



Chair: Cllr Graham Butland
Chief Executive: Cairistine Foster-Cannan
Emailed to: SENDreform.CONULTATION@education.gov.uk
Contact: Kate.O'Driscoll@localgoveasteng.gov.uk
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Local Government East and Eastern Region Association of Directors of Children's Services response to the SEND reform: putting children and young people first consultation.

About us

[Local Government East \(LGE\)](#) is a cross-party, politically led membership body representing the fifty councils and one combined authority across the East of England. [The Eastern Region Association of Directors of Children's Services \(ADCS\)](#) is made up of the Directors of Children's Services from the region's eleven upper-tier councils: Bedford, Cambridgeshire, Central Bedfordshire, Essex, Hertfordshire, Luton, Norfolk, Peterborough, Southend-on-Sea, Suffolk, and Thurrock.

Introduction

Local authorities in the East of England welcome the Government's ambition set out in the Schools White Paper and accompanying SEND consultation that every child and young person accesses a high-quality, inclusive education that meets their needs, rooted in their local communities. An inclusive education system that supports more children with SEND in local mainstream schools and provides specialist settings for children who need it, will depend on improved workforce expertise and capacity, accountability, sufficient funding, realistic timelines, and a cross government approach, as detailed below.

LGE and the Eastern Region ADCS welcome the opportunity to respond to the Department for Education's consultation on [SEND reform](#). Our response highlights the key points welcomed by councils in the East of England and further measures needed to mitigate the challenges facing the SEND system, focussing on key issues in the region. The response has been informed by regional networks of councillors and council officers, and discussion with the national local government sector bodies; ADCS, Local Government Association (LGA) and County Councils Network (CCN).

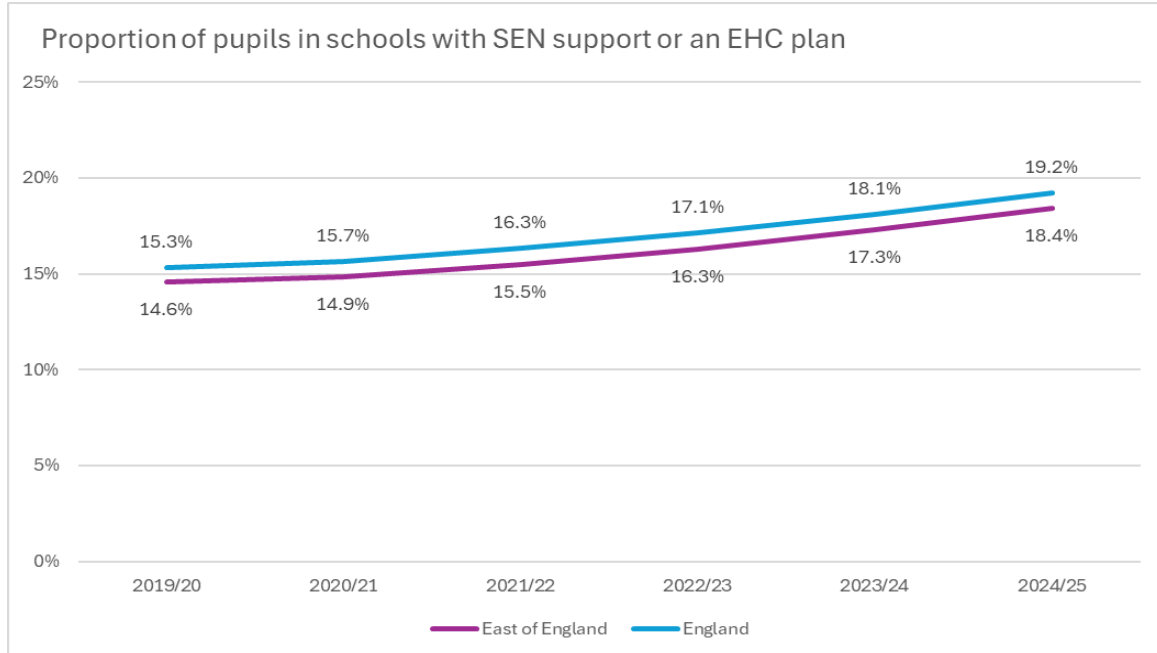
The regional context

Educational outcomes and experiences are not improving for many children and young people with Special Educational Needs and Disabilities (SEND). Increasing demand for Educational Health Care Plans (EHCPs), workforce shortages across education and health, and historic funding challenges have placed unprecedented financial pressure on councils in the East of England.

Increase in pupils with SEN support and an EHCP

The national increase in the number of children and young people with special educational needs (SEN) support and EHCPs is clearly mirrored in the East of England. Every local authority in the region has seen an increase in the proportion of pupils with SEN support and an EHCP. 18.4% of the school population in the region is known to have SEN, of which 13.3% have SEN support in place and 5.1% have EHCPs.

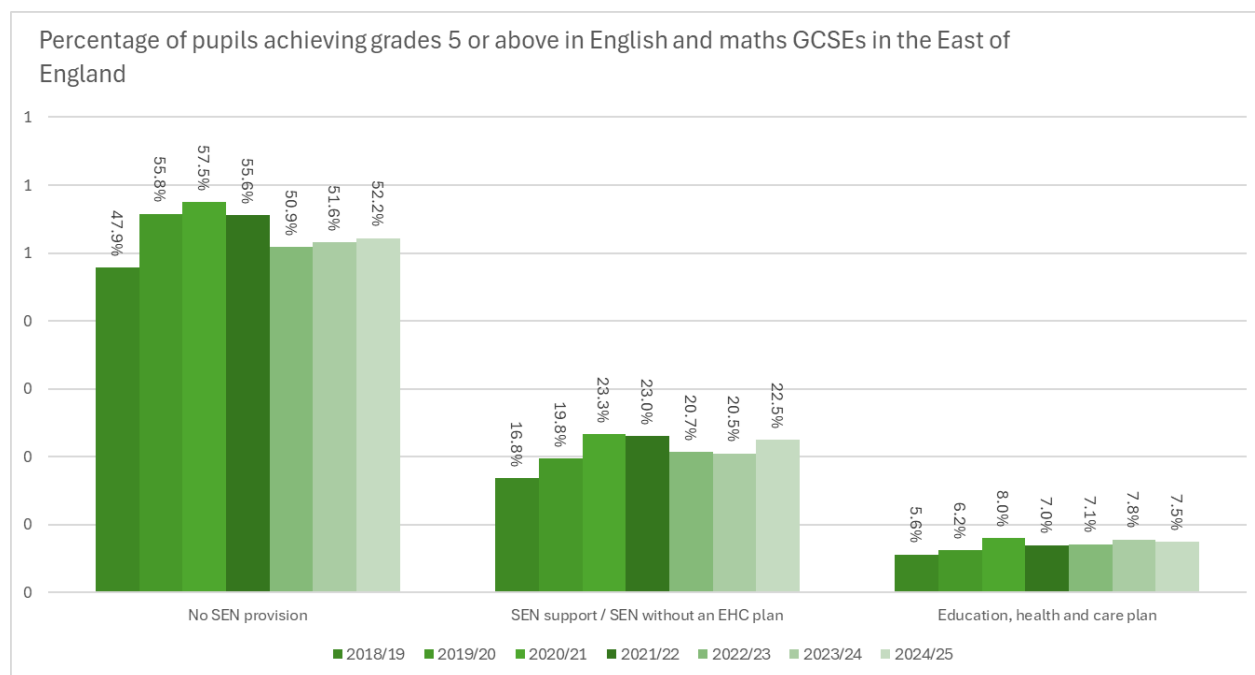
SEN support has risen by 20.9% but the proportion of pupils with an EHCP has risen by a much larger proportion of 65.5%. From January 2019 to January 2025, there was an 83.1% increase in the number of EHCPs in the region, higher than the national 80.4% increase over the same period. Since 2020, the number of requests for an EHC needs assessment has more than doubled in the East of England. Rising numbers of requests for EHCPs and appeals have led to substantial funding deficits for councils in the region.



Source: [Special educational needs in England, academic year 2024/25 \(School Census\)](#) and [Education, health and care plans \(SEN2\), reporting year 2025](#)

Education attainment

In the academic year 2024 - 2025, 78% of all SEN pupils in the region did not meet the expected standard in reading, writing and maths for Key Stage 2.¹ The number of children with SEN support and EHCPs achieving English and maths GCSEs grades 5 or above is markedly lower than their peers without SEN provision.



Source: [Key stage 4 performance, academic year 2024/25](#)

Home to school transport costs

Historic gaps in specialist and alternative provision, and a diverse geography made up of urban, coastal and rural areas, have led to a significant number of children and young people with SEND in specialist settings outside their local area, creating growing home to school transport costs for local authorities across the region.

NHS waiting lists

NHS waiting lists for children in the region seeking assessments for autism and ADHD, and for mental health support, are preventing many children and young people from getting timely and adequate support in schools and health services. In January 2026, there were nearly 5,000 children in the region on waiting lists for speech and language therapy.²

¹ [Release home - Key stage 2 attainment - Explore education statistics - GOV.UK](#)

² NHS England Community Health Services SitRep – Children and Young People Services March 2026 (January 2026 data) Prepared by: Insight Unit, Primary Care and Community Services programme

Structural change in councils and ICBs

This rising demand is all within the context of councils and Integrated Care Boards (ICBs) undergoing seismic structural change in the East of England.

Key points

A new tiered support model (Questions 3-6)

We broadly welcome the introduction of a tiered support model of Universal, Targeted (including Targeted Plus) and Specialist for children and young people with SEND. The current binary system of distinguishing between support for those with or without an EHCP has led to a focus on statutory plans rather than needs-led responsive support.

A tiered approach has the potential to foster inclusive mainstream education and identify and support children and young with SEND earlier and more effectively. However, its success depends on a shared and lived understanding of what inclusion and belonging means for children, families, schools, and local partners.

Many schools take a 'whole school approach' to inclusion and a graduated approach, and learning should be taken from areas where this is already working well, for example as seen in schools supported by Essex County Council's Inclusion Strategy and Framework.³

However, there is a risk of continuing to drive escalation to statutory plans if thresholds for support are rigid and school staff do not have adequate capacity, knowledge and experience.

There will continue to be children and young people with complex needs that require specialist settings across local areas and the region, which is dependent on sufficient specialist staff, including therapists and nursing support.

National Inclusion Standards and National Training (Questions 11-12)

A Universal offer that is fully integrated with targeted and targeted plus support will require high quality teaching and training in inclusion and SEND for school leaders, teachers and wider staff, supported by sufficient funding. National baselines across every early years setting, schools and post-16 providers will be crucial for improving inclusive practice, ensuring consistency and accountability.

The National Inclusion Standards and National Training have the potential to link education, health and care outcomes more effectively and reduce variation in schools. These should be co-produced with children and young people, families, teachers, SENCOs and SEND practitioners. The standards must be clearly aligned

³ [Inclusion Framework - YouTube](#)

with the Ofsted Inspection Framework to drive meaningful and sustainable change.

Inclusion Bases (Question 18 and 19)

It is important that local authorities and health partners work with schools to develop Inclusion Bases that meet all SEND needs and prevent the risk of variation between schools. Inclusion Bases can only meet the full range of needs if they are supported by sufficient staffing, training and resources across both education and health. Strong links between Inclusion Bases and mainstream classrooms are essential, so that inclusive practice is strengthened across the whole school, not only in the Inclusion Base.

Strengthened local collaboration and 'Experts at Hand' (Question 20)

We welcome the measures to strengthen collaboration between schools, councils and the NHS because effective support for children and young people with SEND cannot be achieved in isolation. Strong local partnerships will be vital for ensuring that children and young people quickly access more targeted support if needed.

The investment of £1.8 billion over the next three years to fund the 'Experts at Hand' offer is an opportunity to improve much needed access to specialist education and health support. The offer will require robust joint commissioning arrangements across education, health and social care, and shared data and ownership across agencies.

Further detail is needed on how this funding will be allocated to councils and ICBs. Roles and responsibilities must be clearly defined to avoid duplication and delay. We are concerned that the insufficient pipeline of speech and language, and occupational therapists, and educational psychologists, exacerbated by proximity to London and rural and coastal areas in the region will raise expectations which cannot be met.

Independent Special Schools (Question 29)

We broadly support updating the law for independent special schools to ensure children receive suitable, high-quality placements and that councils pay fair, reasonable costs for them. However, it is important to recognise the role the independent sector plays in meeting the needs of children with highly complex needs, where local maintained provision may not be available.

Local SEND Groups (Question 32 and 33)

We welcome the proposal that all schools must join local partnerships or clusters of schools to pool funding to better meet the needs of children and young people with SEND. We also welcome the proposal that councils will have a central role in convening these groups within local areas and see this as a vital opportunity to share best practice and ensure resources are directed towards evidence-informed interventions. These arrangements will require clarity on governance, roles and responsibilities, ensuring any disagreements about provision or funding can be resolved efficiently and fairly. Trust footprints and geographical boundaries do not always align, and arrangements must be consistent nationally.

Local Strategic SEND Partnerships (Question 34, 35 and 26)

We welcome the proposal to strengthen existing local strategic SEND partnerships to enable education, health providers, ICBs, local authorities and parent representatives to work together on strategic planning on SEND including the Experts at Hand offer. For local strategic SEND partnerships to work more effectively, there must be a clear national vision and greater clarity of purpose.

We welcome the national roll out of Best Start Family Hubs with a specific role for supporting children and families with SEND. Engagement with early years providers and family hubs offers significant potential to strengthen a local collaborative approach, provided they are adequately funded.

Local SEND strategies should outline how partners will drive continuous improvement through shared outcomes jointly owned across education, health and care, supported by strong governance and meaningful co-production with families. Updating the SEND Code of Practice should ensure that the different responsibilities for partners in local SEND systems - councils, health and education - are clearer.

Capacity during structural change

We are concerned about the capacity in councils to translate and deliver the ambition and principles of the reforms into practice, at the same time as significant reform to children's social care, Local Government Reorganisation (LGR) and Integrated Care Boards (ICBs) in the region.

Local authorities and ICBs are undergoing seismic concurrent structural change in the East of England. From April 2026, the previous six ICBs in the region have merged to form three larger organisations; Essex, Central East (covering Cambridgeshire Hertfordshire and Bedfordshire) and Norfolk and Suffolk. The Government recently confirmed Local Government Reorganisation (LGR) changes in Greater Essex and Norfolk and Suffolk, with announcements for Hertfordshire

and Cambridgeshire expected in the summer. All new unitary councils will be established by 1 April 2028.

These concurrent structural reforms are adding complexity operationally and reducing capacity in an already stretched council SEND workforce. ICBs also require greater capacity to fulfil their core function to meet the needs of needs of children and young people with SEND, supported by clear accountability.

A sustainable funding model

£4bn of new funding does not address a system with a £6bn and growing high-needs deficit. The recent announcement that 90 per cent of councils' historic Dedicated Schools Grant (DSG) deficits up to March 2026 will be written off is welcome. However, the 90 per cent write-off implies that councils will have to manage a residual debt of around £500 million, while the OBR has forecast that new deficits of £8.7 billion will then accrue over 2026-27 and 2027-28.

We urge the Government to commit to ensuring that all DSG deficits are written off ahead of the statutory override ending in March 2028 to both address current capacity gaps and provide the long-term resources needed for transitioning to the new system.

Demand for EHCPs and specialist provision is unlikely to reduce in the short to medium term, meaning DSG and workforce pressures will continue. Local councils in particular need additional funding to meet the growing need for home-to-school transport for children and young people with SEND in the short to medium-term.

Realistic timelines

Whilst we recognise the need for a decade long programme of change to achieve the scale of the shift required, it is important that realistic timelines are carefully managed and subject to ongoing review.

The condition that Local SEND Reform Plans are co-produced and submitted to the Department for Education by 19 June 2026 to unlock the 90 per cent write-off is presenting immediate resource challenges. It is creating unnecessary complexity for councils who must deliver statutory duties for SEND now, whilst at the same time design local improvements needed in preparation for legislative change. Changes to the ICB boundaries and functions, and reductions in the workforce, are impeding their ability to co-produce local SEND reform plans in preparation for the proposed reforms.

Cross-government approach

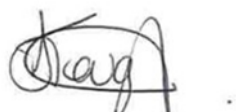
The SEND reforms should work hand in hand with the Government's 10 Year Health Plan, to ensure that children and young people can access the education and healthcare support they need for childhood to ensure successful transitions into adult life.

Local authorities in the region look forward to working in partnership with the Department for Education, the Department for Health and Social Care, and the Ministry of Housing, Communities and Local Government, to ensure both short-term stability and long-term sustainability of the SEND system, to improve outcomes, experiences and life chances for children and young people.

Yours sincerely,



Councillor Richard Siddall
Local Government East Lead Member for Health and Wellbeing



Sara Tough OBE
Chair of the Eastern Region ADCS and Director of Children's Services, Norfolk
County Council