



# Somerset Parent Carer Forum CIC Ltd.

The independent voice for families from birth to 25 with additional needs or disabilities

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Dear consultation response team

This consultation response has been developed by Somerset Parent Carer Forum (PCF) following extensive engagement with our membership. We have actively gathered the views, experiences and feedback of parent carers across Somerset to ensure that this response reflects the real lived experience of families supporting children and young people with SEND.

We are grateful to all families who took the time to share their views, experiences and insights. Your contributions have been invaluable in shaping this response and ensuring that the voices of children, young people and their families are clearly represented. We recognise the time, energy and emotional effort involved in contributing to consultations of this scale, and we sincerely thank everyone who gave up their time to support this work.

Q1 - 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?

Children, young people, and families must be involved in decision-making from the start, not consulted after decisions have already been made. Many families felt the consultation process was inaccessible and more of a “tick-box exercise” than genuine engagement, which reflects concerns often raised locally.

There should also be recognition of the vital role of Parent Carer Forums in amplifying the voice of parent carers. However, these forums need to be properly resourced in order to effectively represent families and contribute meaningfully to co-production.

There should be a stronger national focus on co-production, with families recognised as equal partners whose lived experience is valued alongside professional expertise. Requiring clear evidence of co-production as part of funding and accountability arrangements would help ensure this happens consistently.



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In addition, there needs to be a shift away from “one size fits all” approaches and from a culture where parents are blamed for their child’s behaviour. Instead, professionals and teachers should work in genuine partnership with families, recognising that every child’s needs are different.

To ensure children, young people, and families have a genuine say, engagement must be accessible, inclusive, and ongoing. It should also clearly demonstrate how their views have influenced decisions and shaped outcomes.

### Q2 - How can we make sure that high-quality evidence and best practice inform decisions about SEND? Please share examples.

High-quality evidence and best practice should be central to SEND decision-making, but this requires greater investment and better sharing of learning.

There needs to be more funding for Educational Psychologists and professional assessments to ensure timely, evidence-based support for children and young people.

A national, accessible platform for sharing best practice would help schools and services learn from successful approaches. Funded opportunities for staff to visit and learn from other areas would also support shared learning, as schools often struggle to release staff due to costs and lack of cover. Providing funding for backfill would remove this barrier and help spread effective inclusive practice more consistently.

### Q3 How can we ensure that children are best supported by the Universal offer?

Children will only be well supported through the Universal Offer if it is properly funded and supported by strong external accountability.

Families consistently raised concerns about the lack of accountability and the significant variability in practice between schools. External oversight is essential, as schools assessing their own performance does not always lead to inclusive practice, which has already been seen in areas such as exclusions.



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There needs to be greater accountability for schools to ensure all children receive appropriate support and inclusive practice is consistently embedded. High-quality teaching should be central to the Universal Offer, including a strong focus on making learning accessible for all children through adaptive approaches and inclusive practice.

This must also be supported by a curriculum that celebrates each child's uniqueness, strengths and individual ways of learning, rather than expecting all children to fit a single model. While some academies demonstrate excellent inclusive approaches, others do not, creating an inconsistent experience for children and families. A stronger and more consistent accountability framework would help ensure the Universal Offer is delivered effectively for all children.

### Q4 - How can we ensure that children in the Targeted layer, are best supported?

Children in the Targeted layer will only be well supported if there is consistent practice, clear guidance and strong accountability across all settings.

As highlighted in response to Q3, families are concerned about the level of decision-making power sitting solely with individual settings. Due to the current variability in provision, many parents fear this could create a postcode lottery where support depends on the school a child attends rather than their level of need.

There needs to be clear national guidance on when children should access different layers of support. Currently, decisions such as placing a child on the SEN register can vary significantly between settings, often leading to conflict and distrust between parents and schools.

Clearer criteria, consistent expectations and external accountability would help ensure children receive timely and appropriate support regardless of where they live or attend school.

### Q5 How can we ensure that children in the Targeted Plus layer, are best supported?

Children in the Targeted Plus layer will only be well supported if funding is sufficient, protected and distributed fairly across settings.

Parents expressed significant concerns about whether schools will receive enough funding to deliver this level of support

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effectively. While the Inclusive Mainstream funding allocation appears substantial nationally, local calculations showed much smaller amounts in practice, for example around £59,300 for a large secondary school and only £5,000 for a small primary school. Families are concerned this will not be enough to meet increasing levels of need.

There is also concern that, without adequate funding, settings may be forced to decide which children can access higher levels of support because resources will not stretch far enough. These risks creating inconsistency and inequity in access to provision.

In addition, the reforms do not clearly demonstrate how SEND funding will be ring-fenced. Families are concerned there is a risk that funding intended for SEND support could instead be used to offset wider school budget deficits. Clear accountability, protected funding and transparent monitoring will be essential to ensure resources are used for their intended purpose and that children receive the support they need.

### Q6 - How can we ensure that children in the Specialist layer are best supported?

Children in the Specialist layer will only be well supported if provision remains individualised, rights-based and accountable.

Families expressed concerns that the definition of "complex needs" has not been clearly explained, meaning people are being asked to respond based on assumptions rather than clear evidence or detail. There are also significant concerns about national packages of support, as families feel children may be shoehorned into predetermined packages rather than receiving support tailored to their individual needs.

The current EHCP process includes specific, legally defined provision, and families are worried that this could be diluted under the proposed changes, reducing the level and specificity of support children receive.

There were also strong concerns about the lack of accountability and the potential removal of children and families' rights within the new approach. Changes to tribunal powers and their more limited role under new plans have added to these concerns. Many families feel this does not remove conflict from the system, but instead shifts where the battle takes place.

To ensure children in the Specialist layer are properly supported, there must be clear definitions, protected legal

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rights, strong accountability and genuinely personalised provision based on individual need rather than fixed packages of support.

### Q7 - How do you think early years settings, schools, and college can best support the mental health and wellbeing of children and young people?

Early years settings, schools and colleges can best support children and young people's mental health and wellbeing by creating inclusive environments where children feel understood, supported and able to thrive as individuals.

There has been a significant increase in children experiencing Emotionally Based School Avoidance (EBSA), and many families feel this is still not being effectively addressed. Early support and intervention before children reach crisis point is essential, with timely access to support that helps identify and respond to needs as soon as concerns emerge.

Initiatives such as Mental Health Support Teams are helping, but the biggest challenge for settings is having enough suitably trained adults with the time and capacity to provide meaningful support to children and young people.

Staff are often overwhelmed by the pressures of delivering a curriculum and meeting national targets that do not always reflect the realities of the modern world or allow for children's individuality and different ways of learning. Greater flexibility within the curriculum, alongside a stronger focus on wellbeing, relationships and inclusion, would help settings better support mental health.

Investment in staff training, protected time for pastoral support and approaches that recognise each child's strengths and needs are essential to improving wellbeing outcomes for children and young people.

### Q8 - 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.

This area received mixed feedback from families. Parent carers welcomed the inclusion of executive functioning, feeling this could help identify a greater number of children whose needs are currently overlooked.



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However, there were concerns about the sensory area, as families felt the descriptions lacked clarity and that Hearing and Vision Impairments were less clearly defined within the refreshed areas of development.

Another significant concern was the continued focus on identifying a "primary need." Families felt children should not be expected to fit into a single category or box, as many children experience overlapping and interconnected needs.

There was also strong concern about the removal of mental health from the areas of development. Families felt this appears contradictory to wider government policy, including the introduction of Senior Mental Health Leads and the commitment for Mental Health Support Teams (MHSTs) to achieve full coverage by 2029/30. These risks sending mixed messages about the importance of children and young people's mental health within education and SEND support.

### Q9 - 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?

Effective joint working for children with SEND in the early years requires strong joined-up governance arrangements to ensure a holistic and coordinated approach across early years providers, Best Start Family Hubs, health services and local authorities.

Clear communication between services is essential so that families do not have to repeatedly share information or navigate disconnected systems. There should be shared responsibility, clear pathways and consistent approaches to identifying and supporting children's needs early.

Parent carers must also be fully involved as equal partners in decision-making. Their lived experience and understanding of their child should be valued alongside professional expertise, with co-production embedded throughout planning and support arrangements.

There are concerns that the current SEND reforms focus too heavily on schools and education, without a strong enough emphasis on health and care. Effective early years support must take a genuinely multi-agency approach, recognising that children and families often need coordinated support across education, health and social care services.



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Strong accountability, consistent practice and early intervention will help ensure children receive timely, joined-up and inclusive support regardless of where they live.

Q 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.

The EYFS two-year-old progress check and the Healthy Child Programme development review should be more closely joined up, with clear communication and a coordinated action plan whenever developmental needs are identified. This would help ensure children and families receive timely support rather than being passed between services.

Parents must be fully included in the process and treated as partners rather than made to feel blamed for their child's development or behaviour. Families shared concerns that parenting courses are sometimes used in a way that feels judgemental rather than supportive.

When designing our local neurodevelopmental pathway, it became evident that many parents did not have enough information about typical child development, which could delay identification of needs compounded by a feeling they would be judged as 'bad parents'. Providing accessible information, guidance and supportive early intervention for families would help parents recognise developmental differences earlier and feel more confident seeking support.

A more joined-up, supportive and non-judgemental approach across health and early years services would improve early identification and ensure children receive help more quickly.



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### Q11 - What should the top three priority areas be for building and sharing evidence within the National Inclusion Standards?

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

1. **Accessible and practical strategies for educators**

Evidence and guidance must be easy for teachers and staff to use in practice. Long documents often remain unused, so there should be a focus on clear, practical and accessible strategies that can be implemented easily within classrooms and everyday practice.

2. **Accessible information and consistency for families**

The standards should also be accessible to families so that approaches used in school can be understood and supported at home. Strong partnership working and shared understanding between schools and families are essential for consistent support for children and young people.

3. **Strengths-based and individualised approaches**

The standards must recognise the uniqueness of every child and promote strengths-based approaches rather than focusing on "fixing" children. Children and young people with SEND need support to thrive, develop confidence and achieve their potential in ways that reflect their individual strengths, needs and identities.

### Q12 - What are the most important issues for national training to cover, to help support children and young people with SEND?

Parents felt the most important issues for national training to cover include demand avoidance, masking and understanding the different ways children and young people may present their needs. Training should help professionals recognise that some children's difficulties may be hidden or misunderstood, leading to unmet needs and inappropriate responses.

There should also be a strong focus on working effectively with parent carers and recognising their expertise in understanding their child's needs. Families should be treated as equal partners, with training helping staff build positive, collaborative relationships rather than creating conflict or blame.



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Training should include all staff within a setting, not just SEND specialists, to ensure inclusive practice is embedded throughout the whole environment. Joint training sessions involving both professionals and parents would also help develop shared understanding, improve communication and strengthen partnership working.

There should also be training on strengths-based approaches, ensuring children and young people are recognised for their individuality, abilities and potential rather than being viewed purely through a deficit model.

### Q13 - What practical actions can help teachers, educators and leaders manage workload whilst implementing these changes?

Good communication and partnership working with parent carers can help reduce workload for teachers, educators and leaders. When parents feel ignored or excluded, this can lead to frustration, increased conflict and more time spent managing concerns. Positive relationships with families also enable parents to better support their children at home, creating greater consistency and reducing pressure on staff.

Regular opportunities for peer support, collaboration and the involvement of parents in developing school policies, as evidenced through programmes such as PINS, can also help build more inclusive and effective practice across settings.

There also needs to be a reduction in the focus on formal assessment and performance measures such as SATs and Progress 8. Teachers already understand the levels children are working at, and the constant pressure of accountability measures increases workload while limiting flexibility to meet children's individual needs.

Many families and professionals feel the curriculum requires significant reform so that learning focuses more on children's interests, strengths and individuality, rather than expecting all children to fit into a single model. A more flexible, strengths-based approach would support both staff wellbeing and better outcomes for children and young people.



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### Q14 - How should the Special Educational Needs Coordinator (SENCO) role evolve to better meet the needs of children and young people with SEND?

Parent carers were clear that the SENCO role needs to be properly resourced if it is to meet the growing needs of children and young people with SEND effectively. Where SENCOs are also required to undertake teaching or other competing roles, this significantly limits their capacity to carry out the strategic and coordinating aspects of the role, and this does not work in practice.

The SENCO should be a protected and recognised leadership role, and must be part of the Senior Leadership Team in all settings rather than this being optional. With the increased demands expected through SEND reform, there is also a strong case for larger settings to have dedicated assistant SENCO roles to ensure the workload is manageable and children's needs are met effectively.

Families consistently reported concern about the pressure SENCOs are under, but also highlighted that a strong SENCO can be life changing for children and families. This reinforces the importance of protecting and valuing this specialist workforce.

There also needs to be a stronger focus on ongoing professional development for SENCOs beyond the initial qualification. This training and development should be completed before taking up the role and continue throughout their career to ensure they are fully equipped to lead SEND provision effectively in a changing system.

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

Families would have greater assurance that an Individual Support Plan (ISP) is high-quality if it is clearly based on the child's individual needs and strengths, genuinely co-produced with parents and carers, and consistently used in practice rather than treated as a tick-box exercise.



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There needs to be strong accountability around ISPs, including clear national standards on what “good” looks like, not just whether they are in place. Families expressed concern that relying on inspection frameworks such as Ofsted alone is not sufficient, as this does not go far enough in assessing the quality, appropriateness, or impact of ISPs, or whether the right children are receiving them.

Crucially, ISPs must be based on the child's needs rather than a standardised template or form-filling exercise. A one-size-fits-all approach risks reducing the plan to a procedural document rather than a meaningful support tool tailored to the individual child.

There is also significant concern about the lack of legal accountability attached to ISPs, particularly given the perceived direction of travel towards fewer EHCPs and greater reliance on ISPs instead of, or alongside, statutory plans. Families are worried this could weaken children's rights and reduce access to enforceable support.

Clearer safeguards, stronger quality assurance, and meaningful co-production with families would be essential to build trust that ISPs are robust, consistent, and truly meet children's needs.

### Q16 - How can we ensure Individual Support Plans are clear, concise and practical for professionals to use?

See answer 15

Individual Support Plans (ISPs) will only be clear, concise and practical for professionals to use if they are rooted in the child's individual needs and strengths, rather than becoming a generic or tick-box template. A one-size-fits-all approach risks making plans less meaningful and less usable in real practice.

To support clarity and usability, ISPs should be co-produced with families and professionals, ensuring the information included is relevant, focused and directly linked to day-to-day support for the child. This would help avoid unnecessary detail and ensure the plan remains a practical working document rather than a procedural exercise.



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There also needs to be consistency in structure and expectations nationally so that professionals know what “good” looks like, while still allowing flexibility to reflect individual need. Without this, there is a risk of variability in quality and usefulness across settings.

Importantly, ISPs must not become a replacement for legally robust, enforceable support without adequate safeguards. Families have raised significant concerns that ISPs currently have no legal duty for the provision within them to be delivered. This lack of enforceability is causing anxiety, particularly in the context of a potential shift away from EHCPs towards ISPs, as it could weaken children’s rights and reduce accountability for ensuring support is actually provided.

When designed well, ISPs should be short, accessible, regularly updated, and focused on clear actions, responsibilities and outcomes that professionals can realistically implement in everyday practice.

### Q 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?

Transitions for young people with SEND will be most effective when they are started much earlier, rather than being left until just before a transition point. Early planning allows time for needs, aspirations and support to be properly understood and put in place.

Families consistently report that smooth transitions, which are well planned and shaped around the young person, are essential for successful moves into post-16 provision, further education, training or employment.

There also needs to be a more joined-up and consistent approach across education, employment and support systems. At present, post-16 pathways such as internships and supported employment can involve burdensome processes that discourage participation.

The shift in support between school, college and higher education can be significant, and this needs to be addressed to ensure a more gradual, supported transition rather than a sudden change in expectations and provision.



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In addition, changes to Access to Work have impacted young people's ability to follow intended pathways locally. Families feel that government initiatives are not always aligned, highlighting the need for stronger coordination and a truly joined-up approach across services to support successful long-term outcomes.

### Q 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?

To make Inclusion Bases effective, there must be a strong, well-resourced capital programme to ensure they are properly designed, built and equipped to a high standard. This cannot be a one-off investment; it must be sustained ongoing funding to cover maintenance, development and the ability to adapt provision as local needs change over time.

Crucially, Inclusion Bases must be staffed by highly skilled, well-trained professionals with the expertise to meet a wide range of complex needs. Without this combination of proper resourcing, sustained investment and skilled staffing, Inclusion Bases risk failing to deliver genuine inclusion or the flexibility required to meet the diverse needs of children and young people.

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

This question and the SEND reforms are based on the narrative that one type of provision is better than another, but parents know this is not correct and that children's needs can only be met through the right setting and right support at the right time for each individual child.

We need a change of narrative which focuses on matching provision to the child, rather than comparing or ranking different types of settings. Inclusion Bases will be right for some children, but they must not become places where children are placed and then effectively forgotten or separated from the wider school community.

There must be a strong expectation that children remain valued members of their school, with a clear focus on belonging and inclusion across the whole setting. Experience, such as in Somerset, shows that Inclusion Bases only work where there is sustained investment in inclusive culture across the entire school, not just within a designated space.



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Staff must also have the correct level of training to confidently meet a wide range of needs, including neurodiversity, communication differences and social, emotional and mental health needs. Without this, Inclusion Bases risk becoming isolated provision rather than part of a genuinely inclusive whole-school approach.

Ultimately, ensuring every area can meet the full range of needs depends on strong leadership, well-trained staff, and a system that prioritises the individual needs of children rather than fitting them into predetermined models of provision.

Q 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?

Parents felt that the Experts at Hand offer could be a very positive initiative and valued the intent behind it, particularly the idea of providing quicker access to specialist support for children and young people in mainstream settings. However, there were significant concerns about how it will work in practice, particularly around the availability of key professionals such as Educational Psychologists, Speech and Language Therapists and Occupational Therapists.

There is also concern that national guidance has not yet been published, while local areas are already trying to design and implement the model without a clear framework. In addition, there appears to be limited reference to social care within the current information, raising questions about how fully integrated the offer will be across education, health and care.

Strong joint governance between local area partners will be essential to make this effective, with clear shared accountability across education, health and social care. Targets should focus on impact for children and young people rather than activity alone, and be informed by lived experience.

Robust systems are also needed to ensure the offer is not only accessed by proactive settings, but also reaches those where parents are raising concerns about inclusive practice, so that support is targeted where it is most needed.



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### Q 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?

The current system, including the EHCP process, is already leading to delays for children with highly complex, low incidence needs accessing appropriate specialist support within a suitable timescale. With the majority of local authorities not meeting the 20-week EHCP deadline, these delays are compounded further. Given government expectations that EHCP requests will continue to increase over the next five years, there is a clear risk that the situation will worsen without system change.

Timely access to high-quality professional assessments must be prioritised to ensure children's needs are accurately identified as early as possible and that decisions are based on robust evidence. Without this, children risk remaining in unsuitable provision for longer than necessary.

There also needs to be a genuinely joined-up approach across education, health and social care, working in a person-centred way that keeps the child's needs, outcomes and lived experience at the heart of decision-making. This coordinated approach is essential to ensure support is not fragmented or delayed between services.

In addition, consideration should be given to establishing an independent panel to support earlier decision-making around specialist placements. This could help reduce delay, improve consistency across areas, and ensure children with the most complex needs can access the right provision without unnecessary waiting.

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

Lack of clarity on how EHCPs, ISPs and Specialist Provision Packages will work together has caused significant anxiety for families. Parents expressed concerns about who would decide on access to these packages, how consistency would be ensured, and how they would interact with existing legal frameworks.



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There are also serious concerns about legal rights and enforceability, particularly whether provision within Specialist Provision Packages would be delivered and what recourse families would have if it is not. Without clear safeguards, there is a risk of reduced accountability compared to current arrangements.

Parents are worried that children could be required to fit a predetermined model of support, rather than provision being designed around individual needs and strengths. This risks oversimplifying complexity and increasing the likelihood of children falling through gaps in provision.

To be effective, Specialist Provision Packages must be flexible, clearly defined, and co-produced with families and professionals, ensuring they can meet a wide range of needs. They must also provide assurance that provision is needs-led, legally clear, and adaptable so that no child is left without appropriate support due to system boundaries or categorisation.

[Q 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?](#)

While the idea of EHCPs guaranteeing educational provision through a Specialist Provision Package, with day-to-day detail captured in Individual Support Plans (ISPs), was seen as potentially helpful in making plans more responsive, families raised significant concerns about how this would work in practice.

Although ISPs being more regularly updated could make them more responsive to a child's changing needs, there is concern that current systems already struggle with consistent annual EHCP reviews, and that expectations for review and oversight of ISPs may not be reliably met.

A key issue is that ISPs would need to have clear legal enforceability. Without this, there is significant concern that provision set out within them may not be delivered, leaving children without the support they are entitled to. Families strongly emphasised that accountability and enforcement mechanisms are essential.



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ISPs must also be co-produced with experienced staff who have a detailed understanding of the child, working closely with the child and their family. Without this level of expertise and collaboration, there is a risk that plans become generic or disconnected from real need.

Overall, families are concerned that having ISPs without clear accountability and enforceable delivery of provision would weaken existing protections and reduce confidence in the system.

**Q 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?**

This needs to start with listening to families and ensuring their concerns are taken seriously from the outset, rather than being dismissed or delayed. A truly joined-up approach across education, health and social care will be central to making this work effectively. Parents often have to repeat their story multiple times to different professionals, and for families of children with complex needs this adds unnecessary stress at an already difficult time.

To make a direct route work in practice, there must be strong multi-agency coordination so information is shared once and used across all services, reducing duplication and delay. Early identification and timely access to assessments should be prioritised to ensure children are supported as early as possible.

There is also a clear need for improved resourcing and training within early years. Practitioners must be properly upskilled and their role in identifying and supporting complex needs must be fully recognised and valued.

Specialist early years settings also need to be appropriately resourced, and effective practice models such as Dingley's Promise should be built on and expanded to ensure high-quality, inclusive early support is consistently available.



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

Needs assessments should begin by listening to the child and their family to understand their strengths, needs and lived experience, ensuring a holistic, child-centred approach in line with the SEND Regulations and the SEND Code of Practice.

They should build on existing evidence from education, health and other professionals involved with the child to create a full picture of need.

There are concerns that some local authorities do not consistently consider private reports, which is not in line with the SEND Regulations and Code of Practice. Clearer guidance is needed to ensure high-quality external assessments, including from private Educational Psychologists, are properly considered.

Educational Psychologists are highly valued by families and should remain central to the assessment process. Overall, assessments must bring together professional and family evidence to ensure robust, evidence-based decision-making.

### Q 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?

There are a range of factors that LAs need to take into account when proposing potential settings, but the most important must be what will ensure positive outcomes for the child, based on their individual needs and strengths.

A key consideration should be whether the child will have a suitable peer group that supports their sense of belonging, inclusion and wellbeing.

Admission arrangements and the provision available in each setting must be clearly and transparently communicated to families, as parents currently spend significant time and energy trying to understand what different settings can actually offer.



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Distance and travel arrangements must also be considered, as excessive travel can be tiring for children with SEND and can negatively impact their experience and engagement. At present, the separation between placement decisions and transport responsibilities under different legislation can create additional complexity, delay and conflict, with families often caught in budget disputes rather than being supported to access the right provision.

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

Parents need honest, transparent information about what each setting can and cannot provide, including staff expertise, qualifications, and the range of support and enrichment experiences available.

Families should be able to visit settings more than once before making a decision, to fully understand the environment. This could be supported through structured open days, guided visits, or group tours that allow time to explore provision properly.

It is also valuable for parents to speak directly with other families already attending the setting, as this provides real insight into how support works in practice.

The independent choice adviser role is also highly valued locally, as it helps parents navigate options, prepare questions, and feel more confident in making informed decisions about the most appropriate setting for their child.

### Q 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.

Families have told us there is no single "right" maximum length of time for a temporary placement in Alternative Provision, as it must depend on the individual needs of the child and the circumstances that led to the placement.

Children are often placed in AP because their current provision is not meeting their needs. A premature return, without the underlying issues being properly addressed, is likely to lead to further breakdowns in placement and repeated disruption for the child.



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Instead, the focus should be on ensuring the placement is outcome-driven, with regular review based on the child's progress and needs, rather than a fixed timescale. Transition back to mainstream should be carefully planned and well supported, including opportunities for staff from the home school to engage with the child in AP to rebuild relationships and support a gradual reintegration.

There should also be strong quality assurance of AP through a clear framework to ensure provision is safe, well-managed, and effectively meeting the child's needs and outcomes. Schools should also be rewarded and supported for developing their own in-house Alternative Provision, where appropriate, as this can strengthen inclusion, improve continuity for pupils, and reduce the need for external placements.

**Q 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.**

Families understand the need for financial management of budgets, but there are significant concerns that these proposed changes could unintentionally reduce the number of available specialist placements.

There is worry that if independent special schools are reduced or close, there will not be enough capacity to meet existing demand, particularly when the system is already experiencing a shortage of suitable places. Families are especially concerned that ISS settings are often the only providers able or willing to take children with the most complex needs, so any reduction in provision could leave some children without appropriate placement.

While cost is an important consideration, families strongly feel that the focus must remain on quality of outcomes rather than price alone. Placements need to be judged on how well they meet children's needs, support progress, and improve long-term life chances.

Without careful planning and safeguarding of capacity, there is a risk that changes could limit choice and reduce access to specialist provision at the very time demand is increasing.



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

Parents are very concerned about accountability, and there is a perception that the current direction risks schools effectively monitoring themselves. Ofsted inspections are not frequent enough to provide robust, ongoing accountability for how Inclusive Mainstream funding is used in practice.

There is also a structural issue in the system, where local authorities retain responsibility for ensuring provision but do not always have sufficient authority over academies, creating inconsistency in oversight and accountability.

Families have therefore called for stronger safeguards, including clearer and more transparent reporting on how Inclusive Mainstream funding is spent and the impact it is having on children's outcomes. There is also a strong view that SEND funding should be ringfenced, with a dedicated budget line that is protected and clearly linked to SEND provision within settings.

Some parents have also suggested that SENCOs, as part of their strategic leadership role, could have greater oversight of SEND funding within schools to ensure it is used directly to support children's needs, rather than being absorbed into wider school budgets.

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

Parents welcome the idea of SEND funding sitting more directly within mainstream budgets, provided there is sufficient scrutiny, transparency and accountability over how it is used to support children and young people with SEND.

However, there is a significant concern about fairness and equity in the current system. Schools that are more inclusive often end up supporting a higher proportion of children with SEND, but the notional SEND budget does not always reflect this level of need. At the same time, other schools that are less inclusive may retain similar levels of funding despite not taking or supporting the same number of children.



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This creates a sense of unfairness and an unsustainable system, where funding does not consistently follow need. Families therefore feel that any move towards more funding within mainstream budgets must be accompanied by strong accountability measures and a mechanism to ensure funding is fairly distributed in line with the level of need and inclusivity within each school.

**Q 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?**

Families gave a mixed response. While there was some understanding that this approach could be a practical way of managing funding and supporting collaboration between schools, significant questions were raised about equity and how funding would be fairly allocated in practice.

There are local concerns based on existing pooled arrangements, such as PFSA resources being shared across schools, where some settings appear to receive a greater share than others. This has led to perceptions of unfairness and raises concerns about how consistently and transparently pooled funding would be distributed under a wider SEND group model.

There is also concern about how this approach would work in rural areas, where there are many small schools. Families worry that smaller schools could be overshadowed or “swallowed up” by larger schools within trusts or groups, potentially reducing their voice and access to resources.

For pooled funding to work effectively, there would need to be clear governance, transparent allocation criteria, and safeguards to ensure fair distribution, particularly in rural and mixed-size localities.

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

Disagreements about membership, provision, or funding in groups of schools for SEND should be resolved through clear, transparent governance structures with strong SEND partnership arrangements and accountability, ensuring all schools involved are fairly represented, including smaller rural schools that may otherwise risk being overshadowed by larger settings.



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There should also be an independent element to dispute resolution where disagreements cannot be resolved at group level, to ensure fairness and prevent conflicts of interest within the group.

Ultimately, resolution processes must be focused on ensuring fair access to provision, transparency in decision-making, and equity across all schools, with strong SEND partnership arrangements ensuring the child's needs remain central rather than organisational or financial pressures.

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

These groups will only be effective if there is strong, shared partnership decision-making, rather than reliance on individual senior leaders. Clear governance and collective responsibility will be essential to ensure consistency, fairness and accountability across all schools involved.

They also need to be fully joined up with the wider SEND system, including Family Hubs and the Experts at Hand offer, so that support is coordinated rather than fragmented. This would help ensure that schools are not working in isolation and that families experience a coherent system of support.

A key purpose of these groups should be to share good practice and strengthen inclusion across all settings. This includes learning from what works well, reducing variability in practice, and ensuring that inclusive approaches are consistently embedded so that all children and young people can access high-quality support regardless of where they live or attend school.

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

The experiences of children, young people and their families must be central to local partnership groups, so that decisions are grounded in real lived experience and reflect local needs. Genuine co-production should be a core principle, not a tick-box exercise or an after thought, ensuring that families are meaningfully involved in shaping provision and decision-making.

Representation is also essential across education, health and social care, including SENCOs and SEND leads, to ensure a fully joined-up, multi-agency approach to supporting children and young people with SEND.



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Local SENDIAS services should also be key stakeholders, as they help ensure parental confidence in the process, provide independent advice and support, and keep the focus on children and young people remaining at the centre of decision-making.

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

Stronger collaboration and a culture of improvement through local SEND strategic plans can be built by embedding genuine co-production at the heart of all decision-making. The experiences of children, young people and their families must be central, ensuring plans are shaped by lived experience rather than being developed in isolation or treated as a tick-box exercise.

Strategic plans should actively bring together education, health and social care partners in a shared approach, with clear accountability for delivering agreed outcomes. This would help reduce fragmentation and ensure a more consistent response to local need.

SENDIAS services and Parent Carer Forums (PCFs) should both play a central role in shaping, reviewing and challenging strategic plans. SENDIAS provides independent advice and support to families, helping ensure transparency and safeguarding rights, while PCFs bring the collective voice of parent carers to co-production and service design. Together, they help ensure that lived experience informs decision-making and builds trust in the system.

Overall, a strong culture of collaboration will come from shared ownership of outcomes, meaningful partnership with families through SENDIAS and PCFs, and a consistent focus on improving inclusion and outcomes for children and young people.

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

Children, young people and their families need clear, accessible and consistent information, advice and guidance to ensure greater fairness across the SEND system.



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This should include honest, easy-to-understand information about what different types of provision can and cannot offer, as well as how decisions are made and what rights families have within the system. Clear guidance is essential to reduce confusion and ensure families are not left to navigate complex processes on their own.

Independent advice and support through SENDIAS services should remain a key part of this, helping families understand their options, their rights and how to challenge decisions where necessary. Parent Carer Forums (PCFs) also play an important role in sharing lived experience, identifying gaps in provision and helping shape local systems so they are more consistent and fair.

There also needs to be strong quality assurance in place, as parent carers have reported being charged for incorrect or misleading information. This needs to be properly regulated to ensure families can trust the advice and guidance they receive, regardless of where it comes from.

Information should be available in accessible formats and provided early, not only at crisis points, so that families can make informed decisions and understand support pathways from the outset. Consistency across areas is also important to reduce the current variability in experience and help ensure fairness regardless of where a child lives.

**Q 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.

Yes, but only if it strengthens both expertise and trust in the process.

A SEND specialist such as a SENCO can bring valuable professional knowledge and understanding of SEND provision, which can help ensure complaints are properly informed and considered in context. This can improve the quality of discussion and help panels make more balanced and evidence-based decisions.



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To strengthen independence further, a SENCO could sit on panels in other schools through reciprocal arrangements. This would provide external perspective, reduce perceptions of bias, and help build consistency and shared understanding across settings while maintaining professional SEND expertise within the process.

Where appropriately balanced, having SEND expertise involved alongside independent members can strengthen outcomes, ensure better understanding of children's needs, and support more constructive resolution of concerns.

## Conclusion

These key recommendations have come out strongly through the voices of local families.

### 1. **Strengthen genuine co-production with families**

Children, young people and parent carers must be equal partners in decision-making, with lived experience fully embedded in system design, delivery and review rather than being treated as a consultation exercise.

### 2. **Improve accountability, transparency and funding fairness**

SEND funding should be ringfenced, with stronger external accountability and transparent reporting to ensure resources are fairly distributed and that inclusive schools are properly supported in line with levels of need.

### 3. **Guarantee timely, joined-up multi-agency support**

There needs to be stronger coordination across education, health and social care, with clear governance arrangements, earlier intervention, and reduced delays in assessment and access to specialist support.

### 4. **Ensure enforceable, needs-led support in all plans**

EHCPs, ISPs and Specialist Provision Packages must be clearly based on individual need, co-produced with families, and include enforceable accountability so that agreed provision is consistently delivered.

### 5. **Invest in inclusive practice, workforce and early support**

There should be sustained investment in workforce training, SENCO leadership, and specialist services such as Educational Psychologists, Speech and Language Therapists and Occupational Therapists, alongside a stronger focus on early identification and intervention before needs escalate.