. Families also emphasised the importance of combining quantitative data with lived experience to understand what is working in practice.

Effective joint commissioning was seen as important, but must lead to genuinely integrated services rather than parallel working. Strong leadership is needed to ensure consistency, accountability and a clear focus on inclusion and delivery rather than coordination alone.

Decision making should be informed by both data and qualitative evidence, with regular review cycles to ensure services remain responsive and issues are addressed early. Parents also stress the importance of meaningful stakeholder involvement, particularly through Parent Carer Forums and young people, with clear evidence of how their feedback shapes decisions.

External oversight is highlighted as essential to maintain transparency and accountability. Parents stressed that collaboration must not dilute responsibility, and that clear lines of accountability are needed so that delivery does not become fragmented across multiple agencies or groups.

Overall, parents emphasised that while collaboration is important, it must be balanced with strong accountability, transparency and independent scrutiny to ensure the focus remains on improving outcomes for children rather than managing systems.

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

- Parent Carer Forums
- Parents and young people
- Schools and colleges
- Health professionals
- Neurodiversity and mental health specialists
- Local authorities including SEND Education and Social Care teams
- SEND charities and advocacy organisations
- Voluntary sector organisations
- Youth centres and youth organisations

Successful local partnership groups should include a wide range of stakeholders to ensure both professional expertise and lived experience inform decision making. These should include Parent Carer Forums, parents, children and young people, schools and colleges, local authority SEND and social care teams, health professionals, neurodiversity and mental health specialists, SEND charities, advocacy organisations, voluntary sector providers, youth organisations and youth services.

Parents strongly emphasised that Parent Carer Forums must be embedded as strategic partners rather than used as a consultation 'add on'. PCFs should bring anonymised lived experience from families and have a meaningful role in shaping and scrutinising local SEND strategy, including assessing whether decisions are improving outcomes for children and young people in practice.

Families and young people must also be centrally involved, with their voices heard in accessible and meaningful ways. Parents stressed that participation should not be symbolic, but should actively influence decision making and system design.

It was also highlighted that professional expertise is essential, particularly from health, education, neurodiversity and mental health specialists, alongside commissioners and local authority SEND and social care teams. However, this expertise must be balanced with lived experience to ensure decisions reflect the realities faced by children and families, not just system perspectives.

SEND charities, advocacy organisations, voluntary sector groups and youth organisations were also identified as important stakeholders, providing additional insight, support and challenge to ensure inclusive and equitable decision making.

Importantly, parents stressed that effective partnership working depends on stakeholders having genuine influence, including the ability to shape decisions and commit resources. Without this, there is a risk that groups become discussion forums rather than mechanisms for real change.

Overall, families emphasised that meaningful collaboration requires shared power, clear accountability and equal weighting of lived experience and professional expertise to ensure decisions lead to tangible improvements for children and young people.

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

- Regular cross-sector meetings
- Meaningful coproduction with families and parent representatives
- Cultures focused on helping all children succeed
- Transparency in performance
- Ensuring collaboration leads to real delivery and accountability

Stronger collaboration and a culture of improvement through local SEND strategic plans depends on consistent cross sector engagement, shared accountability and a clear focus on outcomes for children and young people. Parents highlighted the importance of regular meetings between education, health, social care and other partners to ensure ongoing alignment and shared responsibility for delivery, rather than isolated or fragmented working.

Meaningful co-production with families and Parent Carer Forums was seen as essential. Families stressed that their lived experience should directly inform strategy development, implementation and review, with clear evidence of how their input has influenced decisions and service design. Co-production should be embedded throughout the process, not limited to consultation at the end stage.

A strong culture focused on inclusion and enabling all children to succeed was also identified as key. Parents emphasised the importance of shared values across services, with a commitment to early identification, accessible support and removing barriers to participation in education.

Transparency in performance was highlighted as critical to building trust and enabling improvement. Families want clear, accessible data showing how the system is performing, including whether children are receiving support in a timely way and whether outcomes are improving. This should include evidence from lived experience alongside quantitative measures.

Parents also stressed that collaboration must lead to tangible delivery and accountability. Strategic plans should not remain aspirational but must clearly set out priorities, baseline data, actions, timescales, named responsibilities, funding information and measurable outcomes. Families also emphasised the need for plans

to demonstrate how improvement will be achieved across key areas including early identification, mainstream inclusion, specialist provision sufficiency, Alternative Provision, post-16 pathways, EOTAS, health input, social care support and transitions.

Families also stressed that local SEND strategic plans must not sit in isolation from wider financial or recovery programmes. There is concern that if inclusion and provision are driven primarily by budget pressures, this could lead to reduced or delayed support, ultimately increasing long-term costs across mental health services, safeguarding, Alternative Provision, EOTAS, adult social care, legal challenge and wider family impact, including parents leaving employment to manage unmet need.

Overall, parents emphasised that collaboration will only be effective if it leads to visible change in practice. Systems must demonstrate that they are learning from failures, improving delivery and ensuring that sustainability is achieved through early support, sufficient provision, compliance and quality, rather than through cost reduction or restricted access to support.

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

- Simple and accessible guidance
- Clear system pathways
- Independent advice services
- Consistency across local areas
- Both digital and in-person access
- In-person with direct point of contact needed for families, to help understand / navigate information, to feel heard, supported

Families need simple, accessible and consistent information alongside clear pathways through the SEND system. Independent advice services, digital resources and face-to-face support should all be available. There also needs to be recognition that simply having information on a website, does not give parents the tools needed to access it – many families are unable to access information in this way with a need for in-person/ direct contact and individualised support. There are families who have English as a second language, a strong proportion of parents who have a disability or mental health need themselves and those who do not have access to technology and the literacy/ability to navigate, absorb and act on the information provided. There is a worrying concern from families that access to specialist support is being replaced by static information points – websites and online hubs in which information and advice exist but not in a specific way tailored to their child with limited interaction.

Also, parents stressed that barriers are often caused not by lack of information but by support not being delivered consistently or enforceable. Understanding the

system does not help families if provision cannot be relied upon.

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.

- Expertise valued but equally independence

Parentsactive agree that including SEND expertise, such as a SENCO or other specialist, on a school complaints panel could help improve understanding of complex SEND issues and ensure that decisions are informed by professional knowledge of SEND support, provision and reasonable adjustments. This was seen as particularly important where complaints involve nuanced decisions about support, assessment, or the implementation of Individual Support Plans.

However, families also stressed that independence is equally important to ensure fairness and maintain trust in the process. While specialist input can add value, parents expressed concern that if the specialist is closely connected to the school or setting being complained about, there is a risk of perceived or actual conflicts of interest. This could undermine confidence in the impartiality of decisions and reduce trust in the complaints process overall.

Families highlighted that SEND complaints often involve disagreements about whether appropriate support has been provided, or whether a child's needs have been correctly understood and met. In these situations, parents felt it is essential that the decision-making panel is clearly independent from the setting involved, to ensure that outcomes are seen as fair, balanced and not influenced by internal relationships or institutional pressures.

Overall, parents supported the principle of expertise being included in complaints processes, but only where it is balanced with genuine independence. They emphasised that any model must ensure both informed decision-making and clear separation from the organisation being complained about, in order to maintain confidence, transparency and trust in the system.

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?

What's missing from the reforms and consultation -

Genuine consultation: Parents raised significant concerns about elements of the reforms which appear to have already been decided without meaningful consultation. Many felt this undermines confidence in the process and does not reflect the principle of 'nothing about us, without us' that families were led to believe would underpin the reforms. While parents broadly support ambitions around earlier intervention, inclusion, improved consistency and higher standards, many also highlighted that these principles already exist within the current framework of the Children and Families Act and SEND Code of Practice. Parents noted that while dispute resolution is referenced, the consultation does not clearly set out and address proposed changes to SEND Tribunal powers, enforceability or appeal rights, despite these being the primary accountability mechanisms families currently rely on. The core concern from families is that the reforms appear to move away from legally enforceable, needs-led provision towards a more restricted and standardised system that could reduce access to specialist support for vulnerable children and young people.

Health: Parents repeatedly highlighted the lack of detail around how the proposed system would operate in practice, particularly regarding how education, health and social care services would work together within the new framework. Families expressed concern that, despite health needs being central to many children's experiences, there is insufficient clarity on how health provision would be integrated, commissioned, delivered and monitored under the proposed system. Parents were worried that responsibilities between services remain unclear and that, without clear accountability and enforceable duties, families may continue to face fragmented support, long waiting times and the burden of repeatedly coordinating services themselves. There were also concerns about how health interventions would connect to Individual Support Plans and Specialist Provision Packages in practice, particularly where children have complex needs spanning both education and health. Families stressed that without a genuinely joined up and clearly defined system, there is a risk that important provision could become inconsistent, delayed or difficult to access.

EOTAS: There were also concerns that the reforms do not sufficiently recognise that mainstream settings are not suitable for all children and young people, including many pupils whose needs cannot be safely or effectively met in mainstream environments. Families questioned how access to specialist, alternative provision and EOTAS (Education Otherwise Than at School) would work if EHCP eligibility becomes linked to predefined Specialist Provision Packages accessed through schools. Parents strongly stressed that inclusion should never result in reduced access to specialist support for children who genuinely require it.

Mental Health: Parent carers have also highlighted concern that the consultation does not adequately reflect the impact of mental health conditions on children and young people's learning and development. This includes conditions such as school-

and system-related trauma, complex PTSD, autistic burnout, clinical depression and obsessive compulsive disorder (OCD), all of which can significantly affect engagement with education and access to support.

Beyond Statutory school age: Although the SEND Reform Consultation sits within a Schools White Paper and is therefore primarily focused on statutory school aged children, parent carers feel that early years and post-16 provision are not sufficiently addressed. In addition, there is concern that Preparation for Adulthood across all stages of education is not given enough prominence within the proposals.