

Response ID ANON-K22C-Q85M-W

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

1 What is your name?

Name:
Carol Foyle

2 What is your email address?

Email address:
admin@brentpcf.org

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

Yes

About You

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

Organisation

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

Not applicable – Responding as an organisation

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

Organisation – Other (please specify)

If 'other,' please specify your organisation type::
parent carer forum

7 What is the name of your organisation?

Please respond below::

Brent Parent Carer Forum CIC

8 What is your role within the organisation?

Please respond below::

Director and Parent Participation Lead

About You

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

Please select one answer in each row - Name (if responding as an individual):
No

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

10 Would you like us to keep your responses confidential?

No

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

Executive Summary

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

Please comment below::

All of our feedback is based on what parents have told us., . but to meet the word count we have pulled together themes It is essential to ensure that children, young people with SEND and their families are genuinely involved in the decisions that affect their lives. This means creating avenues for meaningful participation, rather than token gestures. Genuine involvement can be achieved by actively seeking their opinions, listening to their perspectives, and incorporating their feedback into policies and practices. By doing so, we foster a sense of ownership and empowerment among children and their families, ensuring that their voices are central to the decision-making process. Many of our members feel that much of the proposals are not representative of views or lived experiences. Whatever is decided on as the final proposals seeking the ongoing views of young people and their active engagement in primming the plans is key .

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

Please respond below::

As parents of children and young people with special educational needs and disabilities (SEND), we often find ourselves navigating a system that can feel confusing, inconsistent, and at times overwhelming. What we want, at the most basic level, is reassurance: reassurance that the decisions being made about our children's support are grounded in something solid. We want to know that professionals are drawing on high-quality evidence, proven approaches, and real-world experience—not guesswork, convenience, or budget pressures. We want to feel confident that the support our children receive is not only well-intentioned but genuinely effective.

From a parent's viewpoint, evidence-informed decision-making is not an abstract concept. It is something deeply practical and personal. It affects whether our child can access learning, whether they feel safe and understood, whether they develop confidence, and whether they thrive socially, emotionally, and academically. Evidence matters because our children matter.

Part one: putting children and young people first

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

Please respond below::

From a parent's point of view, the Universal Offer should be the part of the system that feels simple, reliable, and genuinely accessible. Early intervention should be a must and it should be the foundation that every child stands on, regardless of their needs, background, or starting point. Yet too often, parents experience the Universal Offer as inconsistent, confusing, or dependent on luck — the luck of the school, the teacher, the GP, the health visitor, or the local authority team they happen to encounter want children to be best supported by the Universal Offer, we need to build a system that parents can trust. That means a system that is predictable, transparent, and responsive. It means a system that doesn't wait for crisis, doesn't rely on parents fighting, and doesn't assume that families already know how to navigate complex processes. It means a system that sees parents as partners, not problems.

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

Please respond below::

From the perspective of parents living in Brent, ensuring that children who are identified within the Targeted layer—as described in the white paper and to receive the most effective support is of utmost importance. Parents recognise the need for interventions that are tailored to fit the unique requirements of each child.

Tailored Interventions

Parents believe that providing tailored interventions can only be achieved by working closely with them and professionals—including teachers, support staff, and external agencies—this is viewed as crucial by parents. Working together ensures that support for the child is coordinated and consistent, rather than fragmented or duplicated.

Parents emphasise the importance of regular monitoring and review of each child's progress. This ongoing evaluation allows interventions to tweak and review. parents welcome making ISP a legal requirement but are very worried that some children will fall through the net and perhaps later down the line end up in crisis . We feel that these changes is moving away from meeting and seeing children as individuals and not expecting them to fit into a package ,

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

Please respond below::

A starting point in supporting children within targeted layer is accurate and timely identification of need. This involves careful assessment processes that consider a child's academic performance, social and emotional wellbeing, behaviour, attendance, and any external factors influencing their development. Assessment should not be a one-time activity, but rather an ongoing process informed by classroom observations, formative assessments, and input from families the yp and other professionals. By developing a detailed understanding of each child's strengths and areas for development, practitioners can ensure that support is appropriately tailored.

Once needs have been clearly identified, the next critical step is the implementation of tailored interventions. These interventions should be specifically designed to address the barriers identified during assessment, rather than applying generic solutions.

From the perspective of parents living in Brent, it is vital that children identified within the Targeted layer receive support that is both effective and sensitive to their unique circumstances. Parents value a collaborative approach that involves open communication between families and professionals, ensuring that interventions are not only evidence-based but also reflect a child's lived experience at home and in the community. This partnership helps foster trust and ensures that support strategies are meaningful, consistent, and adaptable to each child's evolving needs.

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

Please respond below::

Children within the Specialist layer represent those with the most complex and enduring needs, often requiring intensive, highly individualised, and multi-agency support. Ensuring that these children are effectively supported involves a holistic, coordinated, and responsive approach that places the child and their family at the centre of all planning and intervention. This level of support goes beyond targeted provision and requires specialist expertise, structured systems, and sustained collaboration across education, health, and social care services. We are really worried about seeing children as a condition and packages. It feels we are moving backwards. We need staff to be highly trained and able to communicate and support parents.

Part one: putting children and young people first

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

Please respond below::

Early years settings, schools, and colleges play a crucial role in promoting and safeguarding the mental health and wellbeing of children and young people. Providing a nurturing environment, these institutions can implement strategies and practices that address emotional needs, foster resilience, and ensure every child feels valued and supported.

Support needs to be provided in a systemic and holistic way and we need to be asked what we need.

We welcome the expert at hand Plan and have been involved in the development of what is needed.

Creating Supportive Environments

Educational settings can develop a positive atmosphere where children and young people feel safe, respected, and encouraged to express their emotions. By prioritising open communication and building trusting relationships, staff can identify and respond to mental health concerns promptly.

Promoting Wellbeing

Schools and colleges can integrate wellbeing activities into their daily routines, such as mindfulness sessions, physical exercise, and creative outlets. These initiatives help pupils manage stress, develop coping skills, and maintain a balanced lifestyle.

Early Working closely with families, healthcare professionals, and specialist services, educational settings can provide early intervention and tailored support for those experiencing difficulties. By recognising signs and offering appropriate guidance, they contribute to positive outcomes for all children and young people.

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

Please respond below::

Refreshed areas of development can help educators identify specific challenges that learners may face, such as difficulties with communication, social interaction, or emotional regulation. This allows teachers to better recognise individual needs rather than applying a one-size-fits-all approach. As a result, teaching can become more targeted and inclusive.

Secondly, the refreshed areas encourage a more holistic understanding of learners. By considering a range of factors that may affect participation—such as environmental, social, and cognitive influences—educators are more likely to adapt their teaching strategies and classroom environments to remove barriers. This can lead to improved engagement and confidence among learners.

Additionally, having updated and relevant guidance can support consistency across educational settings. When educators share a common framework for identifying and responding to needs, it promotes collaboration and more effective support planning, including working with families and other professionals.

However, the effectiveness of these areas will depend on how well they are implemented. Educators will need appropriate training, time, and resources to fully understand and apply the framework in practice. Without this support, the impact may be limited.

Overall, the refreshed 'areas of development' have strong potential to improve inclusive practice by helping educators better understand barriers and respond in a more informed and flexible way.

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

Please respond below::

From a Brent parent's perspective, effective joint working should start with clear and open communication between all parties. We feel that there is a real commitment to working together. Parents need to feel listened to and involved, with regular updates on their child's progress and opportunities to contribute their insights. Having a dedicated point of contact within each setting—such as a family support worker or SEND coordinator—would make it easier for parents to raise concerns and share information. Parents need to receive support with a curious mind and understanding of their background and lived experience.

Joint training sessions and workshops for parents, early years providers, Best Start Family Hubs, health professionals, and local authority and health staff could help build mutual understanding and trust. Flexible meetings, including virtual options and timings outside of working hours, would make participation more accessible for families. Ultimately, the aim should be a seamless support system where everyone works together to meet the unique needs of children with SEND, ensuring families never feel isolated or overwhelmed navigating the process.

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

Please respond below::

As parents of a child /ren with SEND living in Brent, we think the EYFS two-year-old progress check and the Healthy Child Programme development review could be improved by making them more joined up and family-centred. It would help if both checks were scheduled together where possible, so parents don't have to repeat the same information to different professionals. Professionals should always include parents in the conversation and really listen to our observations about our child's strengths and challenges. If there are any concerns, clear next steps and support should be explained straight away, with follow-up dates agreed so families aren't left waiting or worrying. Having a single point of contact, such as a keyworker, who guides families through the process and connects them with services would make a huge difference. Finally, feedback from parents who have been through the process in Brent should be used to make ongoing improvements, ensuring our voices are heard and acted upon. we feel some of the developments in Brent around expert at hand and Needs profiling is taking on board the need work together .

Part one: putting children and young people first

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

Please respond below::

We feel that having National Inclusion Standards is a good idea and we hope they will foster an inclusive environment by identifying the most crucial areas for gathering and disseminating evidence. along with ways of working.we hope these will link with the new Ofsted framework priorities is essential for ensuring that efforts are focused where they can have the greatest impact.

Top Three Priority Areas

1. Establishing Clear and Measurable Standards

Developing evidence-based standards is fundamental to guiding organisations in their inclusion efforts. The focus should be on defining what inclusion looks like and how it can be measured, ensuring consistency across different settings.

2. Monitoring and Evaluating Progress

Collecting evidence on the implementation and effectiveness of inclusion practices allows for ongoing assessment. This helps identify what is working and where improvements are needed, supporting continuous development.

3. Sharing Best Practice and Learning

Disseminating evidence and examples of successful inclusion strategies enables organisations to learn from one another. Highlighting effective approaches encourages wider adoption and supports collective progress towards inclusive standards.

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

Please respond below::

we feel that identifying the most important issues for national training is essential in providing effective support for children and young people with special educational needs and disabilities (SEND). The following points highlight the critical areas that should be addressed in such training programmes.

Critical Issues for National Training

- Ensuring that all training addresses the diverse range of needs experienced by children and young people with SEND, recognising the individuality of each learner.
- Developing staff awareness and understanding of the different types of SEND, including how these needs may present in educational settings.
- Providing practical strategies and approaches that educators can implement to support pupils with SEND in the classroom and beyond.
- Emphasising the importance of early identification and intervention, enabling prompt and effective support for those who require it.
- Encouraging a collaborative approach, involving teachers, support staff, families, and other professionals in planning and delivering support for SEND pupils.
- Fostering an inclusive ethos, promoting positive attitudes towards SEND and ensuring all children and young people are valued and included .

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

Please respond below::

You can't reduce workload by increasing responsibility and then without adequately increasing resource. Sencos told that they many will leave if the pressure is added, training is needed but without back fill where they are already being asked to identify needs, plan provision and coordinate services, support increasingly complex pupils, handle concerns from worried parents Adding more expectations without proper support will not ease pressure but will only increase it.

If workload is to be managed, we need realistic expectations,proper staffing and access to specialist support. Otherwise, we risk asking schools to carry more, without giving them what they need to do it.

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

Please respond below::

Similarly the Q14 answer raises the same reply. The SENCO role is already critical. The risk is that we keep adding to it without properly supporting it.

SENCOs are expected to do so much already. They are being expected to identify needs, coordinate provision, liaise with services, support staff and manage increasingly complex cases. This is often alongside other responsibilities.

If the role is to evolve, it must be properly resourced and protected in terms of time, Otherwise, we are simply asking more of a role that is already under significant pressure.

SENCO plays a vital role in supporting children and young people with SEND)

To ensure that every child with SEND receives the support they deserve, the SENCO role should evolve to be more responsive and proactive. SENCOs

need to have a clear understanding of each child's unique needs and work closely with families to develop tailored support plans. Collaboration between SENCOs, teachers, and parents is essential for creating an inclusive environment where children feel valued and understood. Continuous professional development and training are crucial for SENCOs to stay updated on best practices and emerging strategies in SEND education. Their role should be centred around partnership and empathy. By actively listening to the concerns of parents and children, SENCOs can build trust and help create a supportive school community.

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

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

Please respond below::

we would like to ensure that parents and children are actively involved in co-producing the ISP.
Record their input explicitly (e.g., "what matters to me", preferences, aspirations).
Provide opportunities for families to review and approve the plan. Focus on Outcomes, Not Just Activities
Clearly define measurable, meaningful outcomes (e.g., independence, wellbeing).
Link every support activity to a specific goal or outcome.
Include progress measures to track whether the plan is working.
Personal details and communication needs
Health and medication requirements
Risks and safeguarding considerations
Daily routines and preferences
Social, cultural, and community engagement
Emergency and contingency plans
Set scheduled review dates (e.g., every 3–6 months or after significant changes).
Incorporate feedback loops from staff, the individual, and families.
Track changes and ensure version control is maintained.
Introduce internal audits or peer reviews of ISPs.
Use a scoring or rating system to assess quality and completeness.
Ensure managers or supervisors formally sign off each ISP.
Provide training on:
Person-centred planning
Writing clear, outcome-focused ISPs
Legal and safeguarding requirements
Offer examples of high-quality ISPs as guidance
Accessibility and Clarity
Write ISPs in plain, jargon-free language.
Provide easy-read or visual formats where needed.
Ensure the individual can understand and use their own plan.

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

Please respond below::

To ensure Individual Support Plans (ISPs) are effective in day-to-day practice, they must be easy to understand, quick to navigate, and directly actionable for staff.

ISPs should be written in clear, jargon-free language that can be easily understood by all professionals, including new or temporary staff. Sentences should be short and focused, avoiding unnecessary detail or repetition.*

A well-organised layout helps staff quickly locate key information. Use:

- * Clear headings and subheadings
- * Bullet points instead of long paragraphs
- * Logical flow (e.g., "About Me" → "Daily Support" → "Risks" → "Actions")

This improves usability, especially in time-sensitive situations.

Include only information that is relevant to providing care and support. Each section should answer:

* *What needs to be done?*

* *How should it be done?*

* *Why is it important for this individual?*

* Instead of: "Prefers quiet environments"

* Write: "Support in low-noise settings; avoid crowded areas where possible"

Use visual cues (e.g., bold text, icons, or call-out boxes) to emphasise:

* Risks and safety considerations

* Communication needs

* Key triggers and support strategies

ISPs should be as detailed as necessary but as brief as possible. Remove duplicated or outdated information and avoid overly long documents that are difficult to use in practice.:

* Is easy to follow

* Reflects real-world practice

* Supports consistent care delivery

17 How can we best support transition for young people with SEND, so that they are well supported into post-16 provision and further education, training or employment?

Please respond below::

As parents we feel that that there is not enough undertaken in this area . It would be incredibly helpful if SENCOs were more visible and accessible, taking the time to understand our YP individual needs and strengths,s. Regular communication and genuine collaboration would make a world of difference, ensuring we feel truly listened to and supported throughout our child's educational journey.

By working closely with local services and acting as a bridge between school, families, and external support, SENCOs can ensure that young people with SEND in Brent receive the tailored help they need to thrive, both now and as they move on to their next steps after school.

- Provide tailored support during the transition process to address individual needs.
- Facilitate collaboration between education providers, families, and external agencies to ensure continuity of care and guidance.
- Offer clear information and guidance about the options available after the age of 16, including further education, training, and employment pathways.
- Promote early planning and preparation, allowing young people with SEND to make informed choices and feel confident about their next steps.
- Ensure ongoing monitoring and support as they move into new settings, helping them to settle and succeed.

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

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

Please respond below::

The challenge of ensuring that every area is able to address the comprehensive needs of children and young people is a significant one. A key strategy for achieving this goal is the effective utilisation of Inclusion Bases.

The Role of Inclusion Bases

Inclusion Bases should be designed to support children and young people by providing targeted resources and interventions. It is essential that these bases are accessible in every area to ensure that no young person is left without the support they require.

Meeting the Full Range of Needs

To guarantee that all areas can meet the full spectrum of needs, Inclusion Bases must be equipped to offer flexible, responsive support. This involves ongoing assessment and adaptation to the changing requirements of children and young people within each locality.

Conclusion

By prioritising the establishment and development of Inclusion Bases in every area, we can work towards ensuring that all children and young people have their needs met, promoting equality and opportunity for all. we dont want them to be rooms to exclude children too.

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

Please respond below::

As parents in Brent, we believe it is vital that Inclusion Bases are accessible and responsive to the diverse needs of children and young people. There should be clear communication between schools, families, and support services to ensure every child receives personalised support tailored to their unique circumstances. By fostering strong partnerships and encouraging regular feedback from parents, we can help create an environment where all children thrive and feel valued.

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

Please respond below::

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 effectTo ensure that every area can meet the full range of needs for children and young people, Inclusion Bases must be established and supported effectively. This involves creating a system where mainstream settings are able to access prompt, specialist support tailored to the individual requirements of children and young people.

Experts at Hand Offer

Through the Experts at Hand offer, the aim is to guarantee that mainstream environments have swift access to specialist expertise. This support enables schools and other settings to better address the diverse needs of their pupils, ensuring no child or young person is left without the help they require.

Arrangements Between Local Area Partners

For the Experts at Hand offer to be delivered successfully, robust arrangements must be established between local area partners, including education, health, and social care sectors. These partnerships are essential for providing coordinated, timely, and specialist support directly where it is needed. In Brent will have co-produced our plan which all links into our strategic plan so all documents will work together .

Part three: specialist support for those with complex needs

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

Please respond below::

- Clear Pathways for Identification and Referral: Robust systems should be in place to identify children and young people with low incidence and highly complex needs at the earliest possible stage. Efficient referral processes ensure timely access to assessments and appropriate placements.
- Availability of Suitable Specialist Placements: There must be a sufficient range and capacity of specialist settings to meet the diverse and complex needs of these individuals, ensuring that no child is left without a suitable educational environment.
- Multi-Agency Collaboration: Effective partnerships between education, health, and social services are critical. This joint working ensures comprehensive planning and support for each child or young person.
- Consistent and Transparent Funding Arrangements: Adequate funding streams must be in place, with clear and consistent processes to support placements, resources, and specialist staff as required.
- Ongoing Professional Development: Staff working within specialist placements should have access to regular training and development opportunities, ensuring the highest standards of care and support.
- Family and Child Centred Approaches: The views and experiences of children, young people, and their families must be central to placement decisions and ongoing support.
- Regular Review and Monitoring: Robust mechanisms for ongoing review and monitoring of placements are essential to ensure they continue to meet the

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

Please respond below::

Specialist Provision Packages must be carefully developed to ensure they effectively address the main types of need currently recognised within our system. This involves tailoring support strategies so that each package directly responds to specific requirements, thereby promoting positive outcomes for individuals.

To achieve this, it is essential to:

- Identify the primary categories of need that require specialist provision.
- Design packages that offer targeted interventions aligned with these needs.
- Ensure flexibility within packages to accommodate individual differences whilst maintaining a consistent approach across recognised needs.
- Regularly review and refine these packages to ensure ongoing effectiveness and relevance.

By focusing on these core principles, Specialist Provision Packages can be structured to provide meaningful and sustainable support for all recognised types of need.

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

Please respond below::

Supporting Recognised Needs Through Structured Approaches

Designing Specialist Provision Packages for Recognised Needs

Specialist Provision Packages must be carefully developed to ensure they effectively address the main types of need currently recognised within our system. This involves tailoring support strategies so that each package directly responds to specific requirements, thereby promoting positive outcomes for individuals.

To achieve this, it is essential to follow a structured approach:

- Identify the primary categories of need that require specialist provision. This ensures that packages are focused and relevant to the specific challenges faced by individuals within each category.
- Design packages that offer targeted interventions aligned with these needs. By providing interventions that are directly related to each recognised need, the support becomes more effective and meaningful.
- Ensure flexibility within packages to accommodate individual differences whilst maintaining a consistent approach across recognised needs. Flexibility allows the provision to be personalised, whilst consistency ensures equitable support across the system.
- Regularly review and refine these packages to ensure ongoing effectiveness and relevance. Continuous evaluation helps maintain the quality and impact of the support offered, adapting to changing needs as necessary.

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

Please respond below::

We feel this is a good idea and feeds into the work we are undertaking together to establish a more streamlined and direct route for all children, where those under the age of five with complex needs to access Specialist Provision Packages and Education, Health and Care Plan (EHCP) assessments. This we hope will reduce the barriers currently faced by families and professionals, ensuring that support is provided at the earliest possible stage.

Ensuring Effective Implementation

To guarantee that this new approach is successful in practice, it is essential to identify the necessary steps and safeguards. Consideration must be given to how the pathway will be managed, monitored, and evaluated. Stakeholders should be engaged throughout the process to ensure that the system is responsive to the needs of young children and their families. Clear guidelines and transparency in decision-making will help maintain consistency and fairness.

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

Please respond below::

Key Elements of Needs Assessment

When conducting a needs assessment, it is expected that several core components will be considered. These typically include the collection of relevant evidence as well as obtaining input from experts or professionals. Such an approach ensures that the assessment is thorough, balanced, and informed by

appropriate knowledge and experience.

Evidence

Evidence forms the foundation of any effective needs assessment. This may encompass quantitative data, qualitative feedback, case studies, and other substantiated information that accurately reflects the situation or context under review.

Expert or Professional Input

Involving experts or professionals adds further depth to the needs assessment process. Their specialised knowledge and experience can provide valuable insights, identify gaps, and help interpret the evidence in a meaningful way, supporting sound decision-making.

Part three: specialist support for those with complex needs

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

Please respond below::

There are several factors that should be taken into account. The aim is to ensure that the proposed settings are suitable and meet the individual needs of the child or young person.

Key Factors to Consider

- Suitability of Provision: The LA should evaluate whether each setting is capable of providing appropriate support and resources to address the specific educational, health and care needs detailed in the plan.
- Parental and Young Person Preferences: The wishes of parents and the young person themselves should be given careful consideration, ensuring that their views are reflected as far as possible in the options presented.
- Accessibility and Location: The proximity of the setting to the child or young person's home, as well as transport arrangements, should be considered to minimise disruption and ensure attendance is feasible.
- Capacity and Availability: The LA must check that the proposed settings have the space and resources to accommodate the child or young person, avoiding over-subscription issues.
- Legal Requirements: Any statutory obligations or relevant legislation regarding the naming of educational settings must be observed throughout the process.

By taking these factors into account, local authorities can provide parents and young people with a meaningful and appropriate choice of settings, supporting the best possible outcomes for those with special educational needs.

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

Please respond below::

For parents are to make meaningful decisions about where their child should be educated, the starting point has to be honesty.

Not vague description not flowery words . But a clear and accurate picture of what a setting can actually deliver in practice. Parents need clear, accessible information about the nature of provision in each setting, including the type of support available, staffing, and how needs are met in practice. They should also be supported through the decision making process with independent advice and opportunities to visit settings and understand how provision operates day to day.

Parents need to understand the reality on the ground. That means knowing things like class sizes, the level of specialist expertise available, the nature and frequency of therapeutic input, and whether that support is genuinely embedded within the setting or simply accessed externally when needed. They need to understand the peer group their child will be placed within, the environment they will be expected to function in, and whether it is one in which their child can realistically cope and make progress. Because without that level of transparency, parents are not really choosing at all. They risk otherwise making decisions based on partial information, and that is not a fair or reliable basis upon which to make choices that will shape a child's future. reality on the ground.

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

Please respond below::

As for Alternative Provision, we do not think there should be a rigid maximum length of time at all. The idea of imposing a fixed timeframe risks missing the point entirely.

Alternative Provision serves different purposes for different children. For some, it may be a short term intervention designed to support a transition back into mainstream education. For others, it may be the most appropriate placement for a longer period, depending on their needs and circumstances.

What matters is not how long a child remains in Alternative Provision, but whether that placement continues to be appropriate.

That requires ongoing review, proper oversight, and a clear understanding of whether the child is progressing, being supported, and in the right setting.

If you impose an arbitrary time limit, you run the risk of moving children on simply because time has expired, rather than because it is right for them. Equally, without meaningful review, there is a risk that children remain in placements that are no longer working, with no effective mechanism to bring about change.

So the focus should not be on how long a placement lasts. It should be on whether it is appropriate, and whether there is a system in place to assess that properly and act on it when necessary

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

Please respond below::

when public money is being used, there should be clear duties, proper oversight, and transparency.

Aligning expectations around admissions, standards, and accountability with those that apply in the maintained sector is, in principle, a sensible step. Public funding must be capable of scrutiny, and provision funded by the state should be subject to enforceable legal obligations. Costs do need to be justified and where there is evidence of unreasonable charging or lack of transparency, that must be addressed.

Demand for specialist placements, particularly for children with complex and low incidence needs, significantly exceeds supply. Where that happens, families and local authorities are left with limited options. There is therefore a real danger that, if the focus is placed too heavily on constraining cost without addressing sufficiency of provision, the result will not be better value, but reduced access. To my mind that, ultimately, risks placing children in settings that are available, rather than those that are appropriate.

Part four: reforming the system to reward inclusion

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

Please respond below::

Accountability has to be rooted in what actually matters, which is not simply how money is allocated, but what provision is delivered as a result of it. As parents we feel that there seems to be a more clearer move back to accountability is about money, not about the ethos. We need a joint clear understanding of what is important - values and principles what it looks like when it's working and what it looks like when it isn't.

At the moment, there is too often a disconnect between funding and delivery. Resources may be allocated in principle, but what families experience on the ground does not always reflect that. So if we are talking about accountability, it must focus on whether support is actually in place, whether it is sufficient, and whether it is making a difference.

Because one of the real concerns here is that accountability is too often confined to internal school processes, particularly complaints procedures which many parents already view as lacking independence.

Where complaints are handled by those within the system, or by governors who are themselves part of that structure, there is an understandable perception that outcomes are influenced by vested interests.

If accountability is to mean anything, there must be proper distance between the decision maker and the subject of the complaint. That is why independent oversight matters. It is why tribunals and impartial decision making is a necessity.

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

Please respond below::

As for placing more SEND funding directly into mainstream budgets, we have real concerns, we don't feel the setting / school system should take on the legal power. We feel schools are grossly underfunded. It's good to hear they will receive more training but what about backfill and staffing to undertake the interventions. On one level, it may appear sensible to give schools greater control over resources. But in practice, this risks bringing parents into direct conflict with schools in a way that is not helpful and, in some cases, actively damaging.

Where there is disagreement about what a child needs and what should be delivered, that dispute often sits, at least in part, with the local authority. If funding is fully devolved to schools, that distance is reduced or removed entirely. The school becomes both the provider of provision and, in effect, the gatekeeper of the resources needed to deliver it. If the current law is followed would there be a need for change? This is because it risks placing strain on the relationship between parents and schools.

Where the burden of resolving disputes shifts directly onto relationships that should be protected, we are most certainly not improving things.

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

Please respond below::

We believe this is a good idea and we are pleased that in Brent we will be working within 5 clusters with health/ social care and education but also to include areas such as housing. We wouldn't want it to become like an academy trust - we need high quality, high aspirations and a greater understanding of the local community and of the population, it takes a village to raise a child! Early intervention is key and collaboration is, of course, a positive thing in principle. Schools working together, sharing expertise, and coordinating provision should be encouraged. But the difficulty is not the idea of partnership. It is what happens when things go wrong. Pooling funding and grouping schools together may create efficiencies and may allow resources to be shared as well as decisions to be made at a collective level but it also introduces a very real risk that responsibility becomes diluted.

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

Please respond below::

When multiple schools are involved, and decisions are made within a group, it can become less clear who is actually responsible for ensuring that provision is delivered for a particular child and when that lack of clarity exists, accountability becomes harder to establish. The issue comes even more acute when disagreements arise. Internal resolution mechanisms, however well intentioned, are unlikely to command confidence where those making the decisions are also part of the system being challenged. How many people feel that their complaints are taken seriously or appropriately when they raise concerns with their local authority? Where decision makers have a vested interest in the outcome?

We think there must be independent routes of resolution. There must be a clear ability to escalate disputes beyond the group, to a body that is not directly involved in the decision making process. Without that, there is a real risk that disagreements are never properly resolved.

Part four: reforming the system to reward inclusion

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

Please respond below::

effectiveness cannot be measured simply by whether a structure exists or whether meetings take place. It must be judged by outcomes.

(a) Are children receiving the support they need?

(b) Is provision being delivered consistently?

(c) Are decisions being made based on need rather than resource constraints?

We feel very strongly that local partnership groups can be of real value, they must not simply coordinate provision but actually improve it. We are working with Brent in the 5 clusters and the development strong MDT where parents and their children are central. But to be successful there has to be clarity of responsibility, transparency in decision making and accountability when things do not work. So again, the principle is straightforward. Collaboration can support delivery. But it cannot replace accountability. Without clear lines of responsibility and independent oversight, the system risks becoming more joined up in form, but absolutely ineffective in practice.

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

Please respond below::

Before we speak about collaboration, partnership, and guidance. All of which are important. But again, they risk focusing on structure and process without fully addressing what ultimately determines whether the system works. Of course, the right stakeholders must be involved. That includes schools, health services, social care, and importantly, families themselves. Independent expertise also has a role to play. But involvement must be meaningful. There is little value in bringing stakeholders into a process if their input does not genuinely influence decision making. Too often, participation becomes symbolic rather than substantive. Views are gathered, but outcomes remain unchanged. If these groups are to succeed, stakeholders must not simply be present. They must have a real voice, and that voice must carry weight.

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

Please respond below::

We feel as a forum we have always been involved and invited to be a key partner. We feel Brent's plan links in our expert at hand and Brent's improvement plan.

Documents that set out aspirations, priorities, and commitments need to keep on top of all intended strategies and have clear accountability for delivery. Collaboration is important, but it cannot substitute for responsibility. A culture of improvement cannot be created simply by drafting a document. It requires clear expectations, consistent delivery, and the ability to identify and address failure when it occurs. We feel that we are part of a culture of improvement.

Fairness comes from something more fundamental. It comes from a system where needs are properly identified and where provision is clearly specified. Crucially it also comes from a position where provision can be enforced when it is not delivered. Without that, we risk creating a system that is easier to understand...but no easier to rely upon.

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

Please respond below::

We feel families need clear, accessible information to understand the system and navigate it. But we need to be honest about the limits of guidance. Guidance explains rights. It does not secure them.

We also feel families need someone to help them walk through the various journeys they need to tackle.

We do not struggle because information is unavailable, we struggle because, even where rights are clear, provision is not always delivered. Haven said this sometimes information could be made easier to find and understand. So while improving information and advice is helpful, it will not, on its own, ensure fairness across the system.

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

Please respond below::

On one level, having a SEND specialist involved in complaints about SEND provision may appear sensible. Expertise matters, and decisions should be informed by a proper understanding of the issues.

We do not agree that the SEND specialist should be a SENCO. It would be asking someone to make their own homework. SENCOs are already overworked and often have some many difficult situations to balance. What is key is independence. Because if the person sitting on that panel is part of the same system that is being challenged, or closely connected to it, then the concern remains the same. There is a lack of distance between the decision-maker and the subject of the complaint.

Parents will lack confidence in internal complaints processes. It is not necessarily because people lack knowledge. It is because they are not seen as independent. So while specialist input may assist understanding, it does not resolve the underlying issue. Complaints about SEND provision require not

just expertise, but impartiality.

Part four: reforming the system to reward inclusion

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

Please respond below::

The implication is that if we refine the structure, the system will improve. we strongly disagree with the move towards pre-determined or generic packages of provision. Children and young people with SEND are not uniform. Their needs are not interchangeable, and they do not fit neatly within predefined categories. Provision must be bespoke. It must be based on properly assessed need, identified through multidisciplinary input, and tailored to the individual child.

We do not need a more complex system. We need a system that works.

If reform does not secure those fundamentals, then there is a real risk that we create a system that appears more organised on paper, but does not improve outcomes for children.

else risks creating a system where children are expected to fit the provision, rather than provision being designed to meet the child. But even that is only part of the issue. Because identifying the right provision is only meaningful if it is actually delivered.

The central problem I see, repeatedly and consistently, is not the absence of frameworks. It is the failure to deliver what those frameworks already require. Needs are identified, but not met.

Provision is specified, but not put in place. Decisions are shaped by what is available, rather than what is required