

WSPCF National SEND White Paper Response 180526

West Sussex Parent Carer Forum (WSPCF) welcomes the opportunity to respond to this consultation. This response is informed by extensive engagement with parent carers across West Sussex, including survey data, targeted engagement activity, and contributions gathered through an open Padlet consultation exercise.

Across all engagement, there is a clear and consistent message from families, **that the core challenges within the SEND system are not primarily about a lack of policy or frameworks, but about how those systems are experienced in practice.**

Parent carers describe a system where:

- Support is frequently delayed until needs escalate or children reach crisis point
- Children are effectively required to struggle, fail, or become distressed before meaningful support is put in place
- Services are fragmented and difficult to navigate, with families often required to coordinate support themselves
- Plans and entitlements do not consistently translate into support being delivered in practice

This results in significant and cumulative impact on children, young people and their families, including deterioration in mental health and wellbeing, loss of education, financial strain, and long-term negative outcomes.

Parent carers consistently emphasise that these challenges are not solely the result of individual services or professionals, but reflect system-wide issues of capacity, consistency and accountability. While training and guidance are important, families are clear that the primary barrier is the lack of time, staffing, specialist input and resource across the system to deliver support effectively and consistently.

There is also a strong and consistent message regarding trust and participation. Families report that engagement (if it happens) often feels late, unclear, or tokenistic, particularly where their feedback is not visibly linked to change. Many describe only feeling heard when concerns are escalated through complaints or tribunals. As a result, confidence in the system is significantly undermined.

Despite these challenges, parent carers are clear that they want to be active partners in shaping better outcomes. Across all engagement, families consistently call for:

- Earlier, proactive intervention before needs escalate
- Genuine co-production, with lived experience informing decisions from the outset
- Clearer accountability, ensuring that agreed support is actually delivered
- Joined up working across education, health and care
- Transparent communication, including clear feedback on how parent carer input influences decisions

Importantly, WSPCF evidence demonstrates that many of the proposed reforms align conceptually with what families are asking for. However, there is significant concern that structural or terminology changes alone will not improve outcomes unless the underlying issues of resourcing, capacity and accountability are addressed.

Without this, there is a risk that reforms are experienced by families as a continuation of existing problems under new structures, rather than meaningful change. This response therefore reflects both:

- the shared priorities identified across parent carer engagement, and

- the critical system conditions required to ensure these proposals translate into real-world improvements for children, young people and families.

Across all aspects of these proposals, a consistent theme from families is the importance of clarity, accountability and enforceability. Parent carers are clear that while structural reform may simplify the system in principle, improvements will only be realised if there is clear alignment between legal entitlement and day-to-day delivery of support. Without this, there is a significant risk that changes may alter how support is described, without improving how it is experienced in practice.

Consultation Questions

Question 1

We want children, young people and their families to be involved in making better, evidence-based decisions about SEND, both in their local area and across the country. How can we make sure children, young people and their families have a genuine say in these decisions?

Evidence from WSPCF engagement shows that families are highly motivated to contribute to improving SEND services, but current systems of participation are not experienced as accessible, timely, or meaningful.

Across survey responses and wider engagement, parent carers consistently report that:

- Engagement often happens after decisions are already formed
- Feedback is not visibly linked to change
- Participation requires time, energy and confidence that many families do not have

Parent carers describe significant barriers including:

- Caring responsibilities and exhaustion
- Managing complex needs and crises
- Work pressures, financial strain, and limited childcare
- Digital access challenges

Families state clearly that:

- They want to be involved more and earlier in decision making processes
- They need flexible engagement opportunities (short surveys, online, recorded, asynchronous)
- They require clear feedback loops showing “you said, we did”

There is also consistent feedback that families do not understand who makes decisions and at what level, which reduces trust and engagement.

WSPC’s position is that genuine participation requires:

- Early co-production, not late consultation
- Recognition of lived experience as equal to professional and system data
- Transparent communication about what can and cannot change
- Ongoing engagement models, not one-off consultation exercises
- Clarity on roles, decision-making and influence at local and national level

WSPCF evidence highlights that this is not only a participation issue, but a foundational issue for SEND reform. Without co-production being clearly defined, embedded and resourced from the outset, it limits how effectively plans can be shaped, prioritised and adapted in response to lived experience

Question 2

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

Parent carers consistently report that current decision-making systems rely heavily on performance data, financial modelling and professional assessments. While these are important, families are clear that this evidence alone does not capture the reality of how SEND systems are experienced in practice.

Across WSPCF evidence, there is a consistent message that lived experience both explains and contextualises system pressures that are otherwise only visible as data trends.

For example, increases in EHCP applications, tribunal appeals, school attendance concerns and crisis-level need are often understood at a system level in numerical terms. However, families describe these not as isolated metrics, but as the direct result of unmet need, delays in support, and barriers to accessing services.

Survey responses and engagement data show that families frequently:

- Reduce or leave employment to support their child
- Fund private assessments due to long waiting lists
- Manage significant risk at home when services are unavailable

Parent carers also describe:

- Delays in receiving support
- Fragmented services requiring them to coordinate care
- Escalation of needs due to lack of early intervention

These experiences provide critical context for understanding system demand. Without this lived experience evidence, the drivers behind increased demand and escalating need remain largely invisible within formal systems.

Examples from WSPCF evidence include families describing long waiting times for CAMHS and therapy services, during which children's needs escalate significantly, sometimes to crisis point, before support is provided. Families also describe the cumulative impact of these delays, including the need to seek private assessments, reduced family income, and increased emotional and mental health strain across the household.

WSPCF evidence is clear that lived experience is not simply anecdotal, but a vital form of system intelligence. For it to inform decision-making effectively, it must not only be collected but actively listened to and believed.

Families consistently report that their experiences are sometimes dismissed, minimised, or treated as secondary to professional opinion or system data. This undermines both trust and the quality of decision-making.

WSPCF position: High-quality evidence must include lived experience as core system intelligence with triangulation of:

- quantitative data
- service performance
- qualitative family insight
- Continuous thematic analysis across engagement activities

This combined approach enables decision makers to understand not only what is happening within the SEND system, but why it is happening, and what impact it is having on children, young people and families.

Question 3

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

Parent carers broadly support strengthening the Universal offer but consistently report a significant gap between policy and practice. Across WSPCF evidence, families describe a system where expectations are not consistently delivered, leading to a “postcode lottery” of provision. Experiences vary widely between schools and are often shaped by individual staff knowledge, confidence and willingness to adapt, rather than by a clear and consistently applied standard of support.

Parent carers describe common experiences including:

- Difficulty accessing reasonable adjustments
- Delays in support being put in place
- Reduced timetables
- Children experiencing distress within school environments

There is a strong and consistent theme that support is not reliably needs-led. Families report that access to support often depends on how willing a school is to adapt, rather than being secured through consistent application of rights and expectations.

Parent carers also highlight that legal entitlements and existing guidance do not consistently translate into practice. While frameworks, duties and expectations already exist within the current system, families’ experiences demonstrate that these are not reliably implemented or enforced.

However, WSPCF evidence also shows that where Universal provision works well, it can be highly effective. Parent carers describe positive experiences where:

- Teaching approaches are flexible and adapted to need
- Staff understand neurodiversity and mental health
- Adjustments are made early, without the need for escalation
- Children feel safe, understood and able to participate

These examples demonstrate that effective Universal provision is already achievable within existing structures. The difference is not the absence of guidance, but the consistency with which it is applied. Across all datasets, the central issue is not a lack of policy, but a lack of clarity, consistency and accountability in how that policy is delivered in practice.

WSPCF position: A strong Universal offer requires:

- Consistent and clearly defined expectations across all settings
- Embedded inclusive practice across whole-school systems
- High-quality training alongside cultural change
- Clear accountability mechanisms to ensure provision is delivered
- Transparent monitoring of whether children are actually receiving support

Without clear accountability and enforcement, existing expectations do not translate into consistent practice. Strengthening the Universal offer requires not only defining what should be in place but ensuring there is a clear framework for how this is implemented, monitored and acted upon when it is not delivered. Children should not depend on luck, postcode or individual relationships to access basic support.

Question 4

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

WSPCF evidence shows that children who will likely be in the Targeted layer often experience significant barriers to accessing support.

Parent carers consistently report:

- Long waiting lists for services (CAMHS, SALT, OT, assessments)
- Inconsistent thresholds and eligibility criteria
- Delays in referrals and intervention

Families describe children:

- Being identified as needing support
- But waiting extended periods before receiving any intervention

There is also a strong theme of:

- Needs escalating during these delays
- Children falling behind academically and socially
- Increasing mental health difficulties

Parent carers frequently report:

- A lack of clarity about pathways
- Being signposted incorrectly
- Needing to repeatedly follow up and chase services

WSPCF position:

Children in the Targeted layer require:

- Faster access to support
- Clear, consistent pathways
- Early intervention before needs escalate
- Coordination between services

Support must be:

- Needs-led, not threshold-driven
- Preventative, not reactive

Question 5

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

Parent carers describe significant challenges for children whose needs exceed school-based support but do not meet thresholds for specialist provision.

Across WSPCF evidence:

- Families report being “stuck between services”
- Children are often deemed:
 - “not severe enough” for one service
 - “too complex” for another

This results in:

- Delays in support
- Escalation of needs
- Families managing increasingly complex situations without adequate help

There is compelling evidence that:

- Multi-agency working is not functioning effectively
- Communication between services is poor
- Parent carers are required to act as coordinators

Parent carers describe:

- Repeating their child’s story multiple times
- Managing communication between education, health and social care
- Significant emotional and administrative burden

WSPCF position:

Effective Targeted Plus support requires:

- Joined-up, multi-disciplinary approaches
- Clear accountability across agencies
- Single points of contact for families
- Flexible support based on individual need

Without this, children remain in a gap between services, and needs escalate unnecessarily.

Question 6

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

Parent carers consistently report delays and challenges in accessing appropriate specialist provision.

WSPCF evidence shows:

- Children often remain in unsuitable placements while awaiting specialist support
- Families experience lengthy assessment and decision-making processes
- Deterioration in wellbeing occurs during delays

Parent carers describe:

- Increased anxiety and distress
- School refusal and breakdown of placements
- Extended periods out of education

At crisis point, families report:

- Managing significant risk at home
- Reducing working hours or leaving employment
- Emotional and financial strain

However, where specialist provision is accessed, parent carers describe:

- Significant improvements in wellbeing and engagement
- Positive outcomes in smaller, more adaptable environments
- Integrated therapeutic and educational support

WSPCF position:

Children in the Specialist layer require:

- Timely access to appropriate provision
- Clear, transparent decision-making
- Planning based on need, not delay or crisis
- Sufficient capacity within specialist settings

Delays in accessing specialist support result in avoidable harm to children and families.

Question 7

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

Across WSPCF evidence, families consistently report that mental health and wellbeing deteriorate when children's needs are not understood or supported early.

Parent carers describe experiences where:

- Support is delayed until crisis point
- Attendance is prioritised over wellbeing
- Children are expected to cope in environments that do not meet their needs

Families highlight that mental health is often treated as separate from learning and participation, rather than a fundamental part of a child's ability to engage in education.

Parent carers describe:

- “the emotional turmoil of having to make your child go to school when they keep telling you they ‘just can’t do it’”
- Children masking at school and “exploding with emotions... after school because they can no longer hold it together”

Parent carers consistently link poor mental health to:

- Unmet needs
- Rigid school environments
- Lack of reasonable adjustments
- Pressure around attendance

Families report that wellbeing improves when:

- Children feel safe and understood
- Staff build trusted relationships
- Reasonable adjustments are implemented early
- Flexible approaches are taken to attendance and participation

Examples from parent carer responses include:

- Flexible timetables reducing anxiety
- Calmer environments supporting engagement
- Staff offering emotional support when needed

Families also highlight significant gaps in mental health provision, particularly:

- Long CAMHS waiting lists
- Short-term interventions that do not meet need
- Lack of provision for primary-aged children

WSPCF position: Effective support for mental health and wellbeing requires:

- Early identification and intervention
- Integration of mental health within SEND practice
- Flexible, needs-led approaches to attendance and participation
- Improved access to appropriate mental health services

Question 8

Do you agree that the refreshed ‘areas of development’ will support educators to understand and address barriers to learning and participation? Please explain your answer.

Families strongly support approaches that focus on understanding children's individual barriers to learning and participation. However, across WSPCF evidence, parent carers consistently report that identifying needs is not the primary issue, action in response to those needs is.

Parent carers describe:

- Needs being recognised but not acted upon
- Delays between identification and support
- Reliance on diagnosis before intervention

Families highlight that:

- Children with the same diagnosis present very differently
- Needs change over time
- Barriers are often complex and overlapping

Parent carers also raise concerns about children whose needs are less visible, including:

- Children who mask difficulties in school
- Children meeting academic expectations but experiencing high levels of distress

Examples include: "Teachers only recognise obvious traits... masking children fall through the cracks"

Parent carers emphasise that:

- Support must be based on need, not diagnosis
- Understanding alone is insufficient without consistent action

WSPCF position: The framework will only be effective if:

- It leads to earlier and consistent intervention
- It is applied flexibly to reflect individual children
- It does not create additional delay or reliance on diagnosis

Question 9

What arrangements would best support effective joint working between early years providers, Best Start Family Hubs, health, local authorities, and parent carers for children with SEND in the early years?

Parent carers consistently report that early years support is fragmented and difficult to navigate.

Families describe:

- Multiple referrals without coordination
Lack of communication between services
Having to act as the coordinator of care

Parent carers highlight that concerns are often identified early, but progression through systems is unclear.

Families state: "families are left trying to connect everything themselves"

Parent carers emphasise the importance of:

- Clear pathways following identification of need
- Joined-up working between education and health services
- Consistency of communication

WSPCF evidence shows that families value:

- Accessible support through community-based services
- Opportunities to connect with other families
- Staff who understand SEND and can provide guidance

WSPCF position: Effective joint working requires:

- Clear accountability across services
- Integrated pathways that reduce duplication
- Early intervention triggered by family concerns
- Recognition of parent carers as partners, not coordinators

Question 10

How can the early years foundation stage (EYFS) two-year old progress check and the Healthy Child Programme development review be improved so that children's needs are identified and supported more quickly? Please share examples.

WSPCF evidence raises the concern that families say they are not always listened to or believed when they first raise concerns around the needs of their children. However, in terms of these checks, parent carers also raised that identification is only the first issue, with what happens after concerns are raised being the next concern.

Parent carers report:

- Concerns being identified but not acted upon
- Lack of clarity on next steps
- Delays in accessing support following identification

Families consistently highlight the need for clear pathways following identification and joined-up working across services. They describe frustration where processes identify needs, but do not result in timely support.

WSPCF position: These reviews will be more effective if:

- They trigger clear and immediate pathways into support
- They are linked to coordinated service responses
- They reduce delay rather than adding another assessment point

Question 11

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

Across WSPCF evidence, families consistently report that current evidence used in systems does not fully reflect the reality of lived experience. Parent carers highlight that key aspects of SEND impact are not captured within existing data systems, including:

- The impact on family life
- Financial pressures and loss of income
- Emotional wellbeing and stress
- The cumulative effect of delays and unmet need
- Families describe:
 - “the impact on family life... a parent carer having to reduce their working hours (or stop completely)”
 - “the whole household becomes so unhappy and depressed because of all that external pressure”

Parent carers emphasise that without capturing these impacts, decision-making is incomplete and does not reflect the actual cost of unmet need. WSPCF evidence highlights three consistent priority areas:

1. Lived experience as core evidence:

Families consistently state that lived experience must be treated as equal to performance and financial data.

2. Outcomes for children and families:

Parent carers highlight the importance of measuring not just service delivery but whether support leads to improved wellbeing, participation and stability.

3. System impact on families:

Families report significant hidden costs, including financial strain, reduced employment and emotional stress.

WSPCF position: National Inclusion Standards must:

- Recognise lived experience as system intelligence
- Measure real-world outcomes for children and families
- Capture the wider impact of SEND systems on family life

Question 12

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

Parent carers consistently report significant variability in staff knowledge and understanding across education, health and wider services.

WSPCF evidence identifies key priority areas for training: Neurodiversity, including autism and ADHD, mental health and emotional wellbeing, trauma and attachment, understanding of masking, particularly in girls and reasonable adjustments and the Equality Act.

Parent carers describe:

- “Weak understanding of autism”
- “Teachers only recognise obvious traits”

Families also highlight the need for greater understanding of how SEND impacts behaviour and real recognition that behaviour is communication.

Parent carers report that lack of understanding results in:

- Inappropriate responses to children
- Punitive approaches to behaviour
- Failure to meet needs effectively

However, families are clear that training alone is not sufficient, and highlight inconsistent implementation of training and lack of accountability for applying learning in practice.

WSPCF position: Training must:

- Be high quality and delivered by specialists
- Be consistent and mandatory or embedded across all services
- Be linked to accountability for practice
- Support cultural change, not just knowledge acquisition

Question 13

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

Parent carers recognise the significant pressures on schools and staff, and there is strong empathy for the challenges educators and leaders face. However, families are clear that solutions must not reduce support for children and young people.

WSPCF evidence shows that families highly value:

- Clear communication
- Consistency of support
- Timely responses to concerns

At the same time, parent carers consistently report that inefficiencies within the SEND system increase workload for both staff and families, including:

- Fragmented communication across services
- Repeated processes and duplication of information
- Lack of clarity around roles, responsibilities and pathways

Families describe experiences such as:

- “having to repeat your story to different services”
- “being passed around the system”

These inefficiencies create additional administrative burden for staff, reduce time available for direct support, and contribute to delays in meeting children’s needs.

Parent carers highlight that workload pressures could be reduced through a more streamlined and coordinated system, including better alignment between education, health and care services.

Crucially, parent carers also emphasise that current expectations on teachers, educators and leaders are often unrealistic given existing resource constraints.

Families widely recognise that:

- Class sizes are often too large to meet diverse needs effectively
- There is insufficient access to learning support assistants and specialist staff
- Teachers are expected to manage increasingly complex needs alongside full teaching timetables
- Many educators hold additional responsibilities (e.g. SENCO, leadership roles) on top of their core role, without sufficient time or capacity

As a result, workload pressures are not solely driven by inefficient processes, but by a mismatch between expectations and available resource.

Parent carers are clear that without addressing this, reforms risk placing additional pressure on an already overstretched workforce, limiting their impact in practice.

WSPCF position: Practical actions should include

- Streamlining systems and reducing duplication
- Ensuring information is shared effectively between services so staff and families are not required to repeatedly provide the same details.
- Improving communication and coordination across services
- Clear, joined-up communication between education, health and care to reduce unnecessary workload and avoid gaps in provision.
- Establishing clear, transparent pathways and processes So staff understand how to access support quickly, reducing time spent navigating complex systems.
- Providing timely access to specialist advice and support, reducing delays and enabling early intervention, so staff are not left managing complex needs without appropriate guidance.
- Ensuring roles and responsibilities are clearly defined both within schools and across services, to reduce confusion and duplication of effort.
- Investing in early intervention, parent carers consistently report that delays in support increase both need and workload over time. Supporting children earlier reduces escalation and demand on staff.
- Creating time and capacity for meaningful collaboration, including protected time for planning, reviewing support and engaging with parent carers and professionals.
- Reviewing workforce capacity and resourcing, including:
 - Smaller class sizes where needs are higher
 - Increased access to teaching assistants and specialist staff
 - Sufficient non-contact time for staff with additional responsibilities (e.g. SENCO, leadership roles)
 - Recognition that supporting children with SEND requires dedicated time beyond classroom teaching

Question 14

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

Parent carers describe highly variable experiences of SENCO roles across settings.

In positive examples, families report:

- Clear communication
- Timely responses
- Effective coordination of support

However, many parent carers describe:

- Delays in communication
- Limited availability
- Lack of clarity around processes

Parent carers highlight that SENCO effectiveness is often limited by:

- Workload pressures
- Limited influence within school leadership
- Lack of access to external services

Families emphasise the importance of:

- SENCOs understanding wider pathways
- Clear communication with parent carers
- Strong relationships with families

WSPCF evidence also highlights that inclusion cannot sit with one individual alone.

Parent carers report that:

- Responsibility for SEND is often isolated within the SENCO role
- Whole-school understanding and implementation is inconsistent

WSPCF position: SENCO roles should:

- Have influence within leadership to shape whole-school culture
- Be supported with adequate time and resources
- Be connected to wider services and pathways
- Not hold sole responsibility for inclusion

Question 15

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

Parent carers consistently report that current plans often do not reflect the reality of their child's needs or the support they actually receive.

Families describe:

- Plans that are too general or unclear
- Inconsistent implementation of agreed support
- A need to repeatedly explain their child's needs across different settings and professionals

Parent carers emphasise that a high-quality plan should:

- Clearly describe the child's needs
- Specify what support will be provided
- Identify who is responsible for delivery
- Be regularly reviewed and updated

However, WSPCF evidence is clear that assurance for families goes beyond whether a plan is well written or contains the right information.

Families report significant frustration where plans exist, but the support outlined within them is not consistently delivered in practice. As a result, parent carers do not judge the quality of a plan by how it is written, but by whether it leads to meaningful change for their child.

Parent carers consistently describe the need for:

- Clear quality assurance of plans
- Ongoing monitoring of whether support is being delivered
- Accountability when provision is not implemented

WSPCF evidence shows that families judge quality based on impact, including whether:

- Support is consistently delivered as described
- Children's needs are met in day-to-day settings
- There is a measurable improvement in wellbeing, participation and outcomes

There is also a strong theme that the terminology or format of plans is less important to families than their effectiveness in practice.

WSPCF position: High-quality ISPs should:

- Be regularly reviewed and updated to reflect changing needs
- Be subject to clear quality assurance and monitoring processes
- Be consistently implemented in practice
- Include clear accountability when provision is not delivered

Most critically, high-quality ISPs must result in the delivery of support and improved outcomes for children and young people. Assurance for families comes not from the existence of a plan, but from confidence that what is written will be followed through and will make a meaningful difference in their child's everyday experience.

Question 16

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

Parent carers consistently report that plans are often difficult to translate into day-to-day practice.

Families describe:

- Having to repeatedly explain their child's needs across different settings
- Inconsistencies in how plans are interpreted and delivered
- Support varying significantly between staff

Parent carers emphasise that clarity is not just about format, but about how plans are developed, structured and used in practice.

Families report that plans are most effective when they:

- Clearly state what the child needs
- Identify what helps and what does not help
- Specify what support should be provided in practical terms
- Clearly identify who is responsible for delivering support

Parent carers highlight that plans are often too generic, and that key information is not consistently captured or shared between professionals.

WSPCF evidence also shows that inconsistency in how information is gathered contributes to variability in plan quality. Parent carers describe differences in what they are asked to provide, how their views are recorded, and how this informs the plan. Our evidence highlights the importance of structured and consistent parent carer input.

In West Sussex, WSPCF has worked in partnership with West Sussex County Council to develop an ISP parent carer information template. This provides clear guidance for parent carers on what information to include, in an equivalent way to the parent carers' views advice used within EHCP processes.

This ensures that key information about the child's needs, experiences and support is captured consistently, reducing variation and supporting the development of clearer, more usable plans for professionals.

Families also report that plans are more practical when:

- They are concise and focused on essential information
- They are easy to understand across services
- They follow the child across transitions

WSPCF evidence shows that transitions are a key point where plans fail to support continuity, with families describing support breaking down when children move between settings.

WSPCF position: Plans should:

- Be concise, accessible and easy to use in day-to-day practice
- Clearly set out needs, provision and responsibilities
- Be developed collaboratively with families
- Include structured and consistent parent carer input
- Be portable across settings and transitions

- Be regularly reviewed and updated

Question 17

How can we best support transition for young people into post-16 provision (education, training or employment)?

WSPCF engagement specifically focused on transition into adult services highlights more detailed and practical challenges experienced by families.

Families consistently describe a lack of clarity about pathways and processes at key transition points. Parent carers report needing clear, simple information about what happens from Year 11 onwards, including who is responsible for distinct aspects of support and what to expect at each stage.

Families highlighted the value of:

- A simple, easy-to-understand “one-page pathway” showing each step from Year 11 onwards
- Earlier and more predictable communication to reduce uncertainty

Parent carers also raised significant concerns about how services are structured and experienced during transition to adulthood. Families describe confusion about roles across Children’s Services, Lifelong Services, Transitions teams and Adult CarePoint, and uncertainty about who they should be contacting at different stages. A consistent theme is the experience of fragmentation, with families reporting:

- Multiple handoffs between teams
- Lack of clear points of contact
- Having to coordinate communication between services themselves

Parent carers also highlight:

- Delays in assessments and decision-making
- Long waiting times, with cases prioritised based on risk
- Inconsistent communication and lack of updates, particularly when there is no immediate progress

Families describe transitions feeling more manageable where there is:

- Clear and simple information about who does what across services
- Joined-up communication between teams
- Consistent timelines and updates
- Reliable systems for communication and record-keeping

Across all evidence, a consistent theme is that transition planning is too late, too fragmented and too narrowly focused.

Parent carers emphasise that effective transition requires:

- Planning that starts earlier and is sustained over time
- A broader focus on life outcomes, not just education placements
- Clear, joined-up pathways across education, health, care, employment and housing

WSPCF position: Effective transition support requires:

- Early, proactive planning starting well before key transition points
- Clear and accessible pathways across education, employment, housing and independence
- Joined-up working between children's and adult services, with clear roles and responsibilities
- Consistent communication and timely updates for families
- Reduced fragmentation and fewer handoffs between services
- Recognition of different definitions of success for young people
- Support for families so they are not required to coordinate systems themselves

Parent carers highlight that transition is not only a change in setting, but a significant increase in expectation around independence, which can be overwhelming for many young people with SEND. Families emphasise that preparation must go beyond qualifications and include life skills, confidence-building and gradual development of independence.

Parent carers are also clear that young people's needs do not end at age 16, and that loss or reduction of support at this stage creates significant risk of disengagement and poor outcomes.

Question 18

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

Parent carers express cautious concern about Inclusion Bases based on existing experiences of provision.

Families report:

- Variation in quality and approach across settings
- Concerns that provision may not meet the full range of needs

Parent carers emphasise that provision must be based on individual need rather than availability.

WSPCF evidence shows that families are concerned about:

- Capacity within local systems
- Consistency of provision across areas

Parent carers highlight the importance of:

- Access to appropriate support when needed
- Transparency in how decisions are made

WSPCF position: Inclusion Bases must:

- Be adequately resourced
- Be designed around children's needs
- Be consistent across areas
- Not create additional barriers to accessing support

Question 19

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

Parent carers consistently report that physical placement in mainstream settings does not guarantee meaningful inclusion.

Families describe:

- Children being present in school but unable to participate fully
- Experiencing distress, isolation and unmet need

Parent carers highlight that success should be measured by wellbeing and participation, not attendance alone

WSPCF evidence shows that families are concerned that:

- Inclusion Bases could become separate spaces within mainstream settings
Children may be physically included but socially isolated

Parent carers emphasise the importance of:

- Trusted relationships with staff
- Whole-school responsibility for inclusion

WSPCF position: Inclusion Bases will only be effective if:

- They are integrated into whole-school practice
- Staff across the school understand and support SEND
- Children are supported to participate fully in school life

Question 20

Through the Experts at Hand offer, we want to ensure that mainstream settings can get quick specialist support for children and young people. What arrangements are needed between local area partners (education, health, social care) to deliver this Experts at Hand offer effectively?

Through the proposed Experts at Hand offer, there is a clear intention to enable mainstream settings to access timely specialist advice and support. Parent carers strongly support this principle. However, WSPCF evidence highlights that the effectiveness of this offer will depend entirely on how it is implemented in practice, and whether underlying local system and workforce challenges are addressed.

Parent carers consistently report that access to specialist advice is currently delayed, inconsistent, and difficult to navigate. Families describe:

- Long waiting times for services
- Lack of clarity about referral processes
- Being passed between services

This reflects a broader pattern identified through WSPCF engagement, where families frequently experience fragmentation between education, health and social care, resulting in delayed support and increased pressure on both families and frontline staff. Parent carers emphasise that, in its current form, the system does not

operate in a sufficiently joined-up way to enable timely specialist input. As a result, mainstream settings are often expected to manage increasingly complex needs without appropriate expertise or support.

WSPCF's engagement highlights a critical concern, new initiatives such as Experts at Hand will not be effective unless existing system capacity and workforce constraints are directly addressed.

Parent carers consistently raise concerns that:

- Workforce capacity across education, health and care is already limited
- Specialist services are overstretched, with significant waiting lists
- Existing communication and coordination challenges are unresolved

There is a strong perception that, without additional investment and structural change, the Experts at Hand offer risks being experienced as:

- another layer within an already complex system
- or a service that exists in principle but is difficult to access in practice

Families are clear that reform must be deliverable in reality, not just in design, and they emphasise that for this offer to work effectively, it must address existing barriers by ensuring:

- Clear, accessible pathways into specialist support, so that schools and families understand how and when to access advice, without unnecessary delay or complexity
- Timely access to specialist input, early advice is critical to preventing escalation of need and reducing pressure on both staff and services
- Genuine coordination between services, education, health and social care must work in an integrated way, rather than operating in parallel

WSPCF position: Effective delivery of Experts at Hand requires

- Adequate workforce capacity across all partner agencies
Including sufficient specialist staff to respond in a timely way
- Clearly defined and consistent pathways
With transparent criteria, roles and responsibilities across services
- Strong multi-agency working arrangements
Including shared systems, joint planning, and clear communication channels
- Clear accountability mechanisms
So that it is evident who is responsible for responding, and within what time period
- Integration with existing systems and processes
Avoiding duplication and ensuring that this offer simplifies, rather than complicates, the system
- Ongoing feedback from families and settings
To monitor effectiveness, identify barriers, and ensure continuous improvement

Without addressing existing workforce pressures and capacity constraints, there is a significant risk that the Experts at Hand offer will not achieve its intended impact and may add further complexity to an already overstretched system.

Question 21

What needs to be in place so that children and young people with low incidence, highly complex needs can always access the right specialist placement?

Parent carers consistently report that access to appropriate specialist provision for children and young people with low incidence, highly complex needs is currently delayed, unclear and inconsistent.

Families describe:

- Multiple assessments without clear outcomes
- Prolonged periods in unsuitable placements
- Lack of transparency in decision-making

Parent carers highlight that delays in accessing specialist provision often result in:

- Deterioration in children's mental health and wellbeing
- Breakdown of placements
- Increased risk within the home environment

WSPCF evidence shows that families frequently feel required to repeatedly evidence and re-evidence their child's level of need, with parent carers describing: "having to fight for appropriate placement"

A central issue identified through WSPCF engagement is a system-wide shortage of appropriate specialist placements.

Parent carers consistently report that:

- The number of specialist placements available does not meet current demand
- Children remain in unsuitable placements due to lack of capacity, rather than appropriateness
- Decision-making is often influenced by what is available, rather than what is needed

This reflects a broader concern regarding long-term sufficiency planning, with families experiencing the impact of sustained gaps in specialist provision over time.

While parent carers recognise that new provision is being developed, there is a strong view that current capacity gaps cannot be addressed quickly, and will continue to affect children and young people in the short to medium term.

There is also significant concern about post-16 specialist provision, where families report particularly limited options for young people with the most complex needs.

Parent carers emphasise the importance of ensuring that efforts to address sufficiency do not oversimplify the issue.

There is concern that:

- Increasing access to mainstream provision alone will not resolve capacity issues for this group
- Children with highly complex needs require specialist environments, expertise and resourcing that cannot always be replicated in mainstream settings

While improving inclusion in mainstream schools is important, families are clear that this must not lead to: children with highly complex needs being expected to remain in or return to settings that are unable to meet their needs

What families say needs to be in place

Parent carers consistently emphasise that the following are critical:

- Timely and transparent decision-making, so that families understand how decisions are made and do not experience unnecessary delay
- Clear and consistent pathways into specialist provision, including clear thresholds and criteria
- Provision based on need, not availability, ensuring that placement decisions are driven by the child or young person's needs

WSPCF position: Systems must ensure

- Early identification of highly complex needs, so that planning for appropriate provision can begin as early as possible
- Robust and forward-looking sufficiency planning including sufficient specialist placements across all phases, particularly post-16
- Sufficient specialist capacity across the system recognising that current shortfalls cannot be addressed without sustained investment
- Clear, consistent and transparent processes so families understand pathways and do not need to repeatedly evidence need
- Decisions that are needs-led and not constrained by current system pressures
- Joined-up commissioning across education, health and social care to ensure that specialist provision fully reflects the complexity of need

Without addressing long-standing gaps in specialist capacity and sufficiency planning, there is a significant risk that children and young people with the most complex needs will continue to experience delays, inappropriate placements, and unmet need.

Question 22

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

Parent carers express concern about the potential for rigid categorisation within Specialist Provision Packages, particularly where these are aligned to the four broad areas of need currently recognised within the SEND framework. Families consistently emphasise that:

- Children and young people rarely fit neatly into a single category of need
- Needs are often complex, overlapping and interdependent
- Needs change over time, sometimes significantly

WSPCF evidence shows that children with similar diagnoses can present very differently and require highly individualised approaches to support. Many children experience needs across multiple areas, and some across all four broad categories.

Parent carers highlight that the current system (including Education, Health and Care Plans) already requires identification of a “primary need”, which can:

- Oversimplify a child’s profile
- Lead to inappropriate or incomplete support
- Influence provision based on categorisation, rather than the full range of need

There is significant concern that Specialist Provision Packages, if designed around fixed categories, may embed and reinforce these existing limitations, rather than resolving them.

- Families report that rigid thresholds and criteria already create barriers, particularly where:
- Needs do not align clearly to a single category
- Children present with mixed or emerging needs
- Eligibility is determined by fitting predefined criteria, rather than assessed need

Parent carers also raise concern that Specialist Provision Packages may effectively replicate existing challenges under a different structure, rather than addressing them. There is a strong view that the issue is not simply the format of plans or packages, but whether support is actually delivered, coordinated and responsive in practice.

Parent carers consistently report that EHC Plans could be effective if they were consistently implemented and enforced. There is concern that introducing a new framework without addressing these underlying issues risks:

- Creating additional layers of process
- Without improving outcomes for children and young people

What families say is needed

To be effective, Specialist Provision Packages must move beyond categorisation and reflect the real complexity of children’s needs. Parent carers emphasise the importance of:

- Holistic, needs-led assessment
Recognising the full range and interaction of needs, rather than assigning a single primary category
- Flexibility and responsiveness
Allowing provision to adapt as needs change over time

- Co-production with families and young people
Ensuring packages reflect lived experience and are meaningful in practice
- Clarity without restriction
Providing clear pathways while avoiding rigid thresholds that exclude those with complex or mixed needs

WSPCF position: Specialist Provision Packages must

- Be designed around the whole child, not a single category of need
- Allow for multiple and interacting needs to be recognised equally
- Remain flexible and responsive over time as needs change
- Avoid creating additional access barriers through rigid thresholds or criteria
- Be co-produced with families and young people
- Be supported by clear accountability for delivery, ensuring that agreed provision is consistently implemented in practice

Without moving beyond rigid categorisation and without addressing existing issues around implementation and accountability, there is a significant risk that Specialist Provision Packages will replicate current challenges rather than improve outcomes.

Question 23

We propose that EHCPs will guarantee educational provision set out in a Specialist Provision Package, with day-to-day provision captured in Individual Support Plans. What is needed to make these proposals work effectively?

Parent carers consistently identify accountability, clarity, and enforceability as critical concerns within the proposed changes.

Families report:

- Uncertainty about how new systems will operate in practice
- Concerns about potential loss of legal protections
- Lack of clarity regarding who is responsible for delivering support

Parent carers emphasise that support must be clearly defined, consistently delivered, and enforceable when it is not in place.

WSPCF evidence shows that breakdowns in support often occur due to:

Poor communication between services

Lack of coordination across education, health and care

Limited accountability when provision is not delivered

Families describe experiences such as:

- “being passed between services”
- “lack of accountability when support is not delivered”

A central concern raised by parent carers is the proposed distinction between:

- EHCPs as the legal guarantee of provision (via Specialist Provision Packages)
- Individual Support Plans (ISPs) as the record of day-to-day support

While parent carers welcome clarity around entitlement, there is significant concern that this separation may weaken accountability in practice. Current evidence suggests that:

- EHCPs provide clear, legally enforceable protection
- ISPs may not carry the same level of enforceability or redress if provision is not delivered

This raises a critical risk: If the detail of day-to-day support sits within ISPs rather than the EHCP, there is potential for a gap between what is legally guaranteed and what is actually delivered.

Parent carers are clear that:

- It is not enough for support to be defined at a high level
- Delivery must be equally enforceable, visible and accountable

Without this, families may continue to experience:

- Inconsistent implementation
- Lack of recourse when provision is not in place
- Increased need to escalate concerns to secure support
- Parent carers also emphasise that for this model to work effectively:
- Roles and responsibilities must be clearly defined across all partners including who is accountable for:
 - designing provision
 - delivering provision
 - monitoring delivery
- There must be clear, accessible routes for challenge and escalation where provision is not delivered as agreed
- Systems must be:
 - joined-up across education, health and care
 - transparent to families
 - consistent in how they operate across areas

What families say is needed

Parent carers highlight that the success of these proposals depends on:

- Confidence that agreed support will be delivered in practice
- Transparency about how decisions are made and reviewed
- Clear communication with families at every stage

WSPCF position: For proposals to work effectively

- Legal protections must be maintained and clearly applied to both entitlement and delivery
Ensuring there is no gap between what is guaranteed (via EHCP) and what is delivered (via ISP)
- Accountability must be explicit, enforceable and visible across the system
Including clear responsibility for delivery and clear routes for escalation
- Individual Support Plans must have sufficient status, clarity and oversight
to ensure that day-to-day provision is implemented consistently and can be challenged if not delivered
- Systems must be fully joined-up across education, health and care
with shared responsibility for outcomes
- Families must clearly understand how the system works and how their rights are protected

Without clear alignment between legal entitlement and day-to-day delivery, and without robust mechanisms for accountability and enforcement, there is a significant risk that these proposals will not improve outcomes for children and young people and may reduce confidence in the system.

Question 24

We propose creating a more direct route to Specialist Provision Packages and EHCP assessments for children under 5 with complex needs. How can we make sure this works in practice?

Parent carers consistently report that early years pathways are fragmented, complex and difficult to navigate.

Families describe:

- Multiple referrals and assessments
- Lack of coordination between services
- Delays in accessing support

Parent carers emphasise that early intervention is critical and support must follow identification without delay or unnecessary process. WSPCF evidence shows that families in the early years often take on the role of coordinating services themselves, leading to increased stress and delayed access to appropriate support.

Parent carers are clear that any new pathway must:

- Reduce delay and bureaucracy, rather than introduce additional layers
- Avoid requiring families to repeat lengthy processes to evidence needs that are already well understood

Early years evidence consistently shows that when needs are clearly identified, families value swift, coordinated action, rather than repeated assessment cycles. While a more direct route is welcomed, parent carers emphasise that this must not become a standardised or streamlined process that loses sight of the individual child. Families are clear that:

- Decisions must remain personalised and needs-led
- Support should be developed with families, not around them

Co-production in the early years is particularly critical, as families often hold the most detailed understanding of their child's development and needs. Parent carers strongly emphasise that early identification must be matched by regular and meaningful review. Current experience shows that plans developed at a very young age can quickly become outdated and changes in need are not always reflected as children transition through early years into school.

Families highlight that without consistent review:

- Support may no longer reflect the child's needs
- Gaps in provision can emerge over time

A more direct route must therefore be accompanied by a clear commitment to regular, responsive review processes that allow provision to evolve as the child develops

Parent carers consistently highlight the importance of:

- Clear and simple pathways into support
- Joined up working between education, health and care services
- Timely, transparent decision-making
- Confidence that identified needs will lead directly to support

WSPCF position: Early routes must

- Be clearly defined, consistent and easy to navigate
- Reduce duplication, delay and unnecessary assessment processes
- Enable early, needs-led access to Specialist Provision Packages where appropriate
- Ensure coordinated, multi-agency working from the outset
- Be co-produced with families, recognising their expertise and central role
- Include regular, meaningful review mechanisms, so provision remains up to date and responsive to changing needs

A more direct route will only be effective if it reduces delay without reducing personalisation, and if early decisions are matched by ongoing review and accountability for delivery.

Question 25

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

Parent carers are broadly clear and consistent about what should be included within a needs assessment. There is a general expectation that assessments will draw on a range of evidence, expert advice and professional input to build a comprehensive understanding of a child or young person's needs.

Families value the current approach where assessments bring together information from across education, health and care, including input from relevant professionals. When undertaken effectively, parent carers consider this to be a robust and holistic process. However, parent carers emphasise that a needs assessment must go beyond professional evidence alone. It is essential that it also incorporates the voice of the child or young person and the knowledge and experience of parent carers and carers

Families are clear that they often hold the most detailed understanding of their child's needs, particularly where these may not be fully visible in formal settings. Co-production within the assessment process is therefore critical to ensuring an accurate and meaningful understanding of need. While there is general confidence in what a needs assessment should include, WSPCF evidence shows that parent carers' primary concern is not the content of assessments, but access to them.

Families consistently report:

- Difficulty meeting thresholds for assessment
- Delays in being able to access assessment processes
- The need to provide significant evidence before assessment is agreed

As a result, many parent carers feel that they must "prove" their child's needs repeatedly before being granted access to a formal assessment

Parent carers emphasise that:

- When assessments are carried out, they are often helpful and valued
- The challenge lies in getting to that point in a timely and equitable way

Parent carers highlight that effective needs assessments should:

- Draw on multi-agency professional expertise across education, health and care
- Be holistic and comprehensive, reflecting the full range of needs
- Include meaningful input from families and children and young people
- Be undertaken in a way that is timely, proportionate and accessible

WSPCF position:

- Needs assessments should continue to include robust, multi-agency evidence and professional input
- The voice of the child and family must be central, not supplementary

- Processes should be co-produced, transparent and clearly explained
- Thresholds and pathways should be reviewed to ensure equitable and timely access to assessment

Parent carers are clear that the value of a needs assessment lies not only in its content, but in the ability to access it when it is needed. Ensuring timely and fair access to assessment is therefore as important as the quality of the assessment itself.

Question 26

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

Parent carers describe placement decisions as one of the most significant and challenging aspects of the SEND journey. Families report limited confidence in placement recommendations, particularly where it is unclear whether decisions are genuinely needs-led or how they have been reached. A lack of transparency and consistency continues to undermine trust.

While parent carers recognise that providing a list of potential settings could help improve awareness of available provision, there is significant concern that this could limit parent carer choice. Families are clear that such lists must support informed decision making, not define or restrict it. There is a risk that lists may reflect current capacity rather than suitability, omit appropriate settings, or disproportionately favour certain types of provision, which could lead to placement options being perceived as more limited than they are.

Parent carers also highlight concerns about how lists are communicated in practice, particularly where settings included may not have capacity. This can raise expectations that cannot be met and further reduce confidence in the system.

Families consistently emphasise that placement decisions must be transparent carer, clearly explained, and based on the individual child or young person's needs. They value opportunities to understand how settings operate in practice, including visits and direct engagement, and expect to be involved as equal partners in decision-making.

WSPCF position: Local authorities should ensure that any list of settings is clearly presented as guidance rather than a restriction, with decisions firmly rooted in need rather than availability. Information shared must be accurate and reflect real provision and capacity. All suitable options should be considered, and families must be fully involved in decisions, with clarity about how recommendations are developed.

In summary, greater clarity is welcomed, but it is essential that this strengthens informed choice rather than constraining it, and that placement decisions remain transparent carer, needs-led and built in partnership with families.

Question 27

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

Parent carers consistently report that they are required to make significant decisions about placements with limited, unclear, or inconsistent information. Many families describe difficulty accessing reliable, up-to-date information and report a reliance on informal networks, such as other parent carers, to understand what settings are really like in practice.

WSPCF evidence shows that families value honest, practical information over formal documentation, with a strong emphasis on understanding whether their child will feel safe, supported and included, and how provision is delivered on a day-to-day basis.

Parent carers highlight the importance of:

- Clear, accessible information about the support available within settings
- A realistic understanding of school environments
- Opportunities to visit and engage directly with providers

Families emphasise that information alone is not enough. Parent carers need independent support to interpret information, understand their options and navigate complex decisions. WSPCF evidence highlights the critical role of SEND Information, Advice and Support Services (SENDIAS) in providing impartial guidance. However, these services are woefully under resourced and unable to meet demand consistently.

At the same time, parent carers consistently turn to informal peer networks to fill this gap. Parent Carer Forums play a key role in:

- Sharing lived experience
- Providing practical insight into how settings operate in reality
- Supporting families to feel more confident in decision-making

This reflects a wider system need families are already seeking out trusted, experience-based support where formal systems do not fully meet their needs

WSPCF position: Parent carers need

- Accessible, clear, impartial and accurate information, including what provision looks like in practice
- Opportunities for meaningful engagement with settings, including visits and direct discussion
- Independent, trusted support to navigate decision-making, with SENDIAS properly resourced and recognised as a core part of the system
- Recognition of the value of lived experience and peer support, especially the role of Parent Carer Forums
- Transparency about what provision will be delivered, not just what is described

Parent carers are clear that making informed placement decisions requires not only better information, but access to trusted, independent and experience-based support. Strengthening both formal services such as SENDIAS and the role of PCF parent carer led support will be critical to enabling confident, informed choices.

Question 28

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

Parent carers report highly variable experiences of Alternative Provision, with outcomes largely dependent on how well placements match individual needs. While some families describe positive outcomes where provision is appropriate and well-supported, others highlight significant challenges, particularly where placements remain temporary or uncertain over extended periods.

A consistent theme across WSPCF evidence is that uncertainty itself can be as harmful, if not more so, than the length of time a child spends in Alternative Provision. Families describe how ongoing instability, without clear planning or direction, can increase anxiety, undermine progress and contribute to additional emotional distress and trauma for children and young people.

Parent carers emphasise that children progress at different rates and that a fixed or time-limited approach to Alternative Provision may not reflect individual needs or circumstances. Arbitrary time frames risk prioritising system process over the child's development and may lead to transitions that are not well-timed or appropriate.

Families consistently highlight the importance of stability, clear planning and forward progression, with a strong preference for approaches that focus on long-term outcomes rather than short-term placements. WSPCF evidence also suggests that the use of Alternative Provision can sometimes reflect challenges within mainstream settings in meeting need, rather than solely the needs of the child or young person. As such, there is a need to better understand when and why Alternative Provision is used, in order to both strengthen inclusive practice in mainstream settings and inform sufficiency planning for specialist provision.

WSPCF position: Decisions about the use and duration of Alternative Provision should be individualised and based on the child or young person's progress and needs, rather than fixed time frames. Approaches must prioritise stability, clarity and long-term planning, ensuring that children are not left in prolonged uncertainty. Greater transparency around the purpose and intended outcomes of placements is essential, alongside a system-wide focus on ensuring that Alternative Provision is used appropriately and effectively within a broader continuum of support.

Question 29

We have set out our plans to regulate Independent Special Schools (ISS) sector. Do you agree that these proposed changes will lead to suitable placements being available at a fair cost? Please explain why.

Parent carers rarely describe independent provision as a preferred first option, but instead, as something accessed after significant unmet need and limited suitable local provision. Families consistently prioritise access to the right placement over cost considerations.

There is recognition that stronger regulation of the independent sector could improve quality, consistency and fairness of cost, particularly where provision is currently uneven. However, parent carers are concerned that regulation focused on reducing costs or placements, without increasing local capacity, may further limit options for children and young people.

WSPCF evidence shows that the independent sector often fills gaps where local provision is insufficient, particularly for children with more complex needs. Restricting access without viable alternatives risks increasing delays and leaving children in unsuitable placements.

WSPCF position: Regulation should be accompanied by a clear and accelerated focus on increasing local specialist provision. Decisions must remain needs-led, with sufficient capacity across the system to ensure children can access appropriate placements in a timely way. Improved regulation alone will not deliver suitable placements at a fair cost unless it is matched by increased local provision and a commitment to meeting need first.

Question 30

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

Parent carers consistently report a lack of transparency around how Inclusive Mainstream funding is used. Families describe variation in support between settings and uncertainty about what should be available, with many reporting that funding does not always translate into visible or consistent support for children and young people.

WSPCF evidence shows that families are seeking greater clarity about entitlements, including what support should reasonably be expected within mainstream settings and how funding is being used to deliver this. Parent carers emphasise that accountability must go beyond reporting spend, and instead focus on whether funding is resulting in improved outcomes and meaningful support in practice.

WSPCF position: Settings should be held accountable through:

- Clear and transparent reporting on how funding is used and what provision is in place
- Consistent expectations of what Inclusive Mainstream funding should deliver, so families understand entitlements
- Monitoring of outcomes for children and young people, not just financial or process measures
- Mechanisms for families to raise concerns and challenge where support is not delivered
- Alignment between funding, provision and impact, so that investment can be clearly linked to improvements in children's experiences and progress

In summary, accountability should focus on whether children's needs are being met in practice, with transparency for families and a clear link between funding, provision and outcomes.

Question 31

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

Parent carers consistently report that early support within mainstream settings is often insufficient, inconsistent, and delayed, with many families needing to repeatedly request or escalate in order to secure support. There is strong agreement in principle that increasing funding within mainstream settings could improve early intervention and reduce escalation of need.

However, WSPCF evidence shows significant concern about how funding is used in practice, with families reporting uncertainty about spend and limited visibility of impact. Nationally, investment in SEND has increased substantially, but this has not consistently translated into improved outcomes or consistent provision.

Parent carers emphasise that increased funding must lead to tangible, visible support for children and young people, rather than being absorbed into general budgets.

Parent carers are clear that if additional funding is placed within mainstream budgets, it must be strongly ring-fenced with clear expectations for how it is used. The proposed Inclusive Mainstream Fund is intended to support early intervention and inclusive practice, but its effectiveness will depend on how transparently and consistently it is applied. Without clear parameters, there is a risk that:

- Funding is not used directly for SEND support
- Provision continues to vary significantly between settings
- Families remain unclear about what support should be available

At the same time, parent carers recognise the need for some local flexibility, so that funding can be used in ways that reflect the needs of children within a particular setting. This requires a balance between clear expectations and accountability, and flexibility to respond to individual need.

WSPCF supports increased SEND funding within mainstream settings in principle, but only where it is underpinned by strong safeguards. This includes:

- Clear ring-fencing of funding, with defined purposes linked to early intervention and inclusion
- Transparency for families about how funding is allocated and what provision it should deliver
- Accountability based on outcomes, ensuring funding results in meaningful improvements in support
- Access to training and specialist input, so staff are equipped to deliver effective provision
- Consistency across settings, reducing variation in support

Increased investment in mainstream settings has the potential to improve early support, but only if funding is clearly directed, transparently used, and demonstrably linked to improved outcomes for children and young people.

Question 32

In relation to pooled funding, we propose that every school becomes part of a local SEND group. Do you agree that this proposal aligns with our aim for all schools to be part of high-quality, community-based trusts?

Parent carers do not typically describe system structures in technical terms, but consistently report on the outcomes of how systems function in practice. They describe fragmentation between schools and services

and inconsistent experiences across settings. They also emphasise the importance of consistency, collaboration and shared responsibility, and can recognise the potential benefits of schools working together at a local level. A model where schools form part of a local SEND group may support:

- Better coordination across an area
- Shared responsibility for meeting need
- More consistent access to support

However, WSPCF evidence shows that families are cautious about structural reform where it is not clear how this will translate into improved day-to-day experiences. Parent carers consistently highlight that:

- Variation in school culture and willingness to include remains a key issue
- Collaboration alone does not guarantee consistent or high-quality provision

There is a strong view that the effectiveness of local SEND groups will depend not on their structure, but on how they are governed, resourced and held accountable. Parent carers raise important questions about how these groups will operate in practice, including:

- Where accountability sits and how decisions made at group level translate into consistent delivery within individual schools
- What oversight and escalation routes exist if provision is not delivered or concerns arise
- How families are involved in governance and decision-making including the role of Parent Carer Forums

There is a clear expectation that any new structure must include:

- Transparent governance arrangements
- Clear leadership and responsibility
- Defined routes for escalation and challenge
- Meaningful and ongoing involvement of parent carer voice, not consultation after decisions are made

While the principle of schools working collaboratively within local SEND groups is supported, this must be underpinned by:

- Clear and transparent accountability arrangements, including where responsibility sits at group and school level
- Consistent expectations across all settings, to reduce variation in provision
- Strong governance and leadership, with clarity about roles, decision-making and oversight
- Defined escalation routes for families, where concerns cannot be resolved at setting level
- Meaningful involvement of Parent Carer Forums and families in design, implementation and review

Collaborative structures have the potential to improve consistency and shared responsibility, but will only be effective if supported by clear accountability, strong governance and genuine partnership with families.

Question 33

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

Parent carers consistently report that when systems disagree, the impact is felt directly by children and families. They describe delays in support while decisions are made, uncertainty about who holds responsibility and being passed between services. They highlight a lack of accountability when support is not delivered.

WSPCF evidence shows that unresolved disagreements frequently result in:

- Children not receiving timely support
- Increased stress and escalation for families

Parent carers are clear that disagreement resolution processes must be:

- Timely, so children do not experience delays in support
- Transparent carer, so families understand what is happening and why
- Accountable, with clear responsibility for decisions and delivery

Critically, support for the child or young person must not be delayed while disputes are ongoing. Families also emphasise the importance of having clear and accessible escalation routes where disagreements cannot be resolved locally. There is a strong expectation that:

- Resolution processes must include independent oversight, not solely sit within the same system making the decision
- Outcomes must be binding and enforceable, with clear consequences where agreed provision is not delivered

Parent carers raise questions about how this will operate in practice, including:

- Whether escalation will sit within local SEND groups, local authorities, or at a national level
- How independent routes such as the ombudsman or other review bodies will be used
- What mechanisms will ensure decisions are implemented consistently

The current SEND Tribunal system remains a critical safeguard for families, enabling them to challenge decisions about assessments, provision and placement. While the government has stated that tribunals will not be abolished, there is evidence of proposed changes that may reduce their powers, including limiting their ability to name a school directly in an EHCP. There has also been wider concern that reforms may reduce reliance on tribunals or shift dispute resolution toward less formal mechanisms. Parent carers consistently report that tribunals are often the only route through which decisions are enforced in line with children's needs, with most decisions finding in favour of families.

There is therefore significant concern that any reduction in access to independent, legally enforceable routes of redress would weaken accountability across the system.

WSPCF position: Disagreements must be resolved through a system that:

- Ensures rapid resolution, so children do not face delays in receiving support
- Clearly defines responsibility at each level, including school, group, local authority and beyond
- Provides transparent processes, so families understand how decisions are made
- Includes clear, accessible escalation routes, including independent oversight
- Maintains strong, enforceable rights of challenge, including access to tribunal-level protection
- Ensures decisions are binding and acted upon, with accountability where this does not happen

Disagreement resolution must move beyond process to enforceability: families need confidence that decisions will not only be made, but delivered, and that robust, independent routes remain available when the system does not act in the best interests of their child.

Question 34

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

Parents consistently report that partnership working is effective only when it leads to real improvements for children and families, not just activity or meetings.

Families describe ongoing challenges with fragmentation, poor coordination and unclear accountability. While there is recognition that local partnership groups could improve collaboration, there is concern that without clear purpose and authority, they may become another layer in an already complex system.

Parents emphasise that effectiveness depends on:

- Clear responsibility for decisions and delivery
- Strong governance and accountability, including escalation routes
- A focus on measurable outcomes, such as reduced delays and improved consistency

They also stress that parent carer participation must be embedded, with lived experience shaping decisions and ongoing improvement.

WSPCF position: Local partnership groups will only be effective if they have clear purpose, strong accountability and are judged on outcomes for children and families, with meaningful involvement of parent carers throughout.

Question 35

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

Parent carers consistently report that effective partnership working is experienced through outcomes rather than structures. Families continue to describe challenges with fragmentation between services and a lack of coordination across education, health and care. From their perspective, effective partnership working should lead to reduced delays, improved communication, and clearer, more consistent pathways.

While parent carers recognise that local partnership groups have the potential to improve coordination and shared responsibility, experience shows that the existence of partnership structures alone does not guarantee meaningful change. WSPCF evidence highlights significant variation in how partnership groups operate across areas, including differences in leadership, governance and their ability to influence practice across services. Where partnerships are not effective, families continue to experience delay, inconsistency and a lack of accountability.

A consistent theme from parent carers is the need for much greater clarity about how these groups operate in practice. This includes understanding their role and remit, where accountability sits, and how decisions made at partnership level translate into consistent delivery for children and young people. There is also a strong expectation that partnership groups should be supported by robust governance arrangements, including clear leadership and defined responsibilities. Consideration should be given to independent oversight or leadership to ensure appropriate challenge and objectivity, alongside clear links to wider systems of accountability and inspection.

Parent carers are also clear that effectiveness must be measured in terms of real outcomes rather than activity. This includes whether:

- children receive timely and appropriate support
- systems are easier for families to navigate
- variation between settings is reduced

Ongoing feedback from families and children and young people must form a central part of this evaluation, rather than being treated as a one-off exercise.

WSPCF evidence further highlights the importance of embedding meaningful parent carer participation as a core part of partnership working. Families consistently report that their involvement must go beyond consultation and instead form part of ongoing decision-making and system design, with a clear and recognised role for Parent Carer Forums in shaping, reviewing and holding systems to account.

WSPCF position: To ensure effective use of local partnership groups, there must be:

- clear governance and accountability, including defined roles and escalation routes
- consistent expectations across areas, reducing variation in how groups operate
- measurable outcomes focused on children and families, not process
- embedded parent carer participation and strong feedback loops

In summary, partnership groups have the potential to improve coordination and outcomes, but this will only be realised where there is clear accountability, consistent governance and a strong focus on measurable impact for children, young people and their families.

Question 36

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

Parent carers consistently report that trust in systems is shaped by experience over time. Families describe repeated engagement without visible change and express frustration at having to retell their experiences without seeing meaningful action in response.

Parent carers are clear that collaboration requires more than consultation. WSPCF evidence shows that families value ongoing engagement, transparent communication and, critically, visible action. Parent carers report experiences such as “being asked for input but not seeing change”

This reflects a wider concern that current approaches to engagement are often too late in the process, with families asked to comment on plans that have already been developed, rather than being involved in shaping them from the outset.

Experience from local SEND reform activity highlights this challenge. Parent carers and Parent Carer Forums have not always been meaningfully involved in the co-design and development of strategic plans, resulting in missed opportunities to embed lived experience from the beginning.

Families are clear that stronger collaboration will only be achieved where:

- engagement happens early and continuously, not as a one-off or final-stage exercise
- lived experience is used as core system intelligence, rather than supplementary feedback

- families can see how their input has directly influenced decisions and outcomes

Parent carers emphasise that a culture of improvement depends on trust, accountability and transparency. This requires a shift from gathering feedback to demonstrating clear action and learning.

Families want to understand:

- what has changed because of their input
- how decisions have been made
- how systems are monitoring and improving over time

Without this, engagement risks becoming repetitive, and confidence in the system continues to diminish.

WSPCF position: - Strong collaboration and a culture of improvement require:

- Early and ongoing co-production with families, embedded from the start of strategic planning processes
- Transparent communication, including clear feedback on how parent carer input has informed decisions
- Recognition of lived experience as essential evidence, alongside professional expertise
- Clear accountability for delivering change, with visible outcomes for children and families
- Continuous engagement and feedback loops, ensuring plans remain responsive and improve over time

A culture of improvement cannot be achieved through consultation alone; it requires genuine co-production from the outset, with clear accountability for how family voice shapes decisions and delivers meaningful change.

Question 37

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

Parent carers consistently report that accessing information, advice and guidance is difficult and often overwhelming. Families describe information as fragmented, hard to navigate and frequently presented in technical language that is difficult to understand. Parent carers highlight that having information available is different from being able to use it.

WSPCF evidence shows that, in practice, many families rely on other parent carers and informal networks to understand how the system works and what support may be available. This reflects a gap between formal information provided and the practical, usable guidance families need.

Families also report challenges where they lack the time, confidence or resources to navigate complex systems, meaning that access to support is not always equitable. They are clear that improving fairness across the system requires more than simply providing more information. They also need trusted, accessible support to interpret information, understand their rights and navigate decisions.

WSPCF evidence highlights the critical role of SEND Information, Advice and Support Services (SENDIAS) in providing impartial guidance. However, these services are widely experienced as under-resourced and not always able to meet demand consistently.

At the same time, Parent Carer Forums (PCFs) play a vital role in:

- Translating complex systems into practical understanding
- Sharing lived experience and peer insight
- Representing parent carers through sharing their views with services
- Supporting families to build confidence and engage with services

These roles are complementary. SENDIAS provides formal, impartial advice, while PCFs offer lived experience and system insight and collects voice, acting as a key feedback mechanism between families and services.

Parent carers also emphasise that fairness is improved where information and guidance systems are not one-directional. There must be strong feedback loops, where:

- family experience informs how information is developed and delivered
- gaps and barriers are identified and addressed over time
- systems learn and adapt based on lived experience

Partnership working between SENDIAS, PCFs and local systems is therefore essential to ensuring guidance is not only available, but relevant, accessible and effective.

WSPCF position:

- Information, advice and guidance must:
- Be clear, accessible and easy to understand, avoiding unnecessary complexity
- Be available at the point of need, not only at key transition stages
- Explain both rights and processes, supporting informed decision-making
- Be supported by independent, impartial guidance, including adequately resourced SENDIAS services
- Recognise and embed the role of Parent Carer Forums as a trusted source of lived experience and system insight
- Include strong feedback loops, ensuring continuous improvement based on family experience
- Not rely on parent carer capacity alone to navigate systems, if fairness is to be achieved

Greater fairness will only be achieved where information is not only available, but usable, supported and informed by lived experience, with SENDIAS and parent carer-led PCF support working in partnership to enable families to navigate the system confidently.

Question 38

Do you agree that a SEND specialist (e.g. a SENCO) should sit on the school complaint panel, when the complaint relates to SEND support and provision? Please explain why.

Parent carers consistently report that complaints processes are often only reached after significant breakdowns in communication and trust. Families describe experiences that can feel adversarial, with issues escalating over time before resolution is attempted. There is a strong preference for concerns to be addressed early and collaboratively, rather than progressing to formal complaint stages.

WSPCF evidence shows that difficulties in communication and a lack of clarity about provision often underpin complaints. As a result, parent carers emphasise the importance of ensuring that any complaint relating to SEND is considered by individuals with a clear understanding of SEND needs, provision and responsibilities.

In this context, WSPCF agrees that including a SEND specialist, such as a SENCO, on complaint panels where concerns relate to SEND support could strengthen decision-making. A SEND specialist can provide informed insight into the child's needs, the provision in place, and whether that provision is appropriate and deliverable in practice. This has the potential to improve the quality and fairness of decisions, and to ensure that complaints are considered in a way that accurately reflects the complexity of SEND.

However, parent carers are also clear that strengthening complaint panels should not be seen as the primary solution. The focus must remain on preventing issues from escalating to complaints in the first place. This requires earlier, more transparent communication with families, clearer understanding of roles and responsibilities, and confidence that provision will be delivered as agreed.

Ultimately, parent carers want a system where concerns are heard, understood and acted upon early, reducing the need for formal complaint processes. Strengthening panels through SEND expertise is therefore a positive step, but it must sit alongside a wider focus on early resolution, accountability and trust-building across the system.

Question 39

This consultation outlines a series of measures intended to reform the SEND system. Some of these measures have already been finalised, and this is clearly indicated within the document. With this in mind, is there anything further you would like to contribute to help inform the remaining proposals that are still under consideration?

Across all WSPCF engagement, families consistently express deep concern about uncertainty, lack of clarity, and a growing disconnect between system reform and current lived experience.

Parent carers describe a system where:

- Children and young people are struggling now, not in the future
- Support is often delayed, inconsistent or not delivered at all
- Families are required to navigate complex systems with limited guidance and support

Families report children:

- Out of education or on reduced timetables
- Waiting extended periods for assessment or support
- Experiencing worsening mental health and wellbeing due to unmet need

A consistent message from parent carers is captured in the question “what happens now for children currently struggling?” While families recognise the intention behind long-term reform, there is significant concern that:

- The focus on structural change risks overlooking urgent current pressures
- Children and young people already within the system may not benefit from reforms for several years
- The gap between need and provision may continue, or widen, during transition

Parent carers are clear that reform must not be experienced as improvement in the future, but deterioration in the present.

Families consistently report a lack of clarity about:

- What changes are being proposed
- How and when they will take effect
- What protections and support children will have during and after transition

This uncertainty is contributing to a broader loss of trust and confidence in the system, particularly where families already feel that support is difficult to access and enforce.

Parent carers emphasise that clear, honest and transparent communication is essential, not only about the intended benefits of reform, but also about:

- What will change in practice
- What will remain the same
- How children's rights and support will be protected throughout

WSPCF evidence consistently demonstrates that many of the challenges identified through parent carer feedback are well known and long-standing, including:

- Delays in access to support
- Inconsistent provision
- Lack of accountability when support is not delivered
- Fragmentation across services

Parent carers are clear that reform must not only redesign systems, but must address these underlying issues directly. There is a strong expectation that lived experience should be treated as essential system intelligence, shaping both current improvements and future reform.

WSPCF position: to inform the remaining proposals, it is essential that SEND reform:

- Addresses current system pressures alongside long-term change, ensuring that children currently struggling receive timely support
- Provides clear, transparent communication for families, including how reforms will impact them in practice
- Maintains and strengthens trust, through visible action and consistent delivery
- Ensures strong accountability and enforceability, so that support is not only planned but delivered
- Embeds lived experience and co-production throughout, from design to implementation and review

Families are not asking for transformation at some point in the future, they are asking for a system that works for their children now. Reform will only be successful if it delivers both immediate improvement and sustained change, grounded in the lived experience of children, young people and their families.