



## St Helens Parent Carer Forum

### **Response to the SEND Reform Consultation: “*SEND Reform: Putting Children and Young People First*” – 11th May 2026**

Listen 4 Change has operated as the Department for Education funded Parent Carer Forum (PCF) in St Helens for over 12 years, working in close partnership with the Local Authority and the Integrated Care Board to amplify parent carers’ voices and improve the design and delivery of education, health, and social care services.

On 5<sup>th</sup> May 2026 we held two consultation events with parent carers to discuss the proposals outlined in the Schools White Paper and SEND Reform Consultation and to gather parent carer feedback. This submission reflects the views and concerns raised by the 29 parent carers that attended those sessions.

---

#### **1. Overall View of the Proposals**

Parent carers support the principle of reform where it improves earlier identification of needs, earlier access to support, more knowledgeable school workforce, strengthens mainstream inclusion, increases access to specialist expertise, and reduces the need for families to fight for support.

However, the overwhelming view from parent carers is that the current proposals are not adequately funded, realistically deliverable or properly accountable and will dilute children’s rights and legal protections rather than improving outcomes.

There is significant concern that the proposals shift responsibility onto schools while simultaneously weakening the legal protections and routes of redress families currently rely upon. Key issues raised were the loss of legally enforceable provision, increasing the threshold for accessing a statutory assessment, narrowing the routes of challenge, placing unrealistic delivery expectations on schools without the staffing and expertise, and lack of accountability if the system doesn’t work.

Parent carers stressed that the Children and Families Act 2014 and the SEND Code of Practice already contain strong principles and duties around co-production,

collaboration and joint working, evidence-based decision making, early identification of needs, quick access to specialist support and preparation for adulthood and post-16 transitions. Lived experience of many families suggests the current system is in crisis due to inadequate funding for local authorities and schools, severe workforce shortages, specialist services are overstretched, and accountability mechanisms are weak resulting in legal duties under the current legal framework not being consistently complied with.

Parent carers repeatedly expressed the view that SEND reforms should focus on adequate funding, workforce investment to develop skills and knowledge, increasing specialist capacity, stronger accountability and enforcing consistent implementation of existing legal duties. Reform should not fundamentally weaken or replace the current legal framework.

---

## **2. Trust in the System**

These proposals ask parent carers to place significant trust in schools and services at a time when trust is already very low. Many parents described existing experiences of unmet needs, struggles to secure appropriate provision and unlawful decision making.

Against this backdrop, proposals that reduce enforceable rights while increasing school responsibility create serious anxiety. Parent carers repeatedly stated that legal rights matter precisely because the current system too often fails to deliver support voluntarily.

---

## **3. Access to Assessments and Support**

Parents carers are concerned that access to the three proposed layers of support for children with SEND appears heavily dependent on school staff identifying and recognising SEND. Lived experience suggests this creates particular risks for children who mask difficulties, present differently across settings, have uneven developmental profiles, or appear to cope academically while experiencing significant emotional, sensory, social, or functional difficulties.

Families are worried that children whose needs are less visible or less easily recognised within the classroom environment may be overlooked, resulting in some children no longer qualifying for support despite experiencing substantial challenges in daily life and education. Families worry that, without access to a robust statutory assessment undertaken by specialists, some children will be missed and left unsupported.

Parent carers consistently emphasised that the success of any SEND system depends on accurate assessment and correct identification of need. A very significant concern is that assessment of needs under the proposed reforms will be less robust than the current system, with assessments increasingly being carried out at school level, potentially by a senior member of staff or SENCO rather than being informed by a multidisciplinary process involving professionals with specific expertise in speech and language, occupational therapy, educational psychology, sensory needs, communication, regulation, and functional presentation.

There is significant concern that schools and SENCOs alone cannot realistically undertake the depth of assessment required for complex SEND profiles. Parent carers are concerned that assessments carried out primarily by school staff, rather than appropriately qualified specialists, may lead to inaccurate or incomplete identification of need. Parents believe that if assessment quality reduces, support quality will inevitably decline. There is a real concern that children will lose years in inappropriate interventions supporting misunderstood, misdiagnosed needs.

Families fear this could have wider consequences beyond educational provision. If a child's needs are not fully recognised, evidenced, and clearly recorded, this may affect access to other forms of assessment and support, including diagnoses, social care assessments, health provision, and wider disability-related services and support.

Those parents with older children pointed out that the 'new' proposals appear to be reintroducing features of the pre-2014 system of School Action, School Action Plus and Statements of SEN, which was overhauled through the Children and Families Act 2014. This system was widely seen as difficult to navigate, with delays in securing support and too many children having to reach relatively high thresholds before receiving meaningful help, while only those with the most complex needs were entitled to statutory protection. Families questioned how far the current proposals represent genuine reform or innovation, rather than a move backwards.

#### **4. Individual Support Plans (ISPs)**

Another major concern is that ISPs will replace EHCPs for the majority of children but will not be legally enforceable. This was seen as one of the most serious weaknesses in the proposals. If the provision described in an ISP is not legally enforceable, then the ISP risks becoming an administrative exercise rather than a meaningful offer of support.

There was also strong concern that annual reviews of ISPs are insufficient - children's needs can change rapidly, and support must be responsive and adaptable.

Families also do not believe it is realistic to expect SENCOs to produce meaningful, high-quality ISPs for every child with SEND while also managing wider inclusion

responsibilities. There is strong concern that shifting support away from individual legal entitlement, towards standardised, school-managed provision means plans will be generic, specialist evidence will be missing and implementation quality will vary significantly – another postcode lottery!

---

## **5. Specialist Provision Packages (SPP)**

Parent carers repeatedly challenged the move from bespoke provision to meet individual needs towards categorization into predefined bundles of provision linked to a broad profile of needs. Families stressed that children do not fit neatly into broad categories. Many children present with overlapping communication, sensory, cognitive, emotional, physical, and regulatory needs. A limited package-based model risks oversimplifying complexity and leaving some children without the tailored support they need to access learning.

There was also concern that the term “most complex” has not been defined. Parents fear this leaves too much room for restrictive interpretation, inconsistent application, and will likely miss children whose individual needs may appear moderate in isolation but are significant when considered cumulatively.

There is concern that some children (e.g. those with Down Syndrome) may be excluded from mainstream and pushed toward specialist placements - not because they need them, but because they are broadly categorized into a SPP that mainstream schools cannot deliver. Parents fear this could reduce genuine parental choice.

The proposal for SPPs to be reviewed at least every five years has raised concern among parent carers. Families are skeptical that, if the number of costly EHCPs remains high, eligibility criteria could gradually be tightened by altering the provision contained within SPPs. Parents fear this could result in children no longer meeting the threshold for an EHCP, not because their needs have reduced, but because the definition or level of provision within the SPP has changed. This creates concern that access to EHCPs may become increasingly restricted over time even where children’s underlying needs remain unchanged.

---

## **6. Changes to Education, Health and Care Plans (EHCPs)**

Parent carers are deeply concerned about the proposed changes to EHCPs.

There was strong concerns around the proposed shift in statutory assessments eligibility criteria from considering individual special educational needs and special educational provision to meet those needs, to whether a child requires a pre-

determined package of provision. Parents do not believe this approach reflects the complexity of children's profiles.

Parent carers understand from the proposals that EHCPs would no longer be what families currently know them to be. EHCPs appear likely to become broader framework documents identifying Areas of Development and the best-fit Specialist Support Packages, while the specificity of needs and detailed day-to-day provision is moved into non-enforceable Individual Support Plans (ISPs).

Parent carers strongly felt that these would be EHCPs in name only - they would no longer be child-centred and families would lose the enforceability of the day-to-day provision they currently depend upon, making it much harder to secure the right support, to challenge inadequate provision, and to ensure that children's needs are properly met in practice. The substance of an EHCP will have changed so significantly that it is misleading to suggest EHCPs will continue in any meaningful equivalent form.

There is deep concern that support will increasingly be determined by what fits the system rather than by individually assessed need. This risks losing the person-centred approach that is essential for many children with SEND.

---

## **7. Reduced tribunal powers and weaker redress**

The proposed reduction in tribunal powers was viewed as one of the most worrying aspects of the reforms. Parents currently rely on tribunal as one of the few mechanisms capable of correcting poor local authority decision-making. Families are deeply concerned about the reduction in the tribunal's ability to specify the child's individual's needs and appropriate provision to meet those needs, to secure appropriate placements and to challenge unsuitable provision and placement decisions.

Given the high proportion of SEND appeals that are upheld in favour of families, parents questioned why the Consultation focuses on limiting access to appeals, rather than seeking to understand why so many poor decisions are made and how earlier processes and assessments could be improved to better meet children's needs without forcing parents to seek legal resolution.

There was also concern that if tribunal powers are weakened, families may be forced toward judicial review and disability discrimination claims. These routes were seen as expensive, inaccessible, adversarial and unrealistic for most families. They also rarely provide a timely or meaningful remedy for the child.

## **8. Placement Choice**

A major concern was the reduction in parents' ability to challenge placement decisions where a setting cannot meet need, where a placement is unsuitable in practice, or where the named setting is not the one that best matches the child's profile. The proposals were understood as significantly weakening the current safeguard.

Parents were particularly concerned that the Tribunal would no longer have the power to name or assign an appropriate placement in the way families currently rely on. This matters because placement is often central to whether a child can access education safely and successfully. If families lose the ability to secure an appropriate placement through an accessible route of appeal, then rights become theoretical rather than real.

A reliance on judicial review to challenge placement decision was discussed as an unrealistic alternative for most families because it requires legal support, carries significant financial risk, and is far less accessible than tribunal.

---

## **9. "Experts at Hand" Model**

Parents welcomed the principle of schools having quicker access to specialist advice, but raised serious concerns about whether the proposed "Experts at Hand" model will be meaningful in practice. The concern is that the service appears advisory rather than direct input, that specialist time per child may be extremely limited and whether Educational Psychologists and specialist therapists currently exist in sufficient numbers to support this model effectively.

If specialists do not have time to assess children thoroughly, observe them in context, understand functional needs, and help identify the right interventions, then the quality of decision-making will be weakened. Parents were clear that accurate assessment and determining the right support are central to good outcomes. A light-touch advisory model will be insufficient to replace the more robust statutory assessment of need.

Families repeatedly report difficulties in getting schools to implement the advice and recommendations of specialist services and experts, particularly in relation to sensory diets in schools. Occupational Therapy and other specialist services often provide clear guidance for targeted interventions for individual children; however, this is not always implemented within schools due to workload pressures and competing priorities. Parents do not believe that shifting further responsibility onto schools, without significantly improving capacity and training, will deliver the transformative change that is being suggested.

Concerns were also raised over how extremely stretched specialist schools staff will deliver an outreach programme to upskill mainstream settings without negatively impacting the quality and safety of provision delivered within their own setting.

Parents repeatedly highlighted that the term “experts” is used throughout the proposals without sufficient clarity. Families want clear definitions regarding qualifications, professional standards, specialist expertise, lived experience and accountability. Without this clarity, parents fear inconsistent interpretation and variable quality – another postcode lottery!

Parent carers are concerned that there is only brief mention of occupational therapists within the proposed Experts at Hand model. Occupational therapists are essential specialists for children with sensory processing, regulation and functional participation needs, yet their role does not appear to be clearly embedded within the proposals.

---

## **10. Workforce Pressures, SENCO Capacity and Capability**

There is significant concern about the expectations being placed on SENCOs through these reforms without clear, ring-fenced funding for the additional time, training and responsibilities this will require.

While SENCOs are required to complete a mandatory qualification, current legislation does not require them to already hold this qualification before taking up the role. Parents noted the considerable variation in experience, training, confidence and capability across schools while SENCOs are still undertaking their qualification and developing specialist expertise.

These reforms will place increasing responsibility on SENCOs to coordinate complex systems of support, yet there is little detail about how schools will be resourced to provide the protected time and high-quality training to deliver this effectively. Parent carers are concerned that these reforms do not address the unequal experiences children and families face depending on the capacity and expertise available within individual schools.

There was specific concern about the expectation that schools, and in practice SENCOs, will be responsible for producing Individual Support Plans for every child with identified SEND while also being expected to balance strategic SEND leadership roles, teaching commitments, operational responsibilities, coordinate provision, review plans, support teaching staff, engage with families, manage transitions, respond to complaints, and deliver on a much broader inclusion agenda. Parents do not believe this is realistic.

SENCOs are already under significant pressure. The expectation that they will have sufficient time to produce meaningful, detailed, high-quality ISPs for every child with SEND, and then ensure those plans are implemented effectively, was seen as wholly implausible.

This raises serious concerns about quality. If every child must have an ISP, but the workforce does not have the time or capacity to produce them properly, then there is a real risk of plans becoming generic, inconsistent, or insufficiently informed by specialist evidence. Parents strongly felt that the proposals underestimate the professional time required to assess need accurately, plan appropriate provision, implement, and review impact meaningfully.

Parents also highlighted wider workforce instability with school staff leaving the profession, specialist shortages, overstretched services and inconsistent SEND training.

---

## **11. Mainstream Inclusion and Environments**

Parents support inclusion in principle but strongly challenged the assumption that inclusion can be achieved simply by creating inclusion bases, improving the training offer, developing national standards and reforming funding. There was widespread concern that many mainstream schools are not equipped to meet need effectively.

Concerns remain about classroom size, sensory suitability, including noise reduction, soundproofing, low-arousal spaces, behavior and attendance policies, insufficient staffing and equipment, a lack of SEND expertise, curriculum pressures and whether school buildings will genuinely be fit for children with SEND.

Families are concerned that there is no reference to the active involvement of occupational therapists in the planning, creation and design of Inclusion Bases. Occupational therapists have specialist expertise in understanding how environments, routines and sensory demands impact a child's ability to learn, participate and feel safe within school. Inclusion Bases should not simply be additional spaces within schools; they must be carefully designed environments that actively support sensory regulation, accessibility, participation and successful inclusion for children with SEND. Without meaningful OT involvement, there is a risk that Inclusion Bases will not meet the needs of many children they are intended to support.

Parents raised serious concerns about the capacity and sustainability of Inclusion Bases. Many existing bases are already full, under pressure and inconsistently resourced. Families questioned how increased demand will be managed, what

happens when bases are at capacity or how children will be supported if the provision they need is unavailable at their local school.

Parents raised concerns that national SEND training will not be compulsory and will very much depend on the commitment of individual settings - continuing the current postcode lottery.

Parents stressed that inclusion depends on the right environments, approaches, and culture, and these changes take time and sustained investment. Physical presence is not the same as inclusion.

---

## **12. Complaints Processes and Governance**

The proposal to move toward school complaints procedures and independent panels for disputes with SEND provision and delivery did not inspire confidence. Parents fear this could damage parent-school relationships, increase conflict, create inconsistency, overwhelm schools and place unrealistic expectations on governors and trustees.

There is concern that volunteer governors and trustees may not have specialist SEND expertise, sufficient time, adequate training and independence from school leadership structures so as to be able to effectively manage the volume and complexity of complaints.

Families are skeptical that a school-level complaints systems can provide meaningful or impartial remedy, particularly where neighbouring schools or academy-linked professionals may be involved at an escalation level.

---

## **13. Areas of Development**

Parents strongly objected to the removal of mental health in the five Areas of Development and the idea that removing mental health needs will bring social, emotional and mental health in line with the other areas of development which do not lend themselves to clinical intervention. Parents cite that physical needs, motor needs, sensory needs and speech and language needs all require clinical interventions yet have not been removed from the SEND system.

Families consistently described how unmet need, overload, exclusion, unsuitable environments and lack of support frequently contribute directly to mental health deterioration. Parents stressed that mental health needs are deeply interconnected to special education needs and cannot be treated as entirely separate to the SEND system.

Similarly, parent carers expressed concern that the broad and all-encompassing category of Cognition and Learning has been narrowed within the reforms to a much more specific focus on Executive Function. Families noted that the proposals make no reference to other important areas of cognitive difficulty, including processing speed, problem-solving, reasoning, and longer-term memory difficulties, and are concerned that children experiencing these challenges may no longer be adequately recognised within the SEND framework.

---

#### **14. Transitions and EHCP Review Points**

Parents were especially concerned about the review of EHCPs at the end of key stages, fearing support may be reduced or removed precisely when children are most vulnerable.

Parent carers are very concerned about transitions between key stages, school placements and through the proposed layers of support. Children with SEND often depend heavily on consistency, predictability, trusted relationships and carefully planned support. Any disruption caused by changes in placement or movement between layers of support could have a significant negative impact.

There was particular concern about transition from primary to secondary, including unclear arrangements for children moving between inclusion bases and no clear guarantee of equivalent provision.

There was also repeated concern that children may be penalised for doing well - parents fear that progress achieved because support is effective may be used as justification for reducing provision.

---

#### **15. Summer-Born Children, Deferred Entry, and Education Out of Cohort**

Parents raised concern about inconsistency around summer-born children, deferred entry practices, and decisions relating to education outside a child's normal age cohort.

Parents highlighted that some neighbouring local authorities operate what are effectively "automatic yes" policies for deferred entry and education out of cohort requests, while families in St Helens experience far greater resistance and barriers to securing the same arrangement. This creates an inequitable situation where access to an approach considered appropriate and beneficial in one area may be refused in another.

For some children, especially those with developmental delay, neurodivergence, disability or emerging SEND, deferred entry can be supportive and appropriate. It may allow the child to begin school at a more developmentally suitable point, reduce distress, improve long-term outcomes, and avoid more costly support needs later.

Parents felt deferred entry and education out of cohort should be recognised as legitimate early intervention and as a potentially preventative approach, with clearer and more consistent national expectations to avoid postcode variation in decision-making.

---

## **16. Children Outside Full-Time Education and EOTAS**

Parents expressed significant concerns that the proposals do not adequately address children who are not in full-time education, children who are out of education entirely, or young people not able to access traditional school-based pathways. In particular, parents noted the absence of clear consideration of Education Otherwise Than At School (EOTAS) packages for children for who the conventional school model itself is not accessible or safe, even with support, and whose needs may require more flexible, bespoke arrangements. This was seen as a serious omission. Parents are concerned that the reforms are built too heavily around assumptions of mainstream participation and do not sufficiently account for children requiring flexible provision, bespoke arrangements and alternative pathways.

Parents also noted limited consideration of young people who are not in education, employment or training (NEET). Proposals do not set out clearly how support will work for those whose needs do not align with standard pathways.

---

## **17. Home-to-school Transport**

Home-to-school transport remains a major concern for families. Transport is often essential for children and young people with SEND to access education safely, consistently, and successfully. Parents stated that the proposals do not clearly explain how transport eligibility will work, how transport decisions will link to placement decisions, or how accessibility and safety needs will be considered.

Parents raised concerns about how transport and placement arrangements will operate within the proposed Specialist Provision Package (SPP) model. In particular, families questioned what will happen where a child requires support from more than one SPP, but their local school or inclusion base is only commissioned or resourced to deliver one package.

There is concern that children may be required to travel significant distances to access combined provision, or that families may be forced to choose between placements that only partially meet need.

Families are concerned that the proposals do not provide sufficient clarity about how multi-package needs will be accommodated, who will be responsible for coordinating provision across settings, whether transport support will be expanded to reflect increased travel demands, and what safeguards will exist if no local setting can deliver the combination of support a child requires.

Parents believe these issues require much clearer planning and accountability within the reform proposals.

---

## **18. Funding and Deliverability**

Parent carers consistently questioned whether the proposed funding is sufficient to deliver the scale of reform described. Although the headline figures sound significant, they do not seem enough to provide the staffing, training, equipment, environmental adaptations, and specialist capacity needed to make inclusion meaningful.

Families report that schools are already struggling with staff shortages, budget pressures, rising levels of need and limited access to specialist support. Funding that equates to a part time teaching assistant per primary school, two teaching assistants per secondary school, alongside approx. £142 per teacher per year for SEND training and one day of Expert at Hand specialist input per child per year is insufficient to significantly change this picture in practice. Overall, the proposals feel more aspirational than deliverable.

Families repeatedly stressed that mainstream inclusion cannot succeed through policy statements alone. It requires sustained long-term investment, specialist workforce growth, whole-school environment improvements and national curriculum adaptations – all of which need to be adequately funded and successfully embedded before reducing access to statutory assessments, legally enforceable provision and the legal right to challenge poor decisions.

---

## **19. Accountability**

Parents expressed serious concern about accountability. Families repeatedly asked where accountability will sit within the proposed system, including who will be responsible if agreed provision is not delivered, if a child is excluded, if a child

experiences emotional harm as a result of unmet need or unsuitable provision, or if a child is unable to access education safely and consistently.

Parent carers also questioned whether volunteer governors and trustees will realistically have the time, capacity, specialist knowledge, and accountability required to effectively oversee SEND provision, ensure quality, improve outcomes, and drive meaningful inclusion across schools and settings.

Parent carers felt that a school-based complaints process would be insufficient to hold the same school meaningfully accountable. There was also significant skepticism that escalation to an independent panel, potentially involving SEND “experts” from neighbouring schools, would provide an effective, impartial, or sufficiently robust mechanism for resolving disputes or securing appropriate provision.

Parents believe weakening enforceable rights without introducing stronger safeguards creates substantial risk for children and young people.

---

## **Conclusion**

A significant proportion of what is being proposed already exists in St Helens. The local authority has operated TESSA (Triage for All Education Support and Specialist Advice) for several years, which provides a coordinated multi-professional service offering targeted education support, specialist advice and intervention to education settings. As a result, education settings already have access to specialist input and timely advice and guidance from experts.

St Helens already has resourced provisions and SEN units within some primary schools, several secondary schools and both post-16 colleges. In recognition of the fact that mainstream settings are increasingly struggling to meet the more complex needs of children and young people with SEND, there is also an established outreach offer from some of our specialist provisions.

Alongside this, the local authority provides a strong training offer for settings, with parent carers reporting a noticeable improvement in understanding of SEND in schools that have engaged with training available through initiatives such as Autism in Schools and Partnership for Inclusion of Neurodiversity in Schools.

However, despite this existing infrastructure, there remain marked inconsistencies between settings that choose to engage with the local authority offer and those that do not. These proposals do not address the ongoing reliance on the commitment of individual settings to implement, embed and prioritise SEND consistently.

Parent carers support the aim of better early help, inclusive mainstream practice, and more responsive services. However, they do not support reforms that remove the right to statutory assessment, weaken specificity, replace bespoke, tailored provision with a “one size fits all” categorization model, reduce enforceability, narrow routes of challenge, and place unrealistic expectations on schools without the time, workforce, or specialist infrastructure to deliver what is being promised.

The consistent message from the discussions was that good outcomes for children and young people with SEND depend on high-quality multidisciplinary assessment, properly informed planning, sufficient specialist involvement, enforceable provision and access to appropriate placements with meaningful accountability and accessible routes of redress. Without those foundations, parent carers fear the proposals risk creating a system that is substantively weaker for children, setting them and the professionals that support them up to fail rather than building a genuinely inclusive SEND system.



### **St Helens Parent Carer Forum**

Website: [www.listen4change.uk](http://www.listen4change.uk)

Email: [listen4change@outlook.com](mailto:listen4change@outlook.com)

Facebook group - <https://www.facebook.com/groups/1815692118888096>

Facebook page - Listen4Change, St Helens Parent Carer Forum

Instagram - [@listen4change\\_sthelenspcf](https://www.instagram.com/listen4change_sthelenspcf)