

## Response ID ANON-2CDF-M3X2-9

Submitted to SEND reform: putting children and young people first  
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### About You

1 What is your name?

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3 Are you happy to be contacted directly about your response?

Yes

### About You

4 Are you responding as an individual or on behalf of an organisation?

Organisation

5 If you are responding as an individual, how would you describe yourself?

Not applicable – Responding as an organisation

6 If you are responding on behalf of an organisation, which of the following best describes who/which part of the sector your organisation represents?

Organisation – Representative organisation or trade association

If 'other,' please specify your organisation type::

7 What is the name of your organisation?

Please respond below::

NNPCF London Region

8 What is your role within the organisation?

Please respond below::

Director

### About You

9 Would you like us to keep your name and/or organisation confidential?

Please select one answer in each row - Name (if responding as an individual):  
Not applicable

Please select one answer in each row - Organisation (if responding on behalf of an organisation):  
No

10 Would you like us to keep your responses confidential?

No

If yes, please explain why you consider it to be confidential.:

### Executive Summary

1 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?

Please comment below::

Co-production needs to be embedded in all aspects of decision making relating to SEND and become more than just a tick box exercise which too often involves performative processes and no meaningful influence on how services are designed and resources utilised.

We need:

- standardised definition
- clear expectations
- realistic timelines
- adequate resourcing
- meaningful accountability

Children, young people and their families and Parent Carer Forums must be respected and equal partners in both the planning of support for those most affected by decision making at local, regional and national level.

Updates to the SEND Code of Practice must include clearer expectations around strategic co-production and mandate that a parent carer's expertise in their own child (or a young person themselves) has equal weight in decision making with professional views.

It is important that the views of parent carers and children and young people are balanced and that services take account both of what is important to children and young people and what is important for them.

There needs to be investment to support and enable children and young people to share their views and experiences and accountability to ensure that this influences decision making. This needs to be available to all children and young people including: those without EHCPs, children and young people that do not typically communicate via speech, those with learning disabilities and CYP that are not in school/NEET.

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

Please respond below::

Care needs to be taken when building an evidence based system as the quality of 'evidence' can vary and even in the best cases does not mean 'works for all.'

Learning from the implementation of the Best Start 'menu' of interventions and listening to Local Authority colleagues, practitioners and parent carers is key in ensuring a balance between reliable, tested interventions and provision and allowing practitioners to be creative when the evidence based offer is unsuitable or ineffective.

The current direction of travel risks an inflexibility that would leave some children, young people and families excluded from support and inhibit innovation and diversity of thought. Locally developed practice may not have the evidence base of a programme with a wider roll out, but if it has been proven to work for families it shouldn't be excluded from the school or local area offer.

Children who's needs different from the majority cohort (both universal or SEND cohort) will be marginalised and poorly supported if SEND support is based exclusively on practice with a widespread evidence base.

Part one: putting children and young people first

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

Please respond below::

We asked PCFs to reflect on their experiences as part of the PINS project and feedback what they felt the deciding factor was in making a school genuinely inclusive. Their answer was "the culture and ethos of the school as determined by the attitudes and behaviour of the senior leadership team." We need meaningful support for school leaders coupled with rigorous accountability and clear expectations for them to be the drivers and enablers of inclusion in their schools. This starts with an honest evaluation of each education setting's starting point, an ambitious but realistic plan for change and assurance that central government will provide the motivators and enables for change. Schools need well trained staff and more of them. Co-development and quality assurance of whole school training with parent carers and system partners is key as is an evaluation methodology that is separate from the OFSTED inspection process.

We need make partnership with parents the expectation rather than the exception and rebalance the power dynamic to allow parent carers to be part of each school's strategic decision making for SEND. The PINS 'mini forum' model supported by the PCF network would be an effective way of achieving this as would the expectation that Inclusion Statements, Strategies and Inclusive Mainstream Funding budgets are co-produced with parent carers.

Parent carers are hopeful about the promise of whole school inclusion, the universal offer is the foundation for this.

4 How can we ensure that children in the Targeted layer are best supported?

Please respond below::

Consider individual learning plans for all children (Children's Commissioner's recommendation) instead of Individual Support Plans for some children to avoid cliff edges and 'othering' of SEND. This removes potential conflict/gatekeeping and moves the focus from 'does this child meet the threshold for an

ISP?' to 'what does this child need to thrive in our school?'

Identification of needs is key, all staff need to be trained to spot emerging needs and be enabled to meet them.

Parent carers must be viewed as trusted partners with expertise in their child valued equally with professional views. Children and young people's voices must be heard and shown to meaningfully influence decisions about their own care and support.

Conflict of interest must be robustly managed. Parent carers are concerned that where identification of a need confers a legal and financial obligation for the school to issue an ISP to meet that need, that schools will be disincentivised to be curious and proactive.

There must be external oversight and dispute resolution for ISPs that does not rely on a setting's internal complaints process. One of the clearest messages that we heard from parents carers was that they did not have confidence in the impartiality and effectiveness of internal complaints processes. They also felt that this dispute resolution route would increase conflict between the very families that schools need to work in partnership with to ensure the best outcomes for CYP with SEND.

## 5 How can we ensure that children in the Targeted Plus layer are best supported?

Please respond below::

The success of the targeted plus layer relies heavily on the effectiveness of whole school SEND and inclusion training, the EAH offer and the development and staffing of support bases.. Please see further comments in questions 18-20.

Success also relies on the ability of the system to respond when needs change/escalate and/or targeted support proves insufficient to meet them. Lived experience of the Balanced Model (and similar) is that moving between universal, targeted and specialist tiers can be extremely difficult. Partly because the expertise needed to identify and quantify more complex needs isn't always accessible in universal/targeted tiers and also because there are assessment barriers (ISPs and EHCPs in this case) to pass through before the next tier of support can be accessed.

It looks great on paper, however lived experience is often that CYP get 'stuck' in a tier and stepping up (and sometimes down) support is difficult to impossible.

Resource always tilts towards statutory duties, especially where there are budgetary and staffing pressures. Inconsistent support is one of the drivers in preventable escalation of needs for CYP that are effectively in the targeted layer of support in the current system.

## 6 How can we ensure that children in the Specialist layer are best supported?

Please respond below::

- Access to a specialist placement best able to meet their needs.
- Sufficiency of specialist placements and practitioners.
- Personalised provision detailed in an EHCP and developed with CYP, parent carers and experts in SEND
- A genuinely graduated response that allows timely access to specialist provision without un-necessary delays, systemic barriers and does not rely on the ability of a parent carer or young person to self-advocate.
- Impartial advice and support to resolve issues quickly when concerns or disagreements arise.
- Scaffolding for the family to ensure that they have access to the training, support and practical help they need.

### Part one: putting children and young people first

## 7 How do you think early years settings, schools, and colleges can best support the mental health and wellbeing of children and young people?

Please respond below::

By providing environments that are emotionally and physically safe for children and young people with SEND.

Safe people: a key staff member that checks in regularly and is available to support if needed. A school culture that prevents and tackles bullying, stigma, discrimination and genuinely includes everyone. The ability and willingness to be flexible to meet the needs of individual children, even when that doesn't concord with established school practice or policy.

Safe spaces: sympathetic sensory environments for those with sensory processing differences and sensory impairments, physically accessible spaces for those with reduced mobility.

The lived experience of children and young people in school/college must align with the 'theoretical' message that they hear about the importance of kindness and self-care – too frequently it doesn't for CYP with SEND. All staff working with children with SEND, care experienced children and those with refugee status must be trained in trauma informed practice.

Minimum standards for MHSTs must include a clear offer for children/young people experiencing barriers to attendance, those with communication differences and developmental delay/learning disabilities.

## 8 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.

Please respond below::

There were mixed views about this with some parent carers feeling strongly that the current areas of need should not be changed, some parent carers feeling that the proposed areas of development were an improvement and some parent carers who were unsure. Almost all parent carers that we consulted with did not agree with Mental Health being omitted from areas of need/development and the importance of mental health support was one of the strongest recurring themes that we heard. There was also concern around the potential loss of interaction in the broad areas of need/development.

In discussions with system partners we have found that there is confusion around why children and young people with the same headline diagnosis (e.g. ADHD) have needs and provision listed under different Areas of Need. For us this highlighted the need for better support and training, particularly for education partners to understand how the same condition or developmental difference can vary significantly in its presentation for individual children. The Areas of Needs exist to ensure that support is tailored to the individual child/young person and is needs led, not diagnosis driven. Therefore we do not agree that the refreshed areas of development will support educators because categorisation is not the fundamental issue.

9 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?

Please respond below::

Where agencies fail to work in partnership budget pressures and conflicting priorities are usually the cause. This leads to short sighted resource allocation, poor value for money overall and worse outcomes for children and families. Mandating of pooled funding forces partnership working and should be considered for SEND in the early years in each local area.

The SEND specialist role in Family Hubs will be key and act as the glue on the ground, offering a trusted listening ear, supporting parents, and connecting families into the right support. This role must be delivered through a team-based approach, ensuring it is not a single point of failure and that families experience continuity and consistency. Similarly, the model should include more than one SEND specialist, ensuring shared responsibility, resilience, and consistent access to expertise without delays or bottlenecks.

Some parent carers are concerned that SEND support can become diluted within a universal Family Hub model and expressed a preference for a targeted, specialist SEND Specialist Hub in each local area in addition to the universal offer. SEND Specialist Hubs would bring together Education, Health, Social Care, and the Voluntary and Community Sector within a child-centred environment, including leisure space for activities SEND-friendly physical and sensory environment.

SEND navigators, champions, PCFs and other parent led groups will be instrumental in supporting the Early Years offer for SEND.

10 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.

Please respond below::

All parent carers must be supported in their journey to acknowledge, identify, accept and support their child or young person's condition or difference. A Family Hub model that relies only on dedicated services and facilities for families with SEND could miss opportunities to support CYP with emerging needs or families that experience greater barriers to accessing support (e.g. cultural stigma around SEND). There needs to be a mix of dedicated provision for families with SEND and support embedded in the universal Family Hub offer.

Statutory services such as the Health Visiting Team should engage with children and families as part of universal Family Hub offer (e.g. stay and play sessions) and provide an alternative to the typical 'front door' that is a barrier to parent carers who have mistrust of authority or cultural background that is less accepting of difference and disability.

The importance of play in emotional bonding, identifying differences and delivering intervention should not be underestimated and each Local Area Family Hub network should include a Portage service and play therapist.

## Part one: putting children and young people first

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

Please respond below::

Children not in school – where are the success stories from EBSNA, EOTAS and EHE that focus on holistic outcomes and not just reintegration and attendance?

Effective success measures for CYP that do not include attendance and academic attainment (e.g. Warwick Edinburgh Mental Wellbeing Scale)

Analysing the outcomes for Post 25 cohorts and reflecting back on the journey - what worked, what didn't and what do we need to learn from?

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

Please respond below::

Developmental Language Disorder is one of the most commonly occurring but least understood special educational needs. Pre-teaching of vocabulary is essential to support CYP with DLD to succeed, however few teaching and support staff understand how to do this in a way that builds pathways to vocabulary retention and recall.

Working in partnership – supporting CYP with SEND effectively involves working in partnership with parent carers, children and young people and external agencies. Training to understand duties and practical strategies to enable co-production are necessary for all school staff.

Equality Act 2010 (EA) – mainstream inclusion regularly fails because of refusal to implement low cost, high impact reasonable adjustments for children with SEND. Many school leaders and staff do not understand their legal obligations under the EA e.g. definition of disability and which CYP it applies to.

Accessible communication for those with SLC differences, learning disabilities, sensory impairment, SPLD and EAL (e.g. CA UK, BSL, Braille for the sighted)

Behaviour as communication – when CYP cannot articulate their distress they communicate it in different ways. Educators and caregivers need training to learn different ways of listening.

Emotional Regulation – for children and young people but primarily for staff. As care givers and educators of frequently dysregulated children and young people our own emotional regulation must be exceptional in high stress situations.

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

Please respond below::

Realistically this cannot be achieved without increasing the number of support staff in our schools and colleges. School leaders, SENCOs and teachers already struggle with unmanageable workloads. If we want to ensure that school staff have protected time for SEND and inclusion training, to take on more responsibility for identifying needs, planning provision and documenting progress, to understand their obligations and work in partnership with parents schools will need more revenue funding to employ more staff.

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

Please respond below::

The role of the SENCO is crucial in achieving genuinely inclusive educational settings. Too often SENCOs do not have enough time to fulfil all aspects of their role, have competing professional responsibilities and/or do not have the respect or decision making power to influence how support for SEND is resourced and implemented. To be truly effective in their role the SENCO role needs to evolve as follows:

- Dedicated role without timetabled or 'cover' classroom teaching or other responsibilities (e.g. Assistant Headteacher)
- SENCO FTE proportionate to the size of setting and incidence of SEND (e.g. large schools or those with higher than average incidence of SEND have more than one SENCO or an assistant SENCO)
- NPQ training beginning immediately upon taking the role, ideally in progress or achieved before with multiple staff holding the qualification (e.g. Headteacher and not just the SENCO.)
- Protected CPD time with progression expected once NPQ is achieved
- Meaningful influence over policy decisions and budget allocations in their school.
- Larger MATs to have a Trust SENCO to oversee SEND practice and resourcing across the Trust
- Local, regional and national SENCO networks to provide support, share expertise, provide constructive challenge and feed back to local and central government about key issues (e.g. emerging trends, successes and challenges) to inform policy and resourcing.

Part two: new Targeted and Targeted Plus support that is written into law

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

Please respond below::

An ISP would only provide assurance if it:

- Specifies methodology used for identifying needs
- Includes specialist and therapeutic provision as advised by specialist teachers, SALT etc
- Specifies measurable outcomes
- Is regularly reviewed
- Is developed in co-production with parent carers and the child or young person
- Includes a clear right of redress or appeal
- Has an external oversight and quality assurance process

Participants were concerned that without statutory enforceability, ISPs may become advisory documents lacking practical value and that a limited legal duty will motivate schools to 'get it done' rather than 'get it right'. There is also potential conflict of interest where schools are responsible for identifying and meeting needs without any additional funding to make provision attached to the ISP.

The voice of the child or young person should be clearly heard in the Plan. ISPs should be written in plain English that is free from jargon so they can be easily understood by the child or young person, parent carers and non-specialist staff.

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

Please respond below::

A national, regional or local area digital template would allow systems to track emerging needs more effectively than they currently can and forecast future need for provision and placements more accurately.

ISPs should avoid using primary needs data and clearly link what the identified need (not diagnosis) is, what provision is needed to support that need, what the target outcome is and how/when progress will be measured.

17 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?

Please respond below::

PfA needs to start at the earliest possible stage and follow the interests and strengths of the child or young person. Families and key staff should be supported to make connections with potential settings and placements well in advance of transition points. The system also needs to 'look ahead' much further than it currently does to commission provision and placements (including supported internships and support living placements) based on interests, aspirations and strengths of the child or young person.

Supported transition requires:

- Dedicated resources and minimum standards for transition planning
- Clear pathways into FE, training and employment for all young people
- A diverse Post 16 offer that meets local need
- Clearer, earlier information for families including differing thresholds to access children's and adult mental health and social care services.
- Continuity of support and dedicated transition support roles when moving to adult social care or stepping down from Children's Social Care

The importance of the transition to secondary should not be overlooked in the PfA agenda. Poorly supported transitions into KS3 often result in placement breakdown, children out of school and mental health crises. When this happens it is unlikely that young people will be ready for their Post 16 transition, more specialist support is likely to be needed, and there is a higher likelihood of a child or young person not achieving expected outcomes and of becoming NEET.

Part two: new Targeted and Targeted Plus support that is written into law

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

Please respond below::

Quality assurance of inclusion Bases must include:

- National minimum standards
- Specialist staffing and ringfenced budgets
- Clear eligibility criteria for children and young people places in Bases
- Independent oversight with commissioning approval from DfE, LA, ICB and PCF

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

Please respond below::

Considerable care must be taken in the development of Specialist Bases in mainstream settings, in secondary schools especially. While some parent carers have told us that their children with moderate learning disabilities have been well supported in mainstream primary SRPs and ARPs, other parent carers have told us that they regret not moving their child to specialist placements earlier and feel that this delayed the development of their independence skills.

We are also concerned about the cost and value for money in establishing specialist bases in mainstream settings. Satellite and 'pop up' specialist provisions to mitigate sufficiency issues often attract higher costs and greater staffing challenges because economy of scale cannot be achieved. There is also the social context – in a specialist setting children and young people have a wider group of developmental peers, whereas in specialist base the cohort would be small and children and young people could feel isolated.

Where a mainstream placement is the choice of the young person or parent carer this be supported. Specialist bases would enable mainstream inclusion for more children and young people.

We must consider if mainstream is a safe and suitable environment for some children and young people because of incidents of assaults and abuse involving children with complex needs in mainstream schools that members of our PCF network are aware of.

20 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?

Please respond below::

Parent carers in London generally agree with the principal that faster, easier access to specialists and expertise would improve outcomes for children and young people with SEND. Parent carers are however concerned that there are not sufficient qualified or experienced practitioners available to deliver this service in reality. ICB restructure is also a considerable challenge when trying to plan and deliver service transformation for SEND.

- A needs based service plan – what are we trying to achieve/change?
- Local Area skills audit – who do we have to deliver the offer?
- Workforce development – how do we grow our own?
- Knowing our cohort - Accurate data to understand local need and a plan that balances statutory and non-statutory support.

While there has been excellent practice in some local areas, generally parent carers and Parent Carer Forums feel that their expertise in SEND is being overlooked and undervalued in the planning of the Experts at Hand offer. We asked parent carers if they wanted to be delivery partners and 85% think that parent carers should be involved in developing and delivering training to schools, families and practitioners with some indicating that they would like to train as a practitioners themselves. In a recent workforce study LIA found that 34% of respondents were parent carers and over 50% had lived experience of SEND. We need to actively recruit and train our parent carer community and our young people with lived experience of SEND.

### Part three: specialist support for those with complex needs

21 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?

Please respond below::

Mandatory budget pooling for education, social care and health commissioning to avoid the wrestling we too often see between statutory bodies trying to avoid funding high cost placements for children and young people with complex and/or less commonly occurring or intersecting needs. Some local areas in London already do this effectively.

Regional and subregional commissioning and increased funding for Regional Innovation and Improvement Alliances to support regions to achieve quality, sufficiency and value for money in commissioning of placements

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

Please respond below::

Many parent carers do not feel that the proposed Specialist Provision Package model reflects the reality of being or supporting a child or young person with complex needs. The model does not take account of how the intersection of needs, family context and environment influence the type of care and support that is needed for a child or young person.

SPPs undermine what parent carers most value about their child or young person's EHCP - the personalisation of provision that is enabled via the current framework.

Parent carers generally do not view SPPs as either efficient commissioning tools or vehicles to access provision that will meet an individual child or young person's needs. While some parent carers felt that their CYP's needs could be captured in one or more of the proposed SPPs, most did not.

Ensuring fairness and equity is important, CYP with similar needs should be able to access similar levels of support regardless their family's individual circumstances or where they live. Digitised EHCP and ISP templates and improved SEN 2 data capture (e.g. moving away from primary need categorisation) would enable direct comparison locally, regionally and nationally of the provision accessed by CYP with similar needs. This data would support the development of national commissioning guidance and a costings framework that would be more effective in ensuring equal access than pre-determined packages of support that risk a 'one size fits no-one' outcome.

23 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?

Please respond below::

Individualised, enforceable provision that it developed in partnership with CYP and parent carers and is reviewed regularly.

24 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?

Please respond below::

We welcome the proposed 'fast track' EHCP assessments for children in the Early Years. We would recommend that this option is available at all ages and stages, especially where; there is a risk of placement breakdown, a child or young person is in mental health crisis or a disability is acquired due to injury or illness.

We must ensure that we remain ambitious for very young children and regularly review EHCPs at EYFS.

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

Please respond below::

- Parent carer evidence
- Child or young person voice

- Observations from the educational setting
- Professional assessments (e.g. SaLT, EP)
- input from any other service the CYP is known to

### Part three: specialist support for those with complex needs

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

Please respond below::

This does not have support from the parent carers we consulted with.

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

Please respond below::

Lived experience of other families

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

Please respond below::

We do not feel there needs to be a maximum time set for AP. Planned time scales should be decided at the start of the placement, taking account of individual needs in a robust reintegration plan that can also flex to align with a child's progress.. This should include reflection on what might need to change in the approaches of the original school and staff i.e. not just used with a view to 'reform' the child but a structured process which learns what the best support approaches are and integrates those into the 'home' setting. It must also be a pause for reflection on the suitability of the original setting.

While we do not recommend a fixed maximum time for AP placements, there do need to be safeguards against prolonged, inappropriate placements that may reflect lack of suitable or available alternatives.

29 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.

Please respond below::

There is general agreement across system partners that the rampant profiteering of private equity companies in the INMSS sector must be stopped. We also hear from parent carers and commissioners that some high cost placements do constitute good value for money, deliver excellent outcomes for children and young people and allow access to a unique or rare offer for children and young people with less commonly occurring needs and conditions. This is a nuanced issue and requires a nuanced response.

Parent carers also have concerns that a 'heavy handed' approach to spiralling INMSS fees could result in a mass exodus from the sector, abrupt closure of settings and very CYP and families when independent special schools have closed unexpectedly because of inadequate standards of care. Legislation to hold the INMSS sector to account should also consider the resilience of the rest of the SEND system to absorb the shock of unplanned withdrawal of specialist services and how risks will be mitigated (e.g. compulsory purchase orders, emergency absorption into established MATs)

The independent school sector school should not be overlooked in this conversation. It is providing a unique role for children and young people who need a less overwhelming sensory environment, smaller class sizes and the offer of a mainstream style education. The SEND reforms should consider how the best of this offer can be replicated in the maintained sector with equity of access and at reasonable cost.

### Part four: reforming the system to reward inclusion

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

Please respond below::

Inclusive Mainstream funding should be ringfenced and priorities should be co-produced with parent carers and children. Inclusive Mainstream funding must not be used for day to day support but transformation only and settings should publish how funding has been used in their Inclusion Statement/Strategy.

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

Please respond below::

There is broad agreement that schools need increased funding and staffing to effectively support children and young people with SEND. There is cautious agreement for settings to hold more SEND funding in their core budgets provided that:

- This is 'new' money and not drawn down from high needs budgets
- Funding is ringfenced
- Spending is monitored

- Accountability systems are robust
- Dedicated training budgets are included
- Early identification is prioritised

32 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?

Please respond below::

Yes

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

Please respond below::

By the Local Authority

#### Part four: reforming the system to reward inclusion

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

Please respond below::

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

Please respond below::

Parent Carer Forums:

- representative voices for the parent carer community (not just personal lived experience)
- strategic partners
- organisational memory (particularly important when faced with ICB restructure etc)
- See across the SEND system in a way that practitioners and professionals often can't
- Huge collective expertise across all areas of SEND

Parent Carers (Experts by Experience)

- Ground conversations in lived reality for families
  - Case studies delivered by parent carers themselves can be effective scene setting at the start of Board meetings and projects
  - Particularly important for parent carers from minoritised groups or who have CYP with less commonly occurring needs/presentations
- Children and Young People's Forums – nothing about us without us!

Local Authorities

Social Care

Short Breaks Providers

Health Commissioners

Health Providers

SENDIASS

Schools (School representatives tend to advocate for their individual setting rather than act as a representative voice for the sector or group. It is therefore important that there is more representation from education providers holding a wide mix of roles e.g. school leaders, SENCOs, Governors, MAT CEOs, Teaching Staff and TA's)

Voluntary Sector Partners

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

Please respond below::

Co-production, co-production, co-production. The timescales to produce the first iteration of Local Area SEND Reform Plans have undermined this principal and, in some instances enabled superficial, tokenistic and performative engagement that is not genuine co-production.

They have also sent a clear message that co-production with PCFs and the wider parent carers community is not optional, it is fundamental to reform and, perhaps for the first time there are tangible consequences for failing to work in strategic partnership with Forums and families. This messaging has given some Forums and parent carer communities a seat at the table that they haven't previously had and been instrumental in seeding the first green shoots of partnership working.

We need the Department for Education and Secretary of State to stand behind these messages and withhold transformation funding until Local Areas can clearly evidence that they are working in co-production with all system partners including an equal say for parent carers and children/young people about local reform plans and other decisions that affect their lives and access to support.

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

Please respond below::

We asked parent carers how they would prefer to access help to understand the new SEND system, to ensure that their child or young person was getting the right support or to resolve a dispute. Most parent carers (over 70%) preferred to access support via their local SENDIAS Service, second preference was a locally commissioned independent mediation service and third preference was the Local Authority. Some parent carers felt that the local offer website and Family Hubs could do a better job than currently in sharing useful information about SEND. Some parent carers also indicated that their local PCF was a preferred place to access information and support.

Commissioning of the SENDIASS network could be improved to avoid duplication of effort in creating information resources and hosting digital platforms. This would allow each local SENDIASS to devote more of their resource to personalising their offer to meet the needs of local parent carers and provide more intensive support to those that need it. Better systems that allow IAS services to share resources (e.g. translated webinars and presentations) would also improve the SENDIASS offer nationally and work towards meaningfully addressing barriers to accessing information and self-advocacy.

38 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.

Please respond below::

One of the strongest and most consistent messages that we heard from parent carers was that disputes about SEN provision in schools must be resolved by a body independent of the school or MAT. The inclusion of an independent SEND specialist on a school complaints panels is acknowledged as an improvement, however parent carers told us consistently that they did not have confidence in the school complaints process and felt strongly that pursuing dispute resolution via this route would increase conflict and undermine partnership working between families and schools.

Parent carers who also have experience as school governors felt that the combined expectations of the role school governors will play in quality assurance for ISPs, SEND and meeting medical needs are too high and would not provide meaningful or impartial oversight.

Parent carers were cautiously optimistic about the role that local school 'clusters' could play in resolving disputes and ensuring consistency across the mainstream offer provided that:

- Clusters are a partnership of schools, health commissioners/providers, Local Authorities and parent carers/PCFs
- Local Authorities have oversight of the clusters
- There is a clear escalation/appeal route if disputes are not resolved (e.g. Local Authority decision, independent mediation service)
- MATs do not have disproportionate influence and cluster with local schools, not just those within their Trust.

#### Part four: reforming the system to reward inclusion

39 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?

Please respond below::

Parent carers generally support the ambition of these reforms and overwhelmingly oppose proposed legislative changes that reduce duties, rights and redress in relation to SEND. We must ensure equity of access for all children including those that are care experienced and those that have parent carers experiencing financial and social disadvantage. We will not achieve this by frustrating the rights of those most able to leverage legal protections but with a properly functioning system that makes those legal protections the backstop they were supposed to be, not the front door to support they have become. We also need a representative workforce where families see themselves reflected, making services feel safer to access. This includes recruiting intentionally to ensure intersectionality of expertise, lived experience, neurodivergence, disability, minoritised ethnic and cultural groups and gender balance throughout the SEND workforce.

Gender inequality must also be addressed and have a dedicated strategy in any SEND reform plans including under-identification of neurodivergence in women and girls and diagnostic and assessment processes biased towards typically male presentations. The disproportionate burden carried by female carers of children and young people with SEND in relation to; administrative load, emotional and mental labour, mental and physical health impacts, and loss of independence, career and income must also be acknowledged and mitigated.