

## **SEN POLICY RESEARCH FORUM:**

### **LEAD GROUP RESPONSE TO WHITE PAPER/SEND CONSULTATION**

**15<sup>th</sup> May 2026**

#### **INTRODUCTION:**

In May 2024, the SEN Policy Research Forum published a framework for evaluating national SEND policy which set out required policy aims, the current picture and proposals for future development. This was organised around 6 key areas: Values; Curriculum, Assessment and Teaching; Funding; Support; Workforce Development; and Accountability. The commentary below summarises our view of the main positives of the current Government's proposals for each of the Framework areas, the key issues and our suggested ways forward.

#### **VALUES:**

##### **Positives:**

*Greater emphasis on inclusion and education for all*

- Strengthening the mainstream offer
- Thriving/belonging as well as academic attainment
- More recognition of the value of relative progress (Progress 8 etc)
- UNCHR commitment

*Collective responsibility for improvement*

- At strategic and local partnership level
- School groupings – potential for peer support/challenge/development of practice

##### **Issues:**

*No reference to SEND and inclusion in White Paper ambitions (p 105/6)*

- Still emphasis on improving attainment/reducing the disadvantage gap and attendance
- Weak commitment to SEND outcomes (eg Preparing for Adulthood)
- No vision for what things will look like in 10 years' time

*Limited coverage of why mainstream inclusion is desirable/beneficial*

Ambiguities about future role of special schools – emphasis on mainstream set against proposal for 60,000 new special school places (average = 400 per LA)

**Ways forward:**

More clearly stated ambitions/vision for SEND and what things might look like by 2034 and in the short/medium term

Clearer statement of why mainstream inclusion is important and how England will comply with UNCHR (removal of reservations?)

**CURRICULUM, ASSESSMENT & TEACHING:**

**Positives:**

Greater curriculum flexibility

Potential for greater diversity of learning pathways

Whole school approach – strategic planning for diversity of needs

Stronger commitment to SEND training being part of core teacher expectations

Opportunities for practice sharing

**Issues:**

Still potential for bolt-on eg new Progress 8 – tweaks or radical revision

No clear reference to importance of personal-social development

Limited coverage of SEND within curriculum review

Uncertainty about pupil entitlements within new ‘inclusion bases’ and parental rights re admissions

Limited information about status of SEND outcomes – eg how will they be represented in school Ofsted reports/league tables?

**Ways forward:**

Clearer account needed for how more inclusive approach will be embedded in practice

Need for greater range of positive examples, particularly at the secondary phase

Need for clearer approach to evaluation and accountability

## **FUNDING:**

### **Positives:**

Increased investment vs budget reductions

Investment in mainstream (non-statutory support)

- £1.6 billion
- Increased service support (Experts at Hand)

Shift to school level funding vs pupil-led

Greater transparency re notional SEND budgets and new additions

### **Issues:**

Continuing inequities in distribution of High Needs Block (HNB) to LAs

- Consequence of continuing use of historical factors, differing levels of overspend/deficits (now 'centralised'), Safety Valve and DBV
- No clear pathway to resolve

Proposed delegation of HNB to individual schools (and pooling) vs devolution to clusters

- Not sufficiently targeted
- Lack of clarity about what £1.6 billion is expected to cover (eg inclusion bases) whether it is sufficient
- Over-emphasis on capital funding (£3.7 billion) vs revenue/staffing
- Accountability?
- Motivation to pool?
- Lack of clarity about how 're-balancing' will happen (given that EHCPs expected to increase)

Preference of MAT groupings vs localities

- Varying size/geographical coverage of MATs
- Inclusion of non-MAT schools (before new requirement is implemented)

- Competitive culture between MATs (doesn't support local community responsibility)
- Variable record of MATs with regard to SEND and inclusion

### Specialist packages

- How decided (expected to precede EHCPs in process)?
- Definitions unlikely to be robust (particularly for 'internalising' and 'externalising' behaviour) so interpretation will be variable (Welsh experience)
- Perverse incentives if future HNB distribution to LAs is based on number/level of current/projected SPP commitments
- Implications for funding of specialist provision – viability of aggregation

### **Ways forward:**

Locality clusters vs MAT groupings with progressive 'safe' devolution to that level along with clear accountabilities/expected outcomes

Pilot approach with formal independent evaluation

Clear plan for achieving more equitable HNB distribution

Specialist provision funded on the basis of a clear description of what schools are expected to provide, along with associated external service inputs (therapy etc). National guidance plus better use of benchmarking to establish comparative spend/reasonableness.

### **SUPPORT:**

#### **Positives:**

Stronger strategic role for mainstream SENDCos

ISPs: more dynamic approach to meeting pupil needs; greater accountability for quality/implementation

Increased investment in external support service capacity (eroded over the years with increased administrative role and less targeting as a result of enforced trading)

Capacity for school groupings to invest further

#### **Issues:**

Potential for increase in administrative demands (increased statutory assessment requests before eligibility changes)

Evidence from Wales that thresholds (for ISPs/EHCPs) continue to be contested

ISPs:

- over-emphasis on individual support (vs groups/pathways): how manageable?
- over-dependence on digital/AI advice and support will not necessarily lead to better interventions or outcomes for children and young people

No real clarity on expected outcomes (eg what support services will be expected to achieve)

Potential for duplication between centrally commissioned and services traded with schools and clusters

Recruitment and retention issues

Limited ambitions with regard to locality working

### **Ways forward:**

Needs 'big idea' to move things forward. Locality clusters have some potential but needs proper piloting and evaluation (drawing on stakeholder experience)

Need to research and disseminate good practice examples (eg where things are working well in the Welsh system – if that is what the Government is seeking to follow)

## **WORKFORCE DEVELOPMENT**

### **Positives:**

Clear acknowledgement that professional development is key to improving the current SEND system and the proposed more inclusive model of provision

Commitment to fund a wide range of training initiatives for the education workforce

Recognition that the SENDCo role is strategic and must be underpinned by professional development that has a strong focus on leadership

Recognition that professional development should be aligned with a strong evidence-base (across the universal – specialist spectrum)

Professional development should utilise peer experience-knowledge and be of practical value to the education workforce

Acknowledgement that the NPQ review (in progress) will lead to programme revisions supporting all aspects of inclusive leadership (including SENDCo role)

Expert at Hand initiative recognises the need for mainstream school/setting focused advice and guidance whenever it is required. More funding to increase the advice and support available to mainstream schools/settings from educational psychologists (EPs), speech, language and communication therapists (SLCTs) and other specialist professionals

More systematic CPD to develop coherent and effective provision that links mainstream schools/settings, inclusion bases, and specialist settings (including alternative provision)

### **Issues:**

#### *General:*

Funding commitment may not be sufficient to address long-term workforce needs (across all sectors and phases of provision across the 0 to 25 age range)

Needs of the early years and post-16 sector workforce are not addressed in detail

Professional development for education support staff (including teaching assistants, learning mentors, behaviour support workers etc) not considered in sufficient detail (may be at risk if funding shortages)

Insufficient recognition of need for specialist training routes and requirements (eg sensory/physical needs; autism)

No reference to professional development (systematic/sustained) for local area SEND casework/assessment teams

No reference to the importance of equality training (e.g. 2010 Act, reasonable adjustments) or training for co-production with families/partnership with parents

No reference to contribution of Institutes of Higher Education (IHEs) to professional development; over-reliance on EEF as arbiter of robust research evidence as opposed to other sources (academic/voluntary organisations)

Lack of clarity about the role of the local authority in relation to key aspects of professional development (challenge, guidance and support)

Recommendations appear to address urgent gaps in training and professional development provision, but do not present a coherent model for workforce development that seeks to integrate service support for children, young people and families

### *SENDCos:*

Aspiration for an enhanced strategic leadership role for SENDCos does not address concerns about excessive workload demands for postholders.

Schools need sufficient staffing capacity to enable high-quality co-production if participation is to be authentic rather than symbolic. Without this, the current pressures on SENDCo workloads risk reducing participation to a procedural requirement instead of a genuinely meaningful process.

Strengthening mainstream inclusion depends on protected SENDCo leadership time, adequate administrative support and unambiguous expectations regarding the SENDCo's strategic function. Without these foundations, the layers of support risk operating as compliance mechanisms rather than catalysts for improved practice.

The reforms have the potential to substantially broaden the SENDCo remit, extending it to statutory oversight of ISPs, multi-agency coordination and the leadership of whole-school CPD. To prevent SENDCos becoming the public face of a rationed system, the role must be underpinned by statutory leadership status, protected time, administrative support and clear career pathways.

### *Support services/other:*

Lack of clarity about Experts at Hand, what roles will be involved; how they will be trained, what local area capacity will look like

No consideration is given to professional development for staff involved in the provision of support for children and young people who cannot attend school/settings and rely on EOTAS or other alternative provision in a local area.

No consideration of professional development needs for professionals working with children and young people in custody, or in training outside school or college

### **Ways forward:**

Workforce development proposals need to be framed within a coherent overall structure that is sustainable (long-term) and encompasses an integrated workforce (not just the education workforce, or narrow conceptions of this)

Articulation of workforce reach (sectors, 0 to 25 age coverage, roles) needs supporting with more detail/greater specificity

Detailed consideration of what is meant by inclusive pedagogy, is required – without this, content of professional development will be too narrow and reliant on a singular evidence base that will not work in practice

An impact assessment on the role of the SENDCo (in different phases of education provision), linked to addressing ongoing concerns about recruitment/retention/workload

Clearer role for IHE, and a range of other organisations is required - in relation to professional development and its research underpinnings (evidence base) - with a view broadening a landscape dominated by NPQs and the EEF

Clearer role of the local authority/area in supporting, challenging and guiding the future workforce needs clarification in relation to current and future capacity (eg. what local area level/type of staffing will be required to support schools/settings/SENDCos/hubs and trusts/groups/sectors and phases of education provision)

## **ACCOUNTABILITY:**

### **Positives:**

Shift to greater individual school level and MAT level accountability for SEND and inclusion

Inclusion as part of new Ofsted ‘report card’

Progress 8 measures to be reviewed

More explicit expectations of LA strategic leadership role

### **Issues:**

Insufficient examples of what ‘good’ looks like, at system or individual school level

Will be difficult to judge progress at school, LA or national level

Little clarity about how pupil and parent voice will be used at both system and individual child level (ISPs; use of inclusion bases, specialist packages etc)

Concerns about loss of statutory backstops when needs are not being met

Formal inspection unlikely to access sufficient detail (eg barriers to admission; ‘grey exclusions’). Need for systems that promote more active self-evaluation and constructive peer challenge at more collective level

Not clear how broader education priorities (personal/social; relative progress) will be embedded in inspection/evaluation approaches

Decreasing clarity around financial parameters and consequences of overspends

**Ways forward:**

Clearer vision for what Government is expecting things to look like if reforms are successful (ie not just reduction in EHCPs!)

More examples of positive practice and opportunities for schools, LAs and services to learn from each other (participative accountability)

Greater clarity around parental rights, expected partnerships with range of stakeholders and contributions to quality judgements

Better evaluation of SEND-related outcomes (beyond normative attainment), including long term