

## Executive Summary

### Community Union's Official Response to the Government Consultation *SEND Reform: Putting Children and Young People First*

May 2026

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Community Union broadly welcomes the ambition of the Government's SEND reform proposals. If properly funded, staffed, and implemented these reforms could reduce conflict, improve outcomes, and build a more inclusive education system. However, there are significant risks that must be addressed before the reforms can succeed.

#### Family Voice and Evidence

Children with SEND, their parents, and carers must be genuinely involved in decisions at every level – from individual support planning to national policy design. Engagement must go beyond consultation on pre-drafted documents with families co-producing plans from the outset. Best practice should draw primarily on practical, setting-based evidence from English schools, with caution applied before importing models from other countries or jurisdictions whose funding and infrastructure differ significantly.

#### The Three-Tier Support Model

Community broadly supports the Universal, Targeted, and Targeted Plus structure, but raises important concerns at each level.

- **Universal provision** is wholly reliant upon inclusive teaching in every classroom, which is only achievable with adequate investment in teaching assistants, specialist teachers, and specialist professionals such as educational psychologists who are already in critically short supply. Without targeted capital investment in building infrastructure (sensory spaces, quiet rooms, flexible layouts) and clear ring-fenced funding, the Universal Offer risks being aspirational rather than operational.
- **Targeted Support** must be triggered early and resourced sufficiently. Delays in intervention produce worse outcomes and cost much more in the long-term. Digital Individual Support Plans (ISPs) are a genuinely positive development if designed to reduce workload and improve transparency, but Community warns that a statutory duty to *create* an ISP is not the same as a statutory duty to *deliver* it. Without enforceable accountability and independent redress, the Targeted tier risks becoming the place "where the system's commitments go to quietly disappear."
- **Targeted Plus** is not clearly enough defined and could be exploited in both directions: by settings managing children away from Education Health & Care Plan eligibility, and by families seeking more resource. The distinction between tiers must be specified in statutory guidance with sufficient precision to prevent Targeted Plus becoming a cost-management tool that defers legitimate EHCP assessment. Community is particularly concerned that ISPs at this level carry no legal enforcement equivalent to tribunal appeal, meaning families will continue to fight for EHCPs.

### **Specialist Provision**

EHCPs must be retained with their full statutory force until 2030, and any replacement framework must preserve the legal rights and independent tribunal route that families depend upon. The transition will place enormous pressure on educational psychologists and local authority staff who are simultaneously being asked to build the new system so the first operational priority must be to support this transition process.

Community is unequivocal that **special schools must be preserved and properly funded**. No inclusion base in a mainstream school can fully substitute for the therapeutic environments and specialist staffing these schools provide for children with the most complex needs. Outreach capacity must be *additional* to core special school funding, not extracted from it.

### **Workforce and Training**

The specialist workforce simply does not currently exist at the scale required. Training an educational psychologist takes six to seven years; a speech and language therapist three to four. The £40 million workforce development fund and the broader £200 million training programme are welcome first steps but insufficient on their own. Community calls for a costed ten-year specialist workforce plan covering educational psychologists, speech and language therapists, occupational therapists, and specialist teachers, with training embedded as ongoing annual CPD – not just a one-year programme. Training must be strategy-focused rather than condition-focused, to equip practitioners with adaptive teaching skills and approaches that work across the new Areas of Development framework regardless of diagnosis.

### **Early Years**

Early years settings already face potentially the most acute version of every challenge in the proposals – inadequate infrastructure, high staff turnover, thin financial margins, and limited specialist training – yet they are now being asked to carry substantial new identification and support responsibilities. PVI providers in particular are starting from a near-zero baseline. Community strongly supports Best Start in Life Hubs and the fast-track route to specialist assessment for under-fives, but notes that neither is yet universal across England. The dedicated SEND practitioner in every Hub could be an essential specialist, but they must have genuine authority to trigger support pathways, not merely advisory status.

### **Individual Support Plans and Accountability**

ISPs must contain a guaranteed minimum: a clear description of needs across the Areas of Development, named interventions with frequency and duration, measurable outcomes, named responsible professionals, and meaningful co-production with families. Reviews should ordinarily be annual with rights to request urgent review. The accountability system must measure delivery, not just planning since a well-written ISP that is never implemented provides false assurance and will erode trust.

## **Funding**

Throughout this response, Community returns consistently to one overriding concern: **funding sufficiency must be established before accountability expectations are set.** It is not reasonable to hold schools, early years settings, or local authorities accountable for delivering provision if the resources to do so have not been provided. Per-pupil inclusion funding rates must be benchmarked against the actual cost of delivering the Specialist Provision Packages and updated annually. Community opposes GAG pooling as a mechanism because it risks redistributing funds away from the schools and children they are intended to support. Funding for SEND should be ring-fencing and there should be public accountability for how inclusion funding is spent.

## **Conclusion**

Community Union is supportive of the direction of reform but is clear that good intentions, elegant architecture, and partial investment will not be enough. The test of this reform will be whether a child with SEND receives the right support at the right time, in the right setting, close to home — and whether the professionals working with that child have the skills, time, and resources to deliver it. That outcome depends on decisive action on workforce, funding, early years infrastructure, and enforceable accountability. Without these, the reforms risk reproducing the adversarial, postcode-lottery system they are designed to replace.