

SEND reform: putting children and young people first

NFER submission to the DfE's White Paper

1 Ensuring children, young people and their families are involved in making better, evidence-based decisions about SEND, both in their local area and across the country

NFER research, alongside that of other organisations, has highlighted that families' influence within the SEND system is uneven and strongly shaped by confidence, knowledge and capacity to navigate processes, rather than by need alone. Families who are more familiar with SEND thresholds, documentation and routes of challenge are more likely to secure preferred provision or placements. For example, research by the Sutton Trust (Double Disadvantage, 2025) highlights that disadvantaged families are under-represented among EHCP beneficiaries. This contributes to inequity and undermines confidence in the fairness of the system. It also supports an argument that "genuine say" requires not only participation opportunities, but also clearer guidance, transparent processes and support for families who are less able to self-advocate. Empowering children, young people and families from all backgrounds to provide feedback will be crucial to ensure all groups have a genuine say in decisions.

2 Ensuring that high-quality evidence and best practice inform decisions about SEND

As recognised by the White Paper and accompanying consultation, there is a pressing need to develop the evidence around SEND identification and practice. For example, NFER research has highlighted the need for developing the evidence base on inclusion bases (see our responses to Q18/19); building evidence for best-practice approaches in how groups of schools work together to support pupils with SEND (see NFER report The MAT Factor) and developing consistency in the quality of SEND practice and approached to SEND identification across schools.

In addition, ensuring that evidence and adequate training for supporting pupils with SEND needs is embedded in initial teacher training and professional development will be crucial to ensuring the success of reforms.

3 Ensuring that children are best supported by the Universal offer

NFER research suggests universal provision is most effective when embedded within a clear graduated response. In high SEND contexts, schools report that where universal strategies

are insufficiently resourced or poorly connected to targeted support, needs are more likely to escalate into crisis driven referrals. This increases pressure on specialist services and contributes to unsustainable workloads, particularly for SENCOs.

The evidence therefore suggests that strengthening the Universal offer must go hand in hand with clear pathways to additional support, protected capacity for early identification and review, and realistic expectations about what universal provision can achieve on its own.

4 Ensuring that children in the Targeted layer, are best supported

The new tiered layers will work most effectively where intervention is early, timely, clearly defined, and consistently implemented, rather than being dependent on individual school capacity or crisis escalation. Evidence from NFER high-SEND schools research shows that in the current system variability in thresholds, identification practices, and access to specialist advice leads to uneven support for pupils with similar needs.

As highlighted in Q3, a robust graduated response with clear assess–plan–do–review (APDR) cycles will be key to the new proposed structure. Our research suggests that schools that invest in and protect SEND leadership capacity (as appropriate given a school’s context) may be better able to coordinate interventions, adapt support, and prevent escalation into more intensive provision.

The success of the tiered layer system depends on schools having access to adequate funding to support pupils with SEND. This is particularly key given the uneven distribution of pupils with SEND across schools, such that the burden of these plans would fall disproportionately on these schools.

While we welcome the consistency and transparency which Individual Support Plans would introduce, we have concerns about the workload implications for schools. There is also the risk that having plans which are shared live and have a legal basis may inadvertently limit the range of support introduced by schools (e.g., schools may be more conservative/hesitant in what they commit to).

Overall, NFER evidence suggests that strengthening the Targeted layer depends on clear thresholds, protected leadership capacity, timely specialist input, and consistent system-wide expectations, enabling schools to intervene early and effectively before needs escalate further.

5 Ensuring that children in the Targeted Plus layer are best supported

In addition to the considerations set out in Q4, the success of the “Experts at Hand” offer will be crucial to ensuring children are appropriately supported in this tier. NFER evidence shows that access to early specialist input is critical. Schools report that delays in accessing educational psychologists, speech and language therapists or other specialists contribute to

uncertainty and increase workload, often resulting in reactive rather than planned responses. This is alongside ensuring the success of “local school groups” (see response to Q32). In addition, as outlined in our response to Q18/19, developing the evidence for the successful implementation and operation of inclusion bases will be critical to ensuring children are best supported in this tier.

6 Ensuring that children in the Specialist layer are best supported

In addition to the considerations set out in Q4 and Q5, it is crucial that there is equity in access to the Specialist layer among pupils. The current EHCP process is strongly shaped by families’ confidence, knowledge and capacity to navigate processes, rather than by need alone, which generates unfair outcomes. It is crucial that there is greater equity in access for young people from all backgrounds under the new system.

Further, the success of this layer will depend crucially on the design of “Specialist Provision Packages” which will need to provide adequate flexibility to be tailored to the complexity of pupil needs, whilst ensuring greater consistency in support between pupils.

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

NFER research highlights increasing complexity of social, emotional and mental health needs in mainstream schools, particularly those with high SEND prevalence. These pressures affect pupil outcomes and staff wellbeing.

Effective support depends on realistic expectations of mainstream capacity, access to specialist mental health services, and sufficient staffing. Where schools are expected to meet highly complex needs without adequate support, risks to staff wellbeing and retention increase. Reforms should therefore address system-level drivers of mental health pressures, not rely solely on school-level responses.

8 Refreshed ‘areas of development’ supporting educators to understand and address barriers to learning and participation

We are supportive of the general principle underlying the refreshed ‘areas of development’, and the shift from a “diagnosis” focused system to a more “needs” focused one. However, we have concerns about whether the proposed changes will adequately recognise the interconnected nature of different areas of need and ensure that the complexity of different pupil needs is reflected in the support offered to them.

9 Arrangements that 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

We are supportive of the focus on better joined up working and focus on SEND in the early years. We do not have specific views on the arrangements which would better support effective working.

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11 The top three priority areas for building and sharing evidence within the National Inclusion Standards

NFER evidence points to three priority areas for building and sharing evidence. First, systematic evaluation of inclusion bases and similar provision models, given their uneven impacts and potential to concentrate need. Second, developing evidence on the most effective provision for supporting different types of SEND. Third, developing a consistent framework to support SEND identification will be critical to the success of the reforms.

12 The most important issues for national training to cover, to help support children and young people with SEND

NFER research shows that expertise in supporting pupils with SEND is unevenly distributed across schools and often develops in response to concentration rather than planned workforce development. Training priorities should therefore include inclusive classroom practice, SEND leadership capability, and support for pupils with co-occurring and complex needs. National training that builds baseline capability across schools would reduce reliance on a small number of high-SEND schools to develop system expertise.

Secondly, there is also a need for training on consistent, evidence-informed approaches to identifying SEND within a needs-led system, particularly to reduce variability in thresholds and interpretation across settings. In addition, there is a role for training in the use of data to identify emerging patterns of need, monitor SEND distribution and inform more equitable planning at the school and system level.

Finally, there is a need for training on how to effectively implement and integrate inclusion bases within mainstream settings (see Q18/19). Evidence suggests that without clear expectations and strong integration between base and mainstream provision, there is a risk that inclusion bases develop into weaker parallel provision rather than strengthening inclusive practice across the whole school.

13 Practical actions that can help teachers, educators and leaders manage workload whilst implementing these changes

NFER research indicates that SEND-related workload pressures are driven less by the act of supporting pupils with SEND and more by system complexity, administrative burden and crisis-driven escalation. Practical actions to manage workload should therefore focus on reducing avoidable process demands and strengthening capacity rather than adding new layers of activity.

The evidence strongly supports protected and distributed SEND leadership capacity. High-SEND schools report that workload is more manageable where SENCOs have protected time and where SEND responsibility is shared across leadership teams, rather than concentrated in a single role. This enables earlier intervention, clearer decision-making and more effective coordination, reducing reactive workload.

In addition, workload is more sustainable where early access to support and specialist advice prevents escalation. Schools report that delayed access to expertise results in crisis-driven responses that are significantly more time-intensive for staff. Ensuring timely advice at earlier stages supports both outcomes and workload management.

Finally, evidence suggests workload pressures are amplified where individual schools absorb disproportionate responsibility due to uneven SEND distribution. System-level actions that recognise and mitigate concentration effects—through shared planning, resource redistribution or pooled expertise—are therefore likely to be more effective than school-level workload interventions alone.

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

NFER research indicates that the effectiveness of SEND provision within schools is closely linked to the capacity and positioning of the SENCO role, particularly in contexts with higher concentrations of pupils with SEND. Evidence from high-SEND schools shows that SENCOs play a critical role in coordinating support, guiding staff practice and liaising with families and external professionals. However, the same research highlights that SENCOs are often constrained by workload, limited time allocation and an over-emphasis on administrative responsibilities. In turn, the evidence cautions against further expansion of SENCO responsibilities without corresponding increases in time, authority and support.

The evidence suggests that the SENCO role is most impactful where it operates within a school with protected SENCO leadership time, rather than being primarily focused on compliance and paperwork. High-SEND schools that report stronger capacity to identify needs early and manage complexity are more likely to have SENCOs with protected time, access to senior leadership, and support from distributed SEND leadership structures. Where SENCOs can work proactively—supporting staff development, embedding inclusive

practice and overseeing graduated responses—schools report fewer crisis-driven escalations.

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

NFER research on high-SEND schools highlights the importance of consistency across the system. Variation in thresholds, expectations and language between schools and local areas contributes to uncertainty and dispute. Clear quality standards for Individual Support Plans, applied consistently, would help families understand what they can expect and reduce reliance on advocacy to interpret provision.

16 Ensuring Individual Support Plans are clear, concise and practical for professionals to use

NFER evidence suggests that the clarity and usability of support plans depend less on format and more on alignment with practice, consistency, and proportionality. To be practical, ISPs should focus on core, actionable information: clearly identified needs, the specific support to be provided, and how this will be delivered and reviewed. These are likely to be most effective where they are integrated into existing school systems, such as the graduated approach, rather than operating as an additional layer of paperwork.

NFER research also highlights that excessive administrative burden reduces staff capacity to deliver support. Consistency across local areas in expectations and terminology would further improve usability by reducing the need for professionals to interpret or translate different requirements. This was a key issue reported in NFER's research report on SEND in multi-academy trusts.

As highlighted in Q4, while we welcome the consistency and transparency which Individual Support Plans would introduce, we have concerns about the workload implications for schools. There is also the risk that having plans which are shared live and have a legal basis may inadvertently limit the range of support introduced by schools (e.g., schools may be more conservative/hesitant in what they commit to).

17 Support transition for young people with SEND, so that they are well supported into post-16 provision and further education, training or employment

NFER evidence suggests that transitions to post-16 destinations are a key pressure point for young people with SEND, with outcomes shaped by support received prior, continuity of support, and access to suitable pathways. Research on high-SEND schools identifies

transitions—particularly into secondary—as points where unmet need can escalate; this pattern is likely to extend into post-16 where preparation is insufficiently coordinated.

NFER's *Skills Imperative 2035* emphasises that successful post-16 transitions also depend on access to a broad range of pathways, including further education, vocational routes and supported employment. The availability of appropriate “stepping stone” qualifications is particularly important for young people with SEND, enabling progression at an appropriate pace where direct transitions into more demanding routes may not be feasible.

NFER research on GCSE resits highlights the importance of timely, comprehensive transfer of pupil information between schools and post-16 providers to support a smoother transition and enable early, appropriate support. While these findings are not specific to young people with SEND, providers often report difficulties in preparing students for November resits due to incomplete or delayed information from schools on prior attainment and wider contextual factors. This can limit providers' ability to accurately assess need, target support effectively, and ensure continuity in SEND provision.

More broadly, the evidence highlights the importance of coordinated support across education, employment and wider services. Without this coordination, young people risk falling between systems.

18 Ensuring that every area can meet the full range of the needs of children and young people through Inclusion Bases

NFER evidence suggests that Inclusion Bases can strengthen local capacity, but their effectiveness depends on alignment with wider provision. Our research on high-SEND schools shows that where specialist provision is unevenly distributed, inclusion bases can act as “magnets”, attracting disproportionate numbers of pupils with SEND and increasing pressure on schools.

To ensure every area can meet need, Inclusion Bases should be strategically planned as part of a wider continuum of provision, including sufficient specialist places and clear pathways between mainstream, base and specialist settings. This planning needs to account for the fact that Inclusion Bases will usually have a specialist focus in supporting certain types of support needs. Without this, schools hosting bases may be asked to meet needs beyond their intended remit – a finding highlighted in our high-SEND schools research.

At the same time, it is important to recognise that Inclusion Bases will not be appropriate for all children and young people with SEND. Some pupils, particularly those with severe or highly complex needs, will continue to require access to specialist provision. Ensuring sufficient specialist capacity alongside the development of Inclusion Bases is therefore critical to meeting the full range of need.

Evidence also emphasises the importance of monitoring SEND distribution and local capacity. Regular analysis of where pupils with SEND are placed, and whether demand is being concentrated, would support more balanced planning across schools.

Finally, clear expectations around the role and scope of Inclusion Bases are critical. Inclusion Bases alone will not be a panacea to addressing the SEND crisis.

19 Ensuring that Inclusion Bases help children and young people succeed in mainstream settings

Inclusion bases have the potential to increase capacity, help embed specialist expertise within mainstream schools, and deliver tailored support closer to pupils' communities. But to realise that potential, and to ensure that inclusion bases strengthen rather than fragment mainstream provision, our evidence highlights it is important to provide:

- Sustained, adequate funding
- Access to specialist staff
- Strong integration between base and mainstream teams
- Clear expectations for inclusion and pupil experience
- Monitoring to ensure bases extend, rather than limit, opportunities for pupils.

Without this, they risk becoming isolated spaces that ease short-term pressure without delivering long-term change.

This reflects the fact that the evidence for inclusion bases is mixed. Among schools that reported having a SEN unit and/or resourced provision in our survey of SENCOs and Senior Leaders in November 2025 (see NFER High-SEND Schools research), around two thirds of respondents agreed that this provision enhanced their overall capacity and expertise to support a wide range of SEND. The remaining third comprises less than 10 per cent of primary and secondary schools who explicitly disagreed with this statement, and around a quarter neither agreed nor disagreed.

In addition, only two-thirds of primary schools felt pupils attending the base were well integrated into mainstream lessons and activities. For secondary schools, just under 80 per cent described pupils from the base as well integrated.

These findings suggest that while inclusion bases hold promise, they are not a silver bullet, and more evidence is needed to understand what makes them effective.

20 Ensuring that mainstream settings can get quick specialist support for children and young people through the Experts at Hand offer

For the Experts at Hand offer to be a success, it is crucial that there is adequate investment in developing the specialist expert workforce and adequate consideration for the time taken to train. For example, training to be an educational psychologist is a lengthy process. If the capacity of available experts is not developed, then local partners will not be able to deliver the Experts at Hand offer effectively. In addition, clear coordination mechanisms across

education, health and social care, with defined responsibilities for accessing and deploying specialist support, will be critical to the success of this offer. NFER research highlights that lack of integration and support from local area partners is a key aspect of ongoing challenges for schools in supporting their pupils.

21 Ensuring that children and young people with low incidence, highly complex needs can always access the right specialist placement

NFER evidence indicates that access to appropriate placements for pupils with low-incidence, highly complex needs depends primarily on sufficient specialist capacity, clear thresholds, and effective system-level coordination. NFER's research on high-SEND schools highlights that shortages of specialist provision lead to mainstream settings being used as default placements, even where needs exceed what can be safely or sustainably delivered. It also highlights that Inclusion Bases will not be appropriate placements for many of these children and young people, and investment in appropriate specialist capacity is still required.

To ensure appropriate access, there must be planned sufficiency of specialist places, informed by data on need rather than reactive placement decisions. Without this, local systems rely on available capacity rather than best fit, increasing the risk of unsuitable placements and instability.

Clear and consistently applied referral thresholds and assessment processes are also critical. NFER evidence shows that variation in these processes contributes to delays and inequity, with some pupils waiting longer or being placed in less suitable settings.

Finally, effective access depends on system-level oversight of placements, including monitoring of where pupils with complex needs are placed and whether provision matches need. This helps avoid over-reliance on particular schools and supports a more equitable distribution of responsibility.

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

NFER research highlights the current variation in provision delivered to pupils with similar needs, contributing to inconsistency, challenge and inefficiency. Specialist Provision Packages have the potential to improve equity if they are grounded in evidence about effective provision and real delivery costs.

However, as outlined in Q7, the success of these packages will depend crucially on whether they provide adequate flexibility to be tailored to the complexity of pupil needs, whilst ensuring greater consistency in support between pupils.

23 EHCPs guaranteeing educational provision set out in a Specialist Provision Package, with day-to-day provision captured in Individual Support Plans

While our evidence supports the need to reform the current EHCP system, it is not clear whether the plans, as they are set out in the consultation, will lead duplication, inconsistency and confusion between the documents. For proposals to work effectively, it will be necessary to more clearly articulate how the documents will overlap, and how proposals will address inequities in the current system without simply increasing the administrative burden on SENCOs and schools and increasing complexity.

24 Specialist Provision Packages and EHCP assessments for children under 5 with complex needs

NFER evidence suggests that the effectiveness of earlier routes into specialist support will depend on the clarity of thresholds, timeliness of processes and strong coordination between services, rather than simply introducing a faster pathway. While our research has not focused specifically on early years, findings from later stages show that delays, inconsistent criteria and fragmented systems are key drivers of inequity and escalation.

To work effectively, a direct route must have clear and consistently applied criteria for access, so that children with similar levels of need receive comparable responses regardless of locality. Evidence from our high-SEND schools research shows that variability in thresholds leads to unequal access and uncertainty for families and professionals.

Finally, NFER research indicates that early routes will only be effective if they are supported by sufficient specialist capacity. Without this, earlier identification of need may lead to quicker identification of gaps in provision, rather than improving outcomes.

25 What should be considered as part of the needs assessment

NFER evidence suggests that effective needs assessments depend on drawing on multiple sources of evidence, applied consistently and transparently. Variation in thresholds and assessment approaches is a key driver of inconsistency and dispute across the SEND system. Assessments should therefore incorporate a combination of:

- School-based evidence, including observations, attainment data, and responses to interventions within a graduated approach;
- Family and pupil perspectives, which provide critical insight into how needs present across contexts;
- Relevant professional input, such as educational psychologists or therapists, particularly where needs are complex or less well understood.

NFER's research also highlights that, despite inconsistencies in identification across settings, many schools already report drawing on a range of inputs to identify SEND needs. For reforms to achieve greater consistency, it is crucial that careful thought is not only given to guidance on which evidence sources should be used, but how they are used together to form a judgement about whether a child or young person required support.

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

NFER evidence suggests that placement decisions are shaped not only by individual pupil need but also by system capacity, school characteristics and approaches to inclusion across schools. To support equitable and sustainable outcomes, local authorities should therefore consider a range of factors beyond basic fit.

First, there should be a clear match between a setting's expertise and the child's needs, including staff experience, available provision, and the setting's capacity to deliver required support.

Second, local authorities should take account of current school capacity and cumulative SEND concentration. NFER research demonstrates that a minority of schools often educate disproportionately high numbers of pupils with SEND. Repeatedly directing placements to these settings can create unsustainable pressure and reinforce uneven distribution. To achieve that, it will be critical that SEND capacity and inclusive ethos is developed across the school system.

Third, the availability of specialist provision is a critical factor. Where specialist places are limited, mainstream schools may be proposed as default options, even where needs exceed their capacity. This highlights the importance of considering system-wide sufficiency when proposing placements.

Overall, the evidence suggests that placement decisions should balance individual need with system-level sustainability, ensuring both a good fit for the child and fair distribution of responsibility across schools.

27 Information and support that parents need to make a decision about which setting will be best for their child

NFER evidence shows placement decisions are shaped not only by pupil need but also by system constraints, school reputation and availability of specialist places. Inclusive schools are often consulted repeatedly, even where capacity is stretched.

Parents need clear, accessible information about what different settings can realistically provide, how decisions are made and how support will be delivered in practice. Transparency supports trust and reduces adversarial behaviour, while unclear expectations increase challenge and dissatisfaction.

There is also a need for information and guidance to support informed decision-making, including, where necessary, constructively challenging assumptions about what constitutes the most appropriate setting. For example, in our high-SEND schools research, parents often expressed a preference for smaller settings, perceiving these as better suited to meeting their child's needs. However, high-SEND schools, which are often smaller than average, sometimes reported challenges in identifying appropriate space and facilities to meet complex needs. At the same time, local authority staff noted that larger schools, which may have more extensive facilities and capacity, could be overlooked.

This highlights the importance of providing balanced, evidence-informed guidance to families about the relative strengths and limitations of different settings, to support decisions that are aligned with both pupil need and the practical realities of provision.

28 The appropriate maximum length of time for a temporary placement in Alternative Provision (AP) schools

The appropriate length of time for a temporary placement in AP will depend on the circumstances of the young person and the goal of the placement. Alternative provision varies enormously; pupils' needs vary and are often acute by the time they attend alternative provision, and children spend different lengths of time in alternative provision.

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

While we are broadly supportive of proposal for schools to publish an Inclusion Strategy Report, it will be crucial that any new accountability for schools balances workload and administrative requirements for SENCOs, against ensuring that funding is spent appropriately.

However, a more fundamental issue is how schools are held accountable for their intake of pupils with SEND, not only those who are already on roll. Our research on high-SEND schools shows this is critical to ensuring that all schools prioritise inclusion and contribute fairly across the system.

31 Whether SEND funding should sit directly within mainstream budgets

The evidence from NFER research suggests that placing more SEND funding within mainstream budgets has the potential to support earlier and more flexible intervention, but

only if it is designed to reflect the uneven distribution of SEND across schools and is accompanied by appropriate safeguards.

Our research on high-SEND schools shows that pupils with SEND are not evenly distributed across the system. A minority of mainstream schools educate a disproportionately high share of pupils with SEND, including those with EHCPs. These schools absorb significant additional cost and workload, frequently without commensurate funding. In this context, simply increasing the proportion of SEND funding devolved to mainstream settings, without adjustment for concentration effects, risks reinforcing existing inequities.

Overall, we would advocate for a cautious approach: placing more SEND funding in mainstream budgets could enable earlier, more flexible support, but only if funding levels reflect variation in need between schools and are accompanied by clear accountability, monitoring of SEND distribution, and mechanisms to mitigate further concentration.

32 Every school becoming part of a local SEND group

While coordination at the local level will be crucial to the success of the reforms, it is critical that there is consistency in how local groups function. Evidence from NFER's MAT Factor study highlighted the challenges faced by trusts in navigating inconsistencies in SEND processes across different local areas. NFER's research also shows that many multi-academy trusts already draw on their structures to jointly commission support and expertise. These are key considerations in ensuring that this proposal aligns with the aim for all schools to be part of high-quality, community-based trusts.

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

NFER research on high-SEND schools shows that families' ability to secure support is often shaped by how well they understand thresholds, processes and available provision, contributing to unequal outcomes. To support greater fairness, information and guidance should clearly explain:

- What support is available at each layer (Universal, Targeted, Targeted Plus and Specialist), and what children and families can reasonably expect;
- How decisions are made, including thresholds for accessing different types of support and the factors considered in placement decisions;
- Roles and responsibilities across education, health and local authorities, so families know who is accountable for provision.
- How decisions about placement and support can be queried and challenged.

The evidence also highlights the importance of consistency across local areas and settings. Clear, standardised guidance helps reduce this reliance and supports more equitable access.

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