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A voice for families of children and young people with special educational needs and/or disabilities

SEND reform: putting children and young people first

Response to the consultation from Reading Families' Forum, May 2026

By email to SENDreform.CONULTATION@education.gov.uk

Our Parent Carer Forum is an independent charity run by and for families of disabled children and young adults aged 0 - 25 years. We are the statutory parent carer forum for the Reading Borough Council area. We represent over 400 member families and have over 1000 followers on social media.

PART A – About You

1. What is your name?

Dr Alice Carter

2. What is your email address?

(redacted for publication)

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

Yes

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?

N/a

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?

Other: Parent Carer Forum

7. What is the name of your organisation?

Reading Families' Forum CIO

Our Parent Carer Forum is an independent charity run by and for families of disabled children and young adults aged 0 - 25 years. We are the statutory parent carer forum for the Reading Borough Council area. We represent over 400 member families and have over 1000 followers on social media.

8. What is your role within the organisation?

Acting Chair and Treasurer

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

9a. Name: No

9b. Organisation: No

10. Would you like us to keep your responses confidential? No

PART B – Consultation questions

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.

We are very concerned about how accessible this consultation is for parents and carers.

The current SEND Code of Practice already explains how families should be involved in developing their child's EHCP, and that should not change. This consultation is not an effective way to gather families' views: it is too long, too complex, and it does not ask about many of the most important changes being proposed. Families are already exhausted from having to fight for their children and complete forms every day, so finding the time and energy to respond to yet another consultation is extremely difficult, especially when their views on key issues do not appear to be valued.

Families already have a genuine say in principle; the problem is that their views are not consistently respected or acted on in practice, and there are no consequences when this fails to happen. Families are being heard but not listened to: their voices are dismissed or ignored, timescales are missed, and decisions are driven by cost and system capacity rather than need. Families must be treated with respect.

The DfE should focus on ensuring that Local Authorities comply with existing law, rather than introducing reforms that shift the system from being based on need to being based on available capacity.

Making schools accountable for delivering SEN provision is concerning because it could harm relationships between schools and parents. Families are rightly worried about how accountability would work in practice.

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

EHCPs are already evidence-based. What is needed is clear accountability so poor practice can be challenged effectively. Your proposals do not do enough to address accountability, and shifting responsibility from Local Authorities to schools, while also limiting the tribunal's powers, could lead to greater inconsistency and leave families with fewer ways to challenge decisions. Schools also lack the expertise and resources to take this on.

Without accountability and consequences, evidence can be disregarded with impunity.

Greater standardisation will not fix this. The real issue is insufficient capacity and funding to provide placements and support.

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

Our families support making mainstream schools more inclusive, but the practical details must be carefully considered, and many families have concerns about the credibility of the proposed reforms.

The proposed structure appears designed to manage demand rather than meet need. Classrooms need greater flexibility, smaller class sizes, and more room for children to move and engage in different ways. There should also be less testing and less pressure on children to perform academically or meet arbitrary standards. The current system does not nurture a love of learning; instead, it causes many children to feel they have failed from an early stage.

The proposals appear to focus on assigning children to a layer of support and relying on teachers and staff to identify needs. This risks overlooking children who quietly fade into the background and whose needs may go unrecognised.

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

Our families have concerns about this structure and that the layers may become a barrier to further support. It is unclear what evidence teachers will rely on to identify needs and what rights children have to provision in ISPs.

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

Parents are concerned that early, school-led identification and decisions made by non-specialists may not be accurate or improve outcomes. They are also worried about whether support will be delivered effectively and be sufficient to meet children's needs.

Parents and carers of children in the targeted plus layer should be given priority for their preferred mainstream secondary school. Families of children with SEN need to be able to choose a school based on factors such as size and pastoral support, rather than being limited to their catchment school. Secondary schools differ significantly, so families must have meaningful choice.

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

Children in the “specialist layer” are likely to have significant, complex, and long-term needs.

Assessment must be accurate and independent and carried out by qualified professionals. Placements must be suitable, based on need, and provision must be delivered regardless of availability or cost.

Provision must be legally enforceable.

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

If mainstream schools are expected to support more children with SEND and increasingly complex needs, they must take a whole-school approach to inclusion. This is essential to reduce bullying and help pupils understand and accept difference. Children and young people should be taught about difference, particularly as staff cannot supervise all peer interactions, especially in secondary school playgrounds.

Children often struggle because they are in the wrong environment, cannot access learning, or do not receive enough support.

Children with SEN and related mental health needs may benefit from a therapeutic setting with adapted teaching methods.

Parents need a choice of schools based on factors such as size, quality of SEN provision, and strength of pastoral care.

Barriers to access for fostered and adoptive children who've suffered early trauma & not necessarily having a diagnosis must be considered.

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.

We are very concerned & shocked that the terms “needs”, “mental health”, and “learning” have been removed from the proposed areas of development. Removing these words does not remove the underlying needs. Very curious language changes.

Mental health is an escalating crisis in our schools, yet school staff are not mental health professionals or clinicians.

Is mental health being downgraded by being removed from 'new areas of need' in the SEND code of practice? This creates a dangerous paradox, flying in the face of research and the shared understanding of how these needs overlap—an overlap this new framework fails to demonstrate.

Learning difficulties are distinct from executive functioning needs.

Critical issues—including Emotionally Based School Avoidance (EBSA), attendance, trauma-informed practices, and the phenomenon of masking children—have been completely omitted.

We need a Code of Practice that reflects reality, not one that sanitises the language at the expense of vulnerable children.

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?

Joined up working would need to be overseen and support coordinated. We haven't seen the health care element working in an EHCP currently - it's very focussed on education. The lack of social care needs and provision in EHCPs is a well known national issue and the proposals appear to do nothing to address this.

These reforms are very focussed around schools, but little around other types of childcare such as child minders. How are child minders supposed to access support for SEN children in their care?

The portage service plays a very important role in supporting families of those in EY and with complex needs in our area (but is not available nationally). They are able to signpost to other agencies and assessment pathways and to co-ordinate that support.

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.

Additional needs are not always clear at age 2. There needs to be open access to assessment & review beyond this age band along with access to advice and support.

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

Our parents are concerned about the contents and evidence base for new Inclusion Standards. It is unclear what meaningful provision will be available.

ID tools will be no good if those using them are unsure of what to do with the results or how to apply them & are not sufficiently resourced & staffed to deliver them.

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

The quality of the training & the content really matter, but also who will be delivering training. Will ITE be expected to do this training?

Making mainstream genuinely inclusive is important to our families but they feel training modules must not be a substitute for specialist input, proper assessment and access to support.

A better understanding of masking in ND children and young people should be included in training as many of our parents experience children who present differently at home, and this is often dismissed when families need supporting. Other things important to our families are training around neuro-affirming language and strategies and how different ND children may present their dysregulation (which may be internalised).

Children can be cruel and pick on others who are different to them. For mainstream to be genuinely inclusive, training needs to include supporting all children to accept differences and strategies to reduce bullying of those who are different.

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

You can't reduce workload by increasing responsibility and without adequately increasing resources. Our families are concerned that schools haven't been given enough information about the reforms & the implications.

Our families feel the education system needs a major overhaul and that both children with and without SEND are being failed by a system that is no longer fit for purpose and appropriate for modern times.

Children joining schools are coming in with fewer skills and expected to meet EYFS and National Curriculum requirements that would have been taught/achieved in higher year groups previously. This means that teachers and TAs are not only trying to support the less able but follow IEPs and EHCPs that are difficult to implement due to non-existent budgets, staff cuts and a lack of resources. The majority of teachers and TAs would love to be able to help everyone but at what cost?

The children with SEND are not having needs met currently and this will not change even with the proposed reform. Also, it is likely that even more teachers and TAs will leave education as they are facing burn out already and the proposal will add even more pressure. Children with SEND should not have to face being placed in inadequate

mainstream schools because their needs are not deemed 'complex' enough by someone that has never met the child and does not view them as an individual.

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

Our families feel SENCOs require better support & resources as they are managing increasingly complex cases, often alongside administrative and teaching responsibilities & with little to no protected time. Adding to workload & responsibilities will make the role impossible.

Our families have serious concerns that any review of the role of the SENCO to become more strategic will result in gaps delivering the operational side of the role. If the roles become segmented into strategic and operational (which they may need to be) there will not be sufficient training at both levels due to the heightened level of responsibilities. Alongside increased administrative responsibilities, SENCOs need to be strong communicators, understand respective therapies, coordinate multi-agency support, liaise with families, and to ensure targeted support is delivered, timely and effective.

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

The families we represent dislike this proposal & have huge concerns about whether it will deliver in practice. We do not understand the evidence base to support this fundamental change as it is similar to the old 'Action' and 'Action Plus' plans from 1996 which is legislation that failed.

Families have concerns that sections B & F of an EHCP will be placed in an unenforceable document.

Our parents are concerned that ISPs will be reviewed annually, only internally and that there will be no legal framework to challenge decisions, content and delivery of provision within an ISP, other than going through a new schools complaints system.

We have concerns about how schools & governing bodies will be expected to deal with the additional responsibilities and complaints over quality & delivery of provision in an ISP. Accountability is vital to our families and they have serious concerns about the removal of legal protections of section F under Section 42 of the Children and Families Act.

Without funding attached to an ISP our families feel that may lose vital support their children require such as direct and individual 1:1 support (as this is costly). It is very unclear how the DfE will ensure mainstream schools are sufficiently resourced to deliver ALL of the provision to meet the needs of every SEN child.

The quality of ISPs being judged by Ofsted (every 3-5 years) will be irrelevant if the provision is not being delivered & there is no way to ensure it is.

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

Ordinarily available provision and reasonable adjustments should be available to all in education, without requiring an ISP document to receive it.

When children's needs are complex they need professional input, assessment and properly specified provision. Teachers are not qualified to assess & diagnose ND or MH conditions nor make recommendations to meet identified needs. This information and day-to-day provision may never be concise.

What is also important to our families is not just to have an ISP, but that there is a legal duty on settings to deliver the provision (and that they are sufficiently funded to do so).

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?

Our parents feel this section is lacking details, particularly in relation to Post 16.

Transitions require early, coordinated planning, social care involvement where necessary, and continuity of provision.

The reform proposals suggest transition points are likely to be where a child could lose their EHCP in the future system & this is a huge concern as our parents feel transitions are often when support needs to be more enhanced & better coordinated, not removed.

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?

Capacity and expertise in bases is essential but our families have serious concerns about the delivery of this part of the reform proposals. There is not sufficient teaching expertise and experienced support staff for this to be realised or effective.

Inclusion bases could become places where children are contained and segregated. Spaces may be created with good intentions, but without the resource or flexibility to meet the needs placed within them, that may be conflicting. Specialist bases cannot possibly meet the needs of all that will need them and if the bases specialise in type of need, the one required may then not be local to the child either so this is very unclear.

It is unclear to our families how capacity will be managed and this will limit fluidity across this system.

There are children, in many of our families, who will never be able to access the mainstream curriculum and activities, no matter how adapted.

How are DfE measuring success & inclusion? Segregation is not inclusion. Success for those requiring the 'specialist' layer cannot be measured against academic, performance or curriculum standards used in mainstreams.

It is unclear who will determine criteria and thresholds for access to support or specialist bases and what that will be based on, whether it would require a diagnosis or if barriers to accessing assessment will be considered?

We don't understand what level of coordination there would be in the local area.

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

There are children, in many of our families, who will never be able to access the mainstream curriculum and activities, no matter how adapted. The mainstream environment is inappropriate for the majority of children who would be in the specialist layer.

Our families feel it is vital the DfE expand capacity of specialist school placements.

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?

Our parents are worried about access to specialist professionals because it is currently limited - there are considerable waiting lists & capacity issues.

They are worried that Experts at Hand is very aspirational and whether the system has the workforce capacity to deliver EAH.

Upskilling education staff (or advice passed on to TAs so they can deliver interventions) is not the same as proper access to specialist professional time for children in mainstreams.

This model is not aimed to support at 1:1 level. Group level support will not be sufficient for children with significant & individual needs. It not only sets out to deliver less support but to also dilute expert advice.

Proposals to rely on trainees & support roles to deliver and recruit from the private sector or those who have left the profession is madness. Those involved in teacher training at University have not heard anything about taking on more students in these areas to fulfil future expertise.

We are concerned about responsibilities being pushed to schools and are unsure of the role of the LA in deciding on the allocation of expert time & speciality. The time in expert

days promised in our area is over 3000 days in mainstream schools (not including EY allocation or FE)

It is a concern that those who mask may be overlooked, and 'different/difficult' behaviour will be addressed as priority.

We are being asked to agree to something that we don't have enough information about as EAH guidance is not published and there seems to be no guarantee of provision.

Our parents don't understand who will be considered an 'expert' or where CAMHS fits this model (whether mental health is seen as separate even though there is an overlap).

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?

Our families are concerned about capacity in the system. Decisions about specialist placements must be based on needs rather than what is available in the system or what package a child is supposed to fit.

Children and young people with highly specialist high level needs may need more than what is in a particular SPP - what happens in that case? Will their provision be capped because it is too expensive? If not, what determines whether a child can access the provision they need? It is hard to see how this is supposed to work in practice.

The phrase "good value" has been used to justify austerity and cost cutting. While of course there is a duty to spend public money wisely, too many families have heard "good value" used as an excuse not to make provision for their child or to meet their child's needs.

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

There is a high level of concern among our families about SPPs. This is heightened by the lack of detail about what they might contain and how detailed they will be, as well as how it will work if an individual child needs provision from more than one package, or has a combination of needs that do not fit predominantly into one of the packages.

The lack of EOTAS within the packages is a notable omission, as well as the lack of detail about how health and social care needs will be accommodated - it is hard to see how this would work.

In general families are deeply unhappy about the idea of standardised pre-determined, and possibly price-capped packages of provision. Our children are individuals, and their needs should be what determines the support they get, not what packages exist. The fact that during the consultation it has come out that it will be possible to mix and match provision from different packages means this makes much less sense, it is hard

to see what role packages would play. They look more like a way of gatekeeping resources than improving the system to make it more fair.

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?

There is cautious support for the idea of a national standard EHCP template.

Parents and professionals are concerned about the radical change where the EHCP will be developed after the setting is decided rather than before. It is very hard to imagine the details of how this will work in practice and whether there is a danger that this will result in unmet need as children will be expected to conform to a plan rather than looking at their needs first.

There is a real concern about enforceability and specific provision. If only the EHCP is legally enforceable, and the day to day support delivered in an ISP is not, this is a radical removal of rights. For those of us who have had to fight to get specific provision in an EHCP, this is very worrying. The accountability in these proposals is very unclear - what exactly will be legally enforceable and what won't? What guarantees a child's needs will be met, rather than their plan just containing what the setting can deliver? If a child specifically needs 1:1 support in the classroom to learn, it seems that will no longer be legally enforceable, for example. Parents are also worried that funding will be moved towards block or cohort funding for groups of children with similar needs, and children with high level expensive needs will lose out.

While the proposal has stated that EHCPs are being retained, these are EHCPs in name only - with no guarantee of specific provision, no appeal to tribunal for assessment, provision or placement.

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?

It is hard to comment without knowing what is meant by "complex needs". In the proposals, "complex" is defined as needing a specialist provision package, so this is circular.

Many families report not being able to access support early enough because their child's needs are not recognised. There is a particularly long wait for autism and ADHD assessments in our area with barriers to even getting on the waiting list which means young people wait too long to access support.

Early identification of need will rely on highly skilled EY development professionals and a multidisciplinary approach which is accessible to all fairly. It doesn't sound as if this will be accessed via the Experts at Hand model or the Best Start hubs, because these are for children who have a lesser level of need. Therefore there needs to be a mechanism for children with more complex needs to be able to access specialist support.

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

Families are generally positive about the current needs assessment process, although many would like more parental input.

“Parents are the number one people who understand their child, and yet more emphasis is put on the advice of someone who has spent less than an hour with their child.”

The issue with current needs assessments is that they are not delivered within statutory timeframes, often because of a shortage of professionals.

There is significant concern about whether needs assessments under the new proposals will just be assessing which package is needed rather than looking at the specific needs of an individual child. Children are all individuals and their needs are what is being assessed, not whether they meet some predetermined package.

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?

Currently too often LAs propose settings that cannot meet needs, either because they do not properly consider the needs set out in the EHCP, or because they do not think this is necessary.

Placement decisions should be needs led. It is a real concern that the list of proposed settings may be influenced by factors such as availability, cost, and local commissioning arrangements. Families should be given a meaningful choice.

Our families are concerned about the significant change proposed where the process starts from the sorts of needs a school can meet rather than the needs of the individual child. There is a concern that children will be pushed into conforming to what a school can offer rather than looking at what setting the child needs, and that what schools offer will become more restricted and formulaic rather than child-centred.

There is also a major concern that as SPPs have not yet been decided, it is impossible to comment on how this will work in practice. If SPPs can be mixed and matched, how will this work if there is no school that can meet the specific combination of needs of an individual child? Will specialist settings be expected to meet all needs?

Finally there is a concern that the changes proposed will result in schools having to make major changes to admissions policies and other processes, without sufficient time or funding to make this work.

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

Parents need clear, accessible information about the nature of provision in each setting, including the type of support available, staffing, and how needs are met in practice. They need to know class sizes, the level of specialist expertise available, the nature and frequency of therapeutic input.

At the moment parents of a child with an EHCP are asked to name schools they want consulted, but are often not able to visit any schools to see whether they think it would be suitable for their child until they confirm they want a place at the school. This is because of the lack of specialist school places, but means that school places are being chosen without the right information being available.

Currently often families feel they are not being given a meaningful choice. At the moment families have a legal right to appeal to the tribunal if they disagree with the choice of the LA, but the proposal is that this will change and so families may have no choice in reality.

Our families are really angry about the decision which apparently has already been made to reduce the powers of tribunal. If the tribunal cannot name a setting then the decision will be made by the LA who are looking for value for money rather than meeting the need of the child. The LA won't be impartial and there is no confidence that they will be fair. The tribunal is impartial and focussed on the needs of the child. The LA may just be out to save money.

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.

What is important is that AP is regulated and quality assured. Our local families have been shocked by the involvement of a convicted criminal in a local AP and the lack of scrutiny by the LA of safeguarding processes which may have contributed to this situation.

We do not see a reason for imposing an arbitrary time limit for any AP placement. AP serves different purposes for different children & will depend on their needs and circumstances.

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

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

There is some agreement that aligning expectations around admissions, standards, transparency and accountability is a good idea. However there are significant concerns around

- residential placements - how would these be affected by costing bands?
- specialist placements especially for children with complex and low incidence needs - currently demand significantly exceeds supply.
- blanket price caps that do not take into account what provision is available at a specific setting. Some children and young people do require extremely expensive specialist provision.

Independent provision is often chosen because the required provision is not available elsewhere. This sector delivers a lot of specialist therapeutic input that is not available in maintained settings. Any proposal to cap costs has to take into account the possibility that this will reduce access to provision and leave children and young people without a school place at all.

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

Accountability should be transparent and linked to clear outcomes and delivery. It also needs to be justified externally - there is a concern that schools will be 'marking their own homework'. Ofsted inspections are too infrequent to provide sufficient independent oversight and it is unclear how else schools will be held to account.

There need to be genuine incentives for schools to be more inclusive. Asking them to write an inclusion strategy report is likely to become just a tick box exercise, with standard text cut and pasted, just as the accessibility strategy required under the Equality Act is in most cases.

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

Our families have significant concerns about this proposal. If funding sits within schools then they become both the provider of provision and the gatekeeper of the resources needed to deliver it. There will be a conflict of interest between supporting individual needs & protecting budgets. This will not lead to inclusion of those with high level & costly needs.

Our families are also very concerned that this proposal will draw parents into direct disputes with settings when there has to be trust between the family and the setting,

especially when they are caring for a child or young person with significant or complex needs.

There is also a significant concern that the proposed funding will not be anywhere near enough to meet the needs schools will be expected to meet. If funding is removed from LAs so it can be given to schools, there is a concern that LAs won't be able to fund enough special school places, Specialist Bases and specialist services for those with higher levels of need.

The basic problem at the moment is that there is not enough funding in the system, and these proposals are insufficient to address this.

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?

Our families do not see the benefits of schools being part of a group. Too often this means that responsibility for delivering provision falls between cracks. If responsibility and decision making are not clear, children and young people lose out. An additional layer of administration risks more drift and delay, due to a lack of clarity about responsibility or more complex processes that families have to try to understand.

When resources & decisions are shared who will be responsible for ensuring provision is delivered?

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

Every SEND parent has faced the issue where their child's problem turns out to be nobody's responsibility to deal with. This is because there is a lack of accountability and responsibility in the current system. Any new system must fix this by making sure decision making is impartial and transparent with clear timescales and an independent route to resolve disputes. Disputes should not delay the provision an individual child or young person receives as so often is the case at present.

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

There are many working groups around SEND and unless there are clear lines of accountability with measurable outcomes, they just become a talking shop. Part of the issue is the lack of clarity in responsibilities between various groups with their own funding and processes, particularly education, social care and health. Local partnership groups will not be effective unless they can measure whether outcomes are delivered, for example, whether children are getting the support they need in suitable placements, and effect change if outcomes are not achieved.

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

Schools, health services, social care, and families themselves must be involved. Input must be meaningful & influence decisions. Families and young people need to be centrally involved, not just consulted. There is a real concern that this will not happen, because many decisions about the new system have apparently already been made, suggesting that the voice of young people and their parents is not valued in these proposals.

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

Plans do not deliver provision. Aspirations alone do not equate to improvements. The system needs to identify and address failure so that it can improve.

Reading Families' Forum is deeply concerned about the speed at which local authorities are having to draw up strategic plans so that they can access funding. This work is too important to rush through, but the DfE is insisting on incredibly short timescales. This has meant that our local parent carer forum has not had anywhere the capacity to work meaningfully with the local authority on the strategic plan.

The consultation and local improvement plan have placed a completely unreasonable burden on our parent carer forum. The additional £3500 from the DfE is almost useless because we are doing the work now and it will come too late, and we cannot magic the time needed to do this properly out of thin air. The lack of respect shown for our parents who are volunteers is really disappointing, and suggests that the DfE perhaps does not really understand how coproduction works in practice, which does not bode well for the future.

At the same time, as a forum we are dealing with a huge amount of distress and anger about the direction of the reforms, the loss of legal rights, and yet again families not being listened to. The DfE briefing seems to be completely ignoring this and failing to acknowledge the huge lack of trust in the current system and proposed reforms.

There needs to be learning from the failures of joint working in the current system. A major concern is that there is so little about social care or health in the current proposals, suggesting that the DfE is unable to collaborate either with the DHSC over adult social care, or with itself around children's social care. We know that LAs and ICBs do not work well at present to provide joined up services across education, health and social care. There is a complete absence in these proposals of any credible way to address this.

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

It is very odd to suggest that information, advice and guidance will ensure fairness. There is a critical lack of trust in the system at present and in these proposals, and suggesting that what is needed is information and advice, rather than protections which are legally enforceable, is part of the reason why families are so angry about these proposals.

At present there is a clear legal position which sets out the right to support, along with lots of advice and guidance from the SEND CoP, IASS, Local Offer etc. However there is no fairness because local authorities are able to break the law routinely and are not held accountable.

Fairness comes from working collaboratively with stakeholders, allowing time for views to be heard and ensuring clear accountability when things go wrong. None of that is happening at the moment, particularly with this consultation and the need for local authorities to draw up reform plans without sufficient time to do this properly or work collaboratively with families.

Improving information & guidance will not ensure fairness. Fairness comes when needs are met & provision is delivered without a fight, when each child has what they need to succeed & there are sufficient placements to meet demand. Guidance clearly does not secure this even when rights are clear (as they are now).

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.

Complaints about SEND provision need objectivity, expertise and impartiality. Governors tend to side with schools and it's unclear that the SENCO will have the independence and be able to view the situation objectively to make a fair decision. Families are very concerned about the lack of accountability in the proposals when there is such a long history of provision not being delivered. Leaving this to Ofsted to enforce (which only happens every 4-5 years) is not an acceptable solution.

Especially in the early days of implementing any new system there needs to be a way of developing trust and making impartial decisions based on evidence and expertise. This is necessary not just for children and young people and their parents, but for schools themselves.

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?

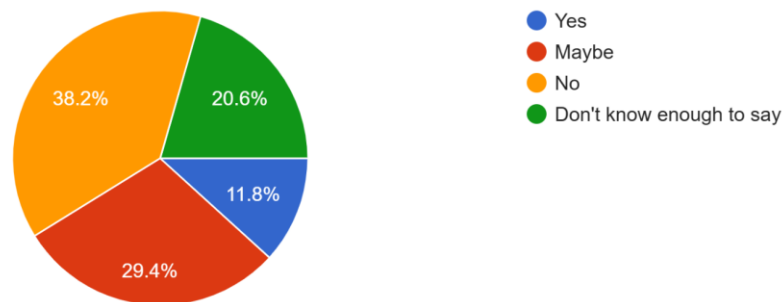
We asked our families some questions to find out how they felt about the proposals in a quick questionnaire and a longer one with the ability to leave comments. We also invited contributions to an online padlet and by email and through engagement events which were attended by 20 different families. Comments from the padlet and our engagement events are included in our response. The responses to our questionnaires are below.

Do you think the proposed reforms will improve access to support for children and young people with SEND? 38 responses

Yes: 4 (12%), Maybe: 10 (29%), No: 13 (38%), Don't know enough to say: 7 (21%)

Do you think the proposed reforms will improve access to support for children and young people with SEND?

34 responses

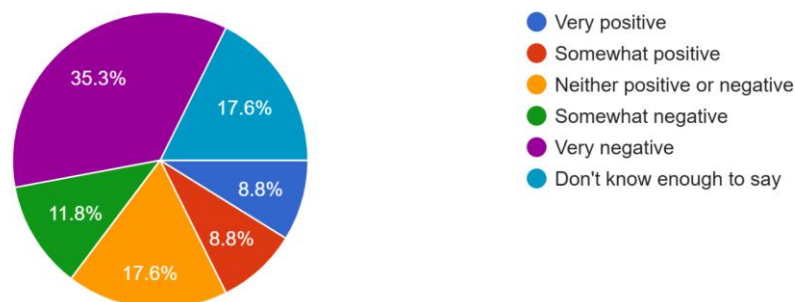


Overall, how positive do you feel about the proposed SEND reforms? 38 responses

Very positive: 3 (8%), Somewhat positive: 3 (8%), Neither positive nor negative: 6 (18%), Somewhat negative: 4 (12%), Very negative: 12 (35%), Don't know enough to say: 6 (18%)

Overall, how positive do you feel about the proposed SEND reforms?

34 responses



What do you like about the proposed reforms? 5 responses

Early identification and early years support was mentioned, as well as the ambitions to increase inclusion, reduce postcode variation and make the system less adversarial. One response said they liked nothing about the proposals and another was unsure whether there were any positives.

What are your main concerns about the proposed reforms? 6 responses

The comments here were very telling.

Almost every response mentioned the removal of legal rights. Two mentioned the worry that support at primary school would not be carried over to secondary school. Two mentioned standardisation, ie the loss of individual assessment. Three mentioned concerns about how schools will manage the additional workload including accountability.

“My concern is not with the direction of travel, but with whether the proposed reforms will be sufficiently funded, legally enforceable and flexible enough to meet complex and changing needs.”

“The system needs to change, but not in the way the white paper sets out. Reform is sorely needed and gladly welcomed, but existing legal protections must remain in place to protect vulnerable families.”

“The law does not need to be rewritten. It needs to be properly enforced.”

Of the families providing these longer comments, 100% thought that the proposals would not improve support for children and young people with similar needs to their child. 83% had significant concerns and the remaining 17% had more concerns than positives.

On balance, do you think these reforms would improve things for children who have needs similar to your child?

6 responses



Other specific comments under this section included

It is worrying that LAs are being made to go along with the DfE proposals so they can access funding, without the time to consult locally and put well thought through plans in place. This is incentivising compliance with policy which is still under consultation.

The strengths of the current system lie in individual rights to assessment & provision to meet individual needs backed by legal rights to ensure delivery. Unenforceable ISPs, restricted generic packages of support from a menu & limited costed frameworks is not reform. Children must not be made to fit what provision the system can deliver in their local mainstream school.

It's sounding more and more like adult social care commissioning models. And that's concerning.

It will be Judicial Review or disability discrimination tribunal to challenge decisions, not parent-friendly SENDIST tribunals. This will be financially out of reach or too difficult for so many people. Accountability is a huge concern.

Where is the health and social care element? This is lacking and is very disappointing, it is very focussed on schools. Health and social care are lacking currently in EHCPs and this hasn't been addressed in the proposals.

Is this consultation a ploy so that people don't engage and the government interpret this that people are happy with proposal? The questions are overwhelming and too much to deal with. The consultation excludes parents and carers who are tired and don't have the spoons/capacity to fill in forms and advocate for themselves.

The SEND Tribunal has been the only route to secure suitable placements for children. Huge concerns over removal of parental rights.

Has the government properly consulted with workforce leads, professional and statutory bodies and within the NHSE, DfE and other training providers (Higher Education / CPD) so they can support the expansion of the professionals required to support the new SEND provision. ? For example, it is currently very difficult to secure SEND placements for ITE students due to reduced staffing / high resource turnover and lack of skilled mentors at the appropriate level.

With budgets devolving to schools for SEND education, what involvement and responsibilities will Local Authorities have with families, carers and Children of SEND and will this lack of central coordination create inefficiencies and silos?

There is a lack of reality from DfE that reform to this extent can be achieved.

An MP at an engagement event suggested to a parent that their child (who does not have a placement) could have Access to OTs etc in school holidays & an ipad – how much will

this cost and has it been counted in the funding? It doesn't sound realistic to those of us who have had to struggle to get OT support.

Parent feels generally appalled by the reforms. The timeframes are unrealistic. Nobody has thought it through properly – it doesn't feel credible, and will take more than 3 years to implement.

Several families expressed a general worry about losing nuances on the consultation as it is being put into AI.

Concern about specialist schools with the focus on local authorities reducing specialist places when they are needed - why aren't there more special needs schools being built?

Submitted by Reading Families' Forum, 17th May 2026