



Fixing a Broken System

*How England's Education Reforms Connect and
What They Mean for Children with SEND*

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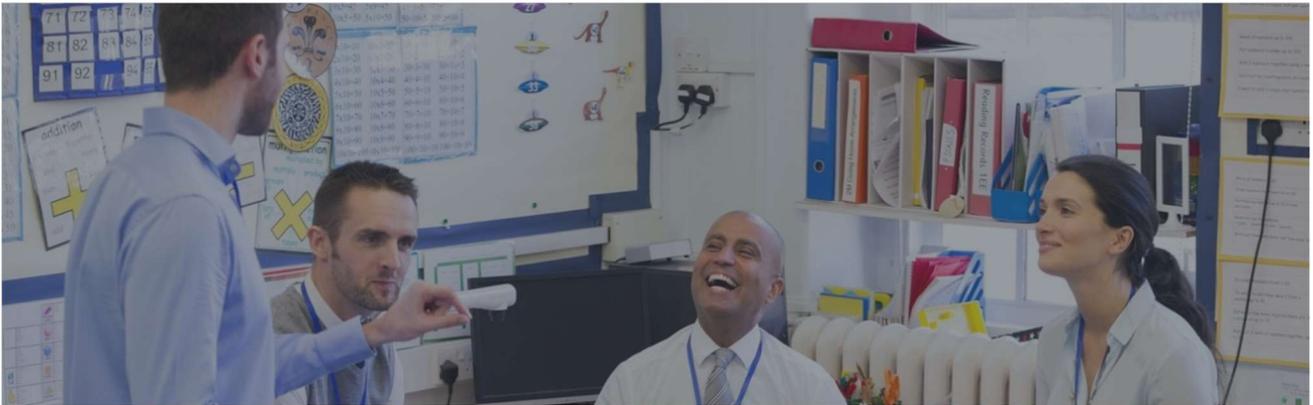


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1. Introduction: The Bigger Picture

In the space of just a few months, the education landscape in England has shifted more dramatically than at any point in the last decade. A brand-new Ofsted Inspection Framework. A Curriculum and Assessment Review Final Report. A Schools White Paper. A SEND Reform consultation. The Children's Commissioner's Childhood Plan. The Education Committee's Solving the SEND Crisis report. Each has generated its own headlines, its own debates, its own wave of reaction on social media.

Most commentary treats these documents in isolation. People respond to the SEND reform without fully reading and understanding the White Paper or adding the context of Curriculum and Assessment Review. They critique the Curriculum and Assessment Review without connecting it to the Ofsted framework. They engage with the specialist provision packages without understanding the funding context. And in doing so, they miss the most significant thing about what this Government is attempting: these documents are not separate initiatives. They are connected parts of a single, coherent reform programme, the first genuinely joined-up attempt in a generation to fix a system that everyone acknowledges is broken.

In this document I argue that you cannot understand any one of these reforms without understanding all of them. The Ofsted framework creates the accountability that makes schools change their practice. The Curriculum and Assessment Review creates the space in the curriculum for that change to happen. The White Paper restructures how schools are organised and supported. The SEND reform redesigns how children's needs are identified and met. Pull any one of those threads out and the fabric unravels.

I write this as someone who has spent 25 years working with schools across the UK, seeing the SEND system from every angle. I am the Managing Director of B Squared, a company that provides assessment software and professional development for schools supporting pupils with SEND. I am the host of The SENDcast, now with over 290 episodes and more than 500,000 downloads, where I have spoken to hundreds of practitioners, leaders, parents, and policy makers about what works and what doesn't. I am also neurodivergent myself, diagnosed with autism and ADHD as an adult, and the father of two neurodivergent daughters who I have supported through a system that was not designed for them.

I try to approach these reforms with empathy for everyone involved. The Government is trying to fix a system that has been failing for years, under enormous financial pressure, with every decision scrutinised before the detail is even published. Schools are exhausted, under-resourced, and being asked to change while still delivering for the children in front of them. Parents, particularly those whose children have already been failed, are terrified that reform means losing the protections they fought years to secure. Everyone has legitimate concerns. Everyone is acting from their own experience of a system that has let them down in different ways.

What follows is my attempt to step back from the individual documents and see the whole picture: how we got here, what the Government is trying to achieve, how the reforms connect, what's still missing, and what schools can do right now without waiting for implementation dates that may be years away.

TL;DR 1. Introduction — The Bigger Picture

Most people are reacting to these reforms in isolation. They are not separate initiatives — they are connected parts of the first genuinely joined-up reform programme in a generation. You cannot understand any one of them without understanding all of them.

2. The System Today: A Crisis in Numbers

Before examining what went wrong and what the reforms propose, it is worth pausing on the scale of the crisis. These are not abstract policy problems. They represent hundreds of thousands of children and families living inside a system that is consuming billions of pounds while failing the people it exists to serve.

638,700

Active EHCPs as at January 2025 - up 10.8% on the previous year

£2 Billion

Spent by local authorities on SEND transport in 2024/25 - up 204% since 2015/16

21,000

SEND tribunal appeals registered in 2023/24 - a 55% annual increase

99%

Of tribunal cases decided in favour of families - LAs win barely 1%

£200–350 Million

Estimated annual public spending on SEND legal disputes

46.4%

Of new EHCPs issued within the 20-week statutory timeframe in 2024

The collective high-needs deficit across local authorities has reached crisis point. The Office for Budget Responsibility projected it could reach £14 billion by 2028. The County Councils Network put the figure at £6.6 billion by the end of March 2026. Eight in ten English councils warned of insolvency if required to honour their accumulated SEND deficits in full. In response, the Government announced it would write off 90% of historic deficits, a £5 billion intervention, subject to local reform plans. The statutory override

allowing councils to keep these deficits off their balance sheets was due to expire in 2028; without action, the consequences for local government finances would have been catastrophic.

A record 1.7 million pupils in England currently receive some form of SEND support in school. The number receiving the higher level of support through an Education, Health and Care Plan has more than doubled in a decade. The Government has also committed £3 billion towards creating 50,000 specialist places within mainstream schools, an acknowledgement that the current system is not only financially unsustainable but structurally unable to meet the scale of need.

The Education Committee first examined the SEND system in 2019 and found it in crisis: adversarial processes, a postcode lottery of provision, underfunding, workforce gaps, delayed EHCPs, weak accountability, and fragmented multi-agency working. In 2025, the Committee published its latest report, Solving the SEND Crisis, and found identical problems, only worse. Six years of reports, inquiries, and consultations. No meaningful change on the ground.

Reports ratify our experiences. They do not change them. The children and families living inside this system cannot wait for another inquiry cycle. What they need is action, implementation, and reform that actually reaches the classroom. This is what the current Government is attempting, and understanding how requires looking at how we arrived at this point.

TL;DR 2. The System Today

A Crisis in Numbers 638,700 active EHCPs. £2 billion on transport. 21,000 tribunal appeals. A £14 billion projected deficit. 1.7 million pupils receiving SEND support. The numbers are not abstract — they represent a system spending billions on its own failure.

3. How We Got Here: The Accumulation of Failures

The current crisis was not caused by a single decision or a single government. It is the product of a thirty-year accumulation of well-intentioned policies, chronic underfunding, fragmented accountability, perverse incentives, and a fundamental mismatch between what the system promised and what it was resourced to deliver. Every individual decision made some sense at the time. Together, they built a system that spends billions on failure while children wait years for help that should have been available on the first day they walked through the school door.

TL;DR 3. How We Got Here: The Accumulation of Failures

The crisis was not caused by one decision or one government. It is thirty years of well-intentioned policies, chronic underfunding, and perverse incentives interacting in ways nobody planned for.

3.1 The 2014 Reforms: Right Intentions, Removed Accountability

The Children and Families Act 2014 was genuinely well-intentioned. Extending support from birth to 25. Bringing education, health, and care together in a single plan. Giving children and families a stronger voice in decisions about their lives. These were the right reforms. The original proposals included meaningful accountability mechanisms to ensure the system delivered on its promises.

But accountability was stripped out as the legislation passed through Parliament. What remained was a system that massively expanded entitlement without expanding funding to match, and without the mechanisms to hold anyone responsible for delivery. The number of plans has grown from around 240,000 to over 638,000, and the money did not follow.

The design assumed that bringing health and social care into the plan would mean those services would contribute funding and professional input. They largely did not. The NHS and social care treated the 'H' and 'C' sections of EHCPs as someone else's problem. Education picked up the bill. So, from day one, the 2014 system promised more than it could deliver, and the gap between entitlement and resource has been widening ever since.

The SEND Tribunal was designed as a last-resort safeguard for families, a backstop when the system failed. Instead, it has become the standard process. Parents learned that local authorities would say no unless challenged. Local authorities learned that many parents would accept no, so it was financially rational to refuse and only concede when forced. The whole system became adversarial by design: two sides fighting over resources rather than collaborating around a child.

TL;DR 3.1 The 2014 Reforms: Right Intentions, Removed Accountability

The Children and Families Act massively expanded entitlement without expanding funding or accountability. Health and social care never contributed as intended. The gap between what was promised and what was resourced has been widening ever since

3.2 Austerity and the Dismantling of Early Intervention

The 2014 reforms launched into a landscape where local authority budgets had already been cut by roughly 40% in real terms since 2010. The early intervention services that were supposed to prevent children reaching crisis, children's centres, early years support, community health visitors, school nurses, youth services, CAMHS capacity, were all being stripped back at exactly the moment the new system needed them most.

You cannot build a system that relies on early identification and multi-agency working, then defund the agencies that were supposed to do the identifying and the working together. The result was entirely predictable: children were not identified early, their needs escalated, and by the time anyone noticed, the only option the system offered was an EHCP. Early intervention was not just reduced, it was dismantled at precisely the moment it mattered most.

It is encouraging to see children's centres returning. They were a critical part of the infrastructure that was lost, and their absence left families without support at the earliest and most important stage of their children's development.

TL;DR 3.2 Austerity and the Dismantling of Early Intervention

The early intervention services the 2014 system depended on were being stripped back at the exact moment it launched. Children were not identified early, needs escalated, and EHCPs became the only option the system offered.

3.3 Academisation and the Fracturing of Local Systems

The academisation of schools fundamentally changed the relationship between schools and local authorities. Before academies, maintained schools sat within an LA structure that, at its best, provided shared SEND support, advisory teachers, specialist outreach, educational psychologists, and behaviour support teams. Academies and trusts operate outside that structure. Some trusts built excellent SEND provision internally. Many did not. And local authorities lost the ability to coordinate, quality assure, and support schools that were no longer under their authority. Some authorities did adapt well, but many others did not.

The result was a patchwork where some schools had strong SEND practice and others had almost none, with no mechanism to ensure consistency. The same child, with the same needs, would receive entirely different levels of support depending on which school they attended. Same postcode, different headteacher, different outcome.

There is a deeper question about what academisation did to the relationship between schools and their communities. Trusts create standardised identities, schools must use correct PowerPoint colours, consistent branding, strict uniform policies and student expectations displayed at the front of every classroom. Someone put it powerfully to me on The SENDcast: "Is the school part of the community, or is it simply put in the centre of a community and the community stops when you enter the school?"

When we talk about belonging, a word that appears throughout the current reforms, this question matters. A child belongs to a community. If their school's identity is defined by a trust headquarters somewhere else, with standard fonts and standard policies and standard display boards, where is the space for the child whose needs do not fit the standard?

TL;DR 3.3 Academisation and the Fracturing of Local Systems

Academisation broke the local authority infrastructure that had coordinated SEND support. It also raised a deeper question about belonging: if a school's identity is defined by a trust elsewhere, where is the space for the child whose needs don't fit the standard?

3.4 The Assessment Catastrophe: Levels, P Levels, and “Below”

This is perhaps the least discussed and I feel the most damaging change of the past decade. It sits at the root of the EHCP crisis, the failure of the graduated response, and the inability of schools to support children with SEND effectively, yet it is rarely connected to any of those outcomes in policy discussions.

Before 2014, England had a continuous assessment framework. P Levels ran from P1 to P8, covering the earliest developmental stages through to the threshold of the National Curriculum. National Curriculum Levels then ran from Level 1 upward. Every child was somewhere on that ladder. A teacher in Year 6 would have children working at Level 2A, Level 3, Level 4, and high achievers at Level 5. They knew where each child was, what came next, and how to plan for the range in their classroom. In governor meetings, you could discuss every child's position, their progress, and their trajectory. Every child was visible.

In 2014, National Curriculum Levels were removed. The intention was to give schools freedom to develop assessment approaches that worked for them. What actually happened was chaos. Most assessment software systems replaced the granularity of Levels with simple judgement: “Above”, “Expected” or “Below.” Overnight, every child working out of year group, whether they were one month behind or five years behind, became the same word. A child in Year 6 working at what would have been Level 3 and a child in Year 6 working at what would have been P4 were both simply “Below.” All specificity gone. All ability to show progress gone. All ability to plan appropriate next steps from the data gone.

I hate the term “Below.” I have done since it was introduced. It means nothing and helps no one. It does not help a teacher understand needs or what learning outcomes are appropriate. It is a nightmare when trying to secure additional support. Where is the child working? “Below.” What does that mean? For a child in Year 6, they could be working anywhere from a developmental age of a few months to the end of Year 5. “Below” does not tell you. It essentially says: you do not matter enough for us to know where you are.

Many schools believed that P Levels were also removed at the same time as National Curriculum Levels. They were not, P Levels survived until 2018. But the widespread confusion meant schools began abandoning them early, leaving children working below the National Curriculum in a complete assessment vacuum even before the formal removal.

Then the Rochford Review (2016–2018) formally removed P Levels and introduced two replacement frameworks. The Engagement Model covers children working below approximately P4, below around 18 months of developmental age. But the Engagement Model contains no skills, no knowledge, no progression steps. It is a way of looking at engagement, not an assessment framework. Schools report how many children are on the Engagement Model when submitting SATs data. Beyond that, it provides no structure for understanding or evidencing progress. It was a tick-box exercise, something the previous Government could point to as having “done something” for the most complex pupils, while doing almost nothing.

The Pre-Key Stage Standards pick up from around a developmental stage of 18 months (approximately P4) and run up to the end of Reception for Key Stage 1 reporting, and up to the end of Year 2 for Key Stage 2 reporting. They provide key indicators across six standards at KS2 and four at KS1, but these are broad markers, not the small steps a teacher needs to plan learning or demonstrate progress over a term. Crucially, they are structured around accountability, not child development. There is more granularity at the top of the

scale where more children sit, and less granularity at the lower end where children with the most complex needs require the most carefully planned provision. The system literally provides the least detail for the children who need the most detailed assessment.

Both frameworks are designed for end-of-key-stage reporting only. The Government's own guidance tells schools to use their own more detailed assessment criteria for tracking progress within a key stage. Where are schools supposed to get these criteria? There is no national framework. There is no funded provision. Schools either pay for a supplementary assessment system or they build their own, which most do not have the expertise to do well, or they simply do not track meaningful progress for children working below age-related expectations. If you care about your SEND pupils, you pay. If you do not, you stick with "Below." It is a SEND tax.

The parallel loss of spoken language assessment has compounded the damage. P Levels included expressive and receptive language as two separate assessment areas. National Curriculum Levels defined clear expectations for Speaking and Listening. The current framework has virtually nothing below key stage expectations for spoken language. There are no Pre-Key Stage Standards for communication. For a child who is non-verbal or has significant speech and language difficulties, the national assessment framework simply does not see them. I argued for years that this would have enormous consequences. Communication and Interaction is now one of the largest and fastest-growing areas of identified need. The Curriculum and Assessment Review is urgently trying to embed oracy across the curriculum, trying to solve a problem that the assessment changes of 2014–2018 helped create by making spoken language invisible in the data.

TL;DR 3.4 The Assessment Catastrophe: Levels, P Levels, and "Below"

Removing National Curriculum Levels and P Levels destroyed the assessment framework that made every child visible. "Below" replaced granularity with a single word that tells a teacher nothing. This is a direct and underacknowledged driver of the EHCP explosion.

How "Below" Broke the Graduated Response

The damage extends far beyond assessment itself. Consider what happens in practice. A SENCO identifies a child struggling with writing. They know the child is struggling because the child cannot do what the rest of the class is doing. But they do not know what specifically the child cannot do, because their assessment data says "Below." They do not know whether the problem is fine motor control, letter formation, phonological awareness, composition, sentence structure, grammar, stamina, working memory, or the child simply not having anything they want to say.

So the SENCO goes and asks colleagues for a writing intervention. Not a writing intervention to support composition for a child working at early Year 1, but just "a writing intervention". They get twenty recommendations. They pick one. They run it for a term. It might target handwriting fluency when the actual problem is composition. It might be pitched at Year 3 expectations when the child is actually working at early Year 1. At the end of the term, the child has not made progress. Not because the intervention was bad, but because it was aimed at the wrong thing at the wrong level.

The SENCO records "intervention tried, limited progress." They try another. Same result. After two or three cycles, the school has a file showing they have "tried everything" and the child "is not responding to intervention." That file becomes the EHCP application. The narrative is: we have exhausted what we can do in school; this child needs specialist provision.

But the school has not exhausted what it can do. It never started. It never accurately assessed where the child was working. It never identified the specific barrier. It never matched the intervention to the actual need. It ran generic support at a child whose needs it did not understand, documented the failure, and used that failure as evidence for an EHCP request. The Assess, Plan, Do, Review cycle, which is supposed to be the graduated response that prevents children needing EHCPs, becomes a performative exercise. Assess: “Below.” Plan: generic intervention. Do: deliver it for a term. Review: no progress. Repeat. Refer.

Nobody in that chain is acting in bad faith. The SENCO and the teachers are all doing their best with what they have. But the system has given them no assessment framework to identify the specific need, no training to understand developmental progression below age expectations, and no funded tools to fill the gap. The assessment vacuum created by the removal of Levels and P Levels is a direct and significant driver of the explosion in EHCPs, yet it is rarely identified as such in policy discussions.

TL;DR How "Below" Broke the Graduated Response

Without knowing where a child actually is, schools run generic interventions aimed at the wrong thing at the wrong level, document the failure, and use it as evidence for an EHCP. The Assess, Plan, Do, Review cycle becomes performative. Nobody is acting in bad faith — the system has given them nothing to work with.

3.5 The Curriculum Squeeze

The 2014 Primary National Curriculum raised expectations significantly. One school I worked with as a governor calculated that Year 6 pupils were expected to be approximately nine months further ahead at the same point in time compared to the previous curriculum. Content was packed so tightly that, across key stages, there was barely time to cover the material before assessments.

I have previously compared it to running through the Natural History Museum in two hours, passing every exhibit but not having time to take anything in. If everything is essential, nothing is. A friend who teaches GCSE History finishes the course content just two weeks before the final exams. Where is the time to explore topics? Where is the time to revisit concepts with children who need longer? Where is the time to build the relationships and belonging that the reforms now recognise are essential?

The curriculum expectation framework also created a perverse dynamic. Children were not encouraged to exceed age-related expectations by moving into the next year’s content. But the framework provided nothing for children working below age-related expectations. There was a ceiling on going forward and no map going back. The system compressed everyone towards “Expected” and made anything either side of that invisible.

This compression did not just make life harder for children with SEND. It mathematically created more children who appeared to have SEND. If you raise the bar for “expected” by nine months, you create more children who are “below.” Some of those children do not have special educational needs, they have a curriculum that was not designed for them. The rising identification of SEND over the past decade cannot be fully understood without accounting for the curriculum moving further away from where many children naturally are.

TL;DR 3.5 The Curriculum Squeeze

The 2014 curriculum was packed so tightly there was no time to revisit, go deeper, or build relationships. It also mathematically created more children who appeared to have SEND by raising the bar for "expected."

3.6 The Behaviour Crisis: Accumulated Failure, Not Just COVID

Teachers across England are reporting a behaviour crisis. The figures are stark: 76% of teachers say that misbehaviour interrupts learning, and 73% report that it negatively affects their health and wellbeing. Research from NFER (2026) identifies increasingly challenging behaviour as one of the primary drivers of teacher stress, burnout, and decisions to leave the profession. The Department for Education's own national behaviour survey found that a significant amount of lesson time is lost to disruption each day. The Education Endowment Foundation estimates that 25% of teachers lose more than ten minutes out of every thirty to disruptive behaviour, time that cannot be recovered.

The dominant explanation is COVID. And COVID did have a real impact, particularly on the youngest children, during critical developmental windows, at precisely the moment they needed consistent adult relationships and structured learning. But COVID was not the origin of the crisis. It was an accelerant applied to trends that were already moving in the wrong direction.

Consider the children who are presenting with the most complex needs and most challenging behaviour in secondary schools right now. They were in early primary during the austerity years. Children's centres were closing. Health visitors were being cut. Early years support was being stripped back. The curriculum bar was rising. The assessment floor was disappearing. Diagnosis waiting lists were already years long. The safe, nurturing, well-resourced early experience that builds the foundations for learning and self-regulation, was being quietly dismantled at exactly the moment these children needed it most. Then COVID arrived on top of that accumulated disadvantage.

This is a generational problem, and it moves in waves. Each successive cohort entering secondary school reflects the conditions that existed when they were two, three, four, and five years old. The cohort currently in Year 7 and 8, the ones most visible in behaviour data right now, grew up during the years of maximum cumulative damage. The reform does not reach back and fix what they missed. What it does is change what enters the pipeline from around 2028 onwards: children's centres reopening, earlier identification, needs-led support, teachers who understand executive function rather than sanctioning it, schools that build belonging rather than manage failure. The improvement, when it comes, will be real, but it will be generational, not immediate.

The COVID narrative is politically convenient because it has a clear start date and implies the problem is temporary and external. The honest story, that a series of domestic policy decisions between 2010 and 2016 created the structural conditions for this crisis is more complicated, implicates previous governments of both parties, and requires a longer and less satisfying answer. But it is the true one. Until it is named clearly, we will keep misunderstanding both the scale of what has happened and the timeline on which it can be addressed.

TL;DR 3.6 The Behaviour Crisis: Accumulated Failure, Not Just COVID

The behaviour crisis predates COVID. Children with the most complex needs in secondary schools today were in early primary during the austerity years, when every support system was being dismantled. COVID accelerated trends that were already moving in the wrong direction. This is a generational problem, not a temporary one.

3.7 Accountability and Perverse Incentives

League tables, Progress 8, and Ofsted judgements based heavily on attainment data created environments where children with SEND were a risk to the school's numbers. Some schools did not want SEND children because they could affect results. Off-rolling, managed moves, reluctance to place children on the SEN register, telling parents "we cannot meet their needs, you should look elsewhere". All of these behaviours were rational, but unethical, responses to an accountability system that punished schools for having complex children.

The system measured what was easy to measure and ignored everything that actually mattered about whether a child was thriving. It valued attainment at age-related expectations above all else. A child who moved from a developmental age of two years to a developmental age of four years, showing extraordinary, life-changing progress, was invisible in the data. Still "Below". Still dragging down the numbers.

TL;DR 3.7 Accountability and Perverse Incentives

League tables and Progress 8 made children with SEND a risk to a school's numbers. Off-rolling and reluctance to place children on the SEN register were rational responses to an accountability system that punished schools for having complex children.

3.8 The Diagnosis-as-Gatekeeper Culture

Over the past two decades, a damaging culture has emerged where diagnosis has become the gateway to support. "Teachers are not psychologists and cannot diagnose" has become one of the most repeated phrases in SEND discourse on social media. It is technically true and completely misses the point. Nobody is asking a teacher to diagnose autism or ADHD. But a teacher who has a child in their classroom who cannot sit still, cannot filter sensory input, struggles with transitions, and melts down every afternoon does not need a clinical diagnosis to put a wobble cushion on the chair, give movement breaks, prepare them for transitions, and seat them away from the flickering light. That is not diagnosis. That is teaching.

The chain that diagnosis-as-gatekeeper creates is devastating. A parent notices their child is struggling. The school says they cannot provide specific support without a diagnosis. The parent goes to their GP. The GP refers to CAMHS or the community paediatric team. The NHS waiting list is two to four years. The parent cannot wait that long because their child is falling apart now. The parent pays privately, typically £1,000 to £2,500 for an autism assessment or £800 to £1,500 for ADHD. Then they bring the diagnosis back to school. The school puts the child on the SEN register. Then the EHCP process begins.

That entire chain, the private assessments, the EHCP application, the statutory process, potentially years of tribunal proceedings, exists because a teacher was not supported or empowered to say "this child needs a wobble cushion and movement breaks" in September of Year 3. Years of waiting. It is not the same as waiting for planning permission on an extension, they are waiting while a child is being failed. They will never get those years back.

I am not saying diagnosis has no value. My own diagnosis helped me enormously in understanding myself. But a diagnosis should be a personal journey of self-understanding, not a prerequisite for receiving support in school. The move from diagnosis-led to needs-led provision, which sits at the heart of the SEND reform, could have a transformative impact. Not having a diagnosis should never be a barrier to a child receiving the support they need.

Moving from diagnosis-led to needs led is not as simple as changing language in some reports, it is a complete change in how we think about supporting pupils with SEND. The five areas of development are not replacing a diagnosis, they sit alongside. The five areas also come before a diagnosis, not after. We offer support not because of a label they have finally been given, but because we see a need.

If a diagnosis is not needed, and we look at where support is needed, we will see terms like ASC, ADHD and dyslexia less. Not because they are replaced, but because we need to be child centred, looking at the child, not their label. What support do they need? Instead of asking which box they fit in.

On a personal level, a big problem with a diagnosis-led system, is that a child struggling with executive function, is their fault, until they get that diagnosis, after years of their parents fighting. Once the child gets their diagnosis, the school then “understands” and offers some support, but the child will still get sanctioned for things they struggle with. Until the child got that diagnosis, they are made to feel that is all their fault, they get told to “try harder” or “just get on with it” or “don’t make up excuses”. Those words have a long-term negative impact. Trust me, I know, I can still hear those words from my teachers in my head. Before a diagnosis, there is blame. Changing to a needs led approach, should mean understanding and support. For a child it should mean support, not blame and punishment, this is a huge change.

Some people have deep-rooted beliefs around behaviour and punishment. Punishments that we know, without doubt, don’t work, but we keep following the same process instead of trying to achieve real change. The need for children to conform and punishment for not following those rules. In theory, all that is needed is a simple change when something happens, before you act, just ask why? In reality, it is not that simple, it is a big cultural change that needs to happen across the whole of education that will take time.

TL;DR 3.8 The Diagnosis-as-Gatekeeper Culture

Diagnosis became the entry point to support. That created a devastating chain: child struggles, school waits for diagnosis, NHS waiting list runs years, parent pays privately, EHCP process begins. None of that was necessary. Moving to needs-led provision is the right direction — but it is a complete cultural change, not just a language change.

3.9 The Tribunal Arms Race and the Independent Sector

The tribunal was designed as a last-resort safeguard. It became the standard process. And it is important to say clearly: SEND lawyers and independent special schools exist because families needed them. When the system fails a child, parents do whatever they can to get help. They seek legal representation because they have been told no, repeatedly. They look at independent special schools because their local provision did not work. That is not cynicism, that is love. The lawyers, the schools, the entire ecosystem that has grown around the system, they are symptoms of a broken system, not its cause.

Local authorities concede or lose the large majority of tribunal appeals that are registered, with the vast majority of cases that reach a formal hearing decided in the family's favour. Yet the system continues to spend hundreds of millions of pounds on this adversarial process. Money that could have been spent on the provision that would have prevented the dispute in the first place. The Pro Bono Economics report estimated that the public money absorbed by the tribunal process in a single year was equivalent to nearly 10,000 places at SEN units within mainstream schools. That is not an argument for removing tribunal rights, those rights exist because families need them. It is an argument for building a system where fewer families have to use them.

The independent special school sector has grown to fill a genuine gap. Many independent special schools provide excellent, specialist education for children with the most complex needs, education that simply did not exist in the maintained sector. The families who fought to access those schools did so because they believed it was the best option for their child. That belief is often correct, and the dedication of staff in many of those settings is real.

The question is whether the market dynamics that have developed around that sector are always in children's interests. Thirty percent of independent special schools are now owned by private equity firms. That raises legitimate questions: Does the profit motive align with the educational motive? Is the incentive to demonstrate progress consistent with a funding model that may reward ongoing need? I have had personal conversations through my work that gave me pause, headteachers navigating real tensions between commercial expectations and their children's best interests. I raise these as questions, not accusations. I am not questioning the dedication of the staff within the schools, it is the organisations above I am questioning. But they are questions the system needs to answer.

There are also questions about how parental preference is shaped. Independent special schools attend events like the Autism Show and ADHD Show, presenting their provision directly to parents who are, understandably, looking for answers. When a parent then expresses a preference for a school they encountered this way, and the local authority is obliged to fund the placement, it is worth asking whether the system is working as intended.

I am not suggesting that independent special schools should be removed from the system, they are needed. For many children, they provide exactly the right provision. What the system needs is transparency, accountability, and quality assurance, applied consistently across all provision, regardless of whether it is maintained or independent, for-profit or charitable. The goal is not to penalise independent schools that do excellent work with the most complex children. It is to ensure that public money, money that belongs to children, is spent in children's interests, whoever is delivering the provision.

Is the lack of new maintained special schools down to academisation? Yes, I think it is a big factor. Local authorities cannot open new schools. The authority identifies need and applies for funding. If approved, the school will open as a free school, but it must be run by an academy trust. They need a trust to volunteer to run the school, but many trusts don't want to run special schools due to the complexity and costs. If the Government wants to reduce the number of independent special schools, they need to make the process of opening a special school easier and attract trusts to run them.

The Government cannot target and attack independent special schools, when there is no alternative to the problem the previous Government created.

TL;DR 3.9 The Tribunal Arms Race and the Independent Sector

The tribunal became the standard process rather than a last resort. Independent special schools grew to fill a genuine gap the maintained sector could not provide. Both are symptoms of a broken system, not its cause. The independent sector raises legitimate questions — particularly around private equity ownership — but the solution is transparency and accountability, not removal.

3.10 Health Withdrawal and System Fragmentation

CAMHS waiting lists are measured in years. Community paediatric referrals stretch to similar timescales. Speech and language therapy, occupational therapy, and other services have been cut or restructured repeatedly. Schools and parents cannot access the professional input children need, so unmet health needs become education's problem. A child with untreated anxiety becomes a school attendance problem. A child with undiagnosed speech and language difficulties becomes a behaviour problem. A child with unmet sensory needs becomes an exclusion. Education has been left holding the consequences of health system failure, without the tools or funding to address root causes.

Nobody owns the whole system. Education sits with the Department for Education. Health sits with the Department of Health and Social Care and NHS England. Social care sits with local authorities under MHCLG oversight. Funding comes from different pots with different rules and different accountability structures. The "joint" in joint commissioning has been aspirational at best. In most areas, the multi-agency working that the 2014 Act depended on simply did not happen because there was no single point of accountability. A child could fall between education, health, and social care, with each agency pointing at the others while nobody actually helped the child.

TL;DR 3.10 Health Withdrawal and System Fragmentation

CAMHS waiting lists run to years. Speech and language therapy, OT, and community paediatrics have been cut repeatedly. Education has been left holding the consequences of health system failure without the tools or funding to address root causes. Nobody owns the whole system.

3.11 Media, Social Media, and the Amplification of Anger

Overlaying all of these systemic failures is a media and social media environment that amplifies anger, rewards the fastest and most extreme reactions, and punishes nuance. A news article about the Government stripping support from vulnerable children gets more clicks than a balanced analysis of the trade-offs in a consultation document. Social media platforms reward engagement, and anger drives engagement. The more people who are upset, the more links are clicked, the more advertising revenue is generated.

The result is that the most thoughtful voices, the people trying to understand the intention behind a policy before reacting, trying to see the problem from multiple perspectives, are drowned out by those who have already decided it is a disaster before reading the document. Nuance does not get followers. This makes the Government's job harder, makes parents more frightened than they need to be, makes teachers feel attacked from every side and makes productive dialogue about genuinely difficult trade-offs almost impossible.

TL;DR 3.11 Media, Social Media, and the Amplification of Anger

The media environment rewards anger and punishes nuance. The most thoughtful voices are drowned out. This makes the Government's job harder, parents more frightened, and productive dialogue about genuinely difficult trade-offs almost impossible.

3.12 Not One Big Failure, Lots of Failures

What got us here is not one catastrophic decision. It is a thirty-year accumulation of changes that each made some sense in isolation but interacted in ways nobody planned for. The 2014 reforms expanded entitlement without funding. Austerity removed early intervention. Academisation fragmented local systems. The removal of Levels and P Levels destroyed the assessment foundation. The curriculum was packed too tightly. Accountability incentivised exclusion. Diagnosis became a gatekeeper. The tribunal became the norm. Health withdrew. And media amplified every failure while making constructive response harder.

Every one of these changes impacted the others, creating cascading effects that no single policy could address. This is precisely why the current Government's joined-up approach matters so much, and why understanding the connections between the reform documents is essential to understanding whether they can succeed.

TL;DR 3.12 Not One Big Failure — Lots of Failures

Every one of the changes described above impacted the others. This is precisely why a joined-up response is necessary, and why understanding the connections between the reform documents matters.

4. What the Government Is Trying to Do: The Connected Reform Programme

For the first time in a generation, a government is attempting to move all the pieces simultaneously. Not a SEND review in isolation. Not a curriculum reform without considering accountability. Not an inspection framework disconnected from what schools are being asked to do. The Ofsted framework, the Curriculum and Assessment Review, the Schools White Paper, and the SEND Reform consultation are being developed in parallel, by teams that are talking to each other, aiming at the same vision of what a school should look like and what a child's experience should feel like.

Whether they succeed is an open question. But the attempt itself is significant, because it acknowledges something that previous governments refused to accept: you cannot fix SEND without fixing the curriculum, the accountability system, school structures, and inspection simultaneously. They are all part of the same system, and changing one without changing the others simply moves the pressure somewhere else.

TL;DR 4. What the Government Is Trying to Do: The Connected Reform Programme

For the first time in a generation, a government is moving all the pieces simultaneously. Whether it succeeds is an open question. But the attempt itself is significant.

4.1 The Ofsted Inspection Framework: The Enforcement Mechanism

Of all the reform documents, the new Ofsted Inspection Framework is the one that will have the most immediate impact on children's daily experience, because it is the only one that is already live.

Reports do not change classrooms. Consultations do not change classrooms. White papers do not change classrooms. An inspector walking into a school and asking "show me progress from starting point for this child" changes classrooms. That single question makes "Below" unacceptable as an answer. The school that can pull up a developmental profile showing where a child was in September, what they have achieved since, and what they are working towards can answer that question. The school that has "Below" in their system has nothing to show.

The framework's stronger focus on inclusion, on how schools support pupils with SEND, and on demonstrating progress for disadvantaged pupils, including those with SEND, from their starting points is the most important thing that has happened for SEND children in years. Not because it creates new requirements, but because it creates consequences for not meeting them. For eleven years, schools have been able to use "Below" without challenge. That era is ending.

This matters because it creates the demand signal for everything else. Schools now need assessment systems that can show progress from starting point for every child. They need teachers who understand developmental progression below age-related expectations. They need intervention strategies matched to specific, identified needs rather than generic programmes aimed at a vague label. The Ofsted framework does not tell schools how to do these things. It tells them they will be asked to demonstrate them. That is more powerful.

TL;DR 4.1 The Ofsted Inspection Framework: The Enforcement Mechanism

The new framework is the only reform already live, and it is the one that will change classrooms most immediately. The question "show me progress from starting point" makes "Below" unacceptable as an answer. That single shift creates the demand signal for everything else.

4.2 The Curriculum and Assessment Review: Creating Space

The Curriculum and Assessment Review Final Report, chaired by Professor Becky Francis, takes an approach of “evolution not revolution.” It maintains the existing subject architecture and keeps GCSEs and A Levels as the backbone of the system. But within that structure, it proposes several changes that matter significantly for children with SEND.

The principle of depth over breadth, mastering core concepts rather than racing through content, is potentially the most important. If implemented genuinely, it could give teachers the time they currently lack to revisit concepts with children who need longer, to go deeper rather than faster, and to build the relationships that support learning. But the critical question is whether “depth over breadth” actually reduces the volume of content or merely reorganises it. If schools still cannot finish the curriculum before assessment season, nothing has changed.

The embedding of oracy across the curriculum is welcome and long overdue. Speaking, listening, and communication, including augmentative and alternative communication, are foundational skills that underpin everything else. But oracy is a skill that requires practice and confidence-building, not rote learning. It cannot be tested in an exam hall. If there is no assessment framework for oracy and the Government continues to measure what it values through written examinations, there is a real risk that oracy becomes a token addition rather than a genuine priority. If the Government values only what it can measure, or measures only what it values, I worry that oracy will be sidelined.

The scrapping of the EBacc as a standalone performance measure is a positive step. Evidence showed that it constrained subject choice, pushed disadvantaged and SEND pupils into subjects they were likely to fail, widened the attainment gap, and contributed to the decline of creative subjects. Its removal, combined with reforms to Progress 8 that give creative subjects parity with languages and humanities, should help broaden the curriculum experience for many children.

My biggest disappointment with the Review is assessment. GCSEs remain as the principal assessment method, with written examinations defended as the fairest and most resilient to generative AI. This means exam-only assessment will continue until at least 2042, when the next holistic review is scheduled. For neurodivergent children, for whom the exam environment itself is a barrier to demonstrating their knowledge, this is a failure. I have two neurodivergent daughters and supporting them through GCSEs was heart-breaking. The anxiety, the stress, the sheer hostility of the environment. With one in five pupils now neurodivergent, and daily headlines about failing SEND learners, the Review has missed an opportunity that will not return for fifteen years.

There are other assessment methods, coursework, portfolios, teacher assessment, creative projects, that are equally valid. Wales already uses adaptive reading and numeracy assessments for every pupil from Year 2 to Year 9, designed for feedback and progression rather than accountability. Universities are redesigning assessment around authentic tasks, digital methods, and student choice. Meanwhile, England’s school system doubles down on a twentieth-century assessment model for twenty-first-century learners.

It appears the phrase “SEND is not a bolt-on” applies everywhere except GCSEs.

TL;DR 4.2 The Curriculum and Assessment Review: Creating Space

Depth over breadth could give teachers the time they desperately need — if it actually reduces content volume. The embedding of oracy is welcome but risks being sidelined if it cannot be measured. The decision to keep exam-only assessment until at least 2042 is a significant missed opportunity for neurodivergent children.

4.3 The Schools White Paper: Restructuring How Schools Operate

The Schools White Paper restructures the organisational landscape within which schools operate. School groups, collaborative working, shared resources, a focus on belonging and inclusion as expectations rather than aspirations, these create the structural conditions for the SEND reform to function.

The concept of school groups, clusters of schools sharing SEND resources, expertise, and potentially funding is central to making the Targeted and Targeted Plus support layers work. If a single primary school cannot afford a speech and language therapist, but five schools in a group can share one, the provision becomes viable. The Experts at Hand model depends on this collaborative infrastructure.

The risk lies in implementation. If school groups become another layer of administration without genuine resource sharing, they add bureaucracy without benefit. If trusts treat them as an extension of their own structures rather than genuinely collaborative partnerships, the community-centred approach the reforms need will be undermined. And the questions about governance remain open: who decides the priorities within a group? How are resources allocated? What happens when schools disagree with the local authority?

TL;DR 4.3 The Schools White Paper: Restructuring How Schools Operate

School groups create the collaborative infrastructure that makes shared SEND resources viable. The risk is that they become another layer of administration without genuine resource sharing or community connection.

4.4 The SEND Reform: Redesigning How Needs Are Met

The SEND Reform consultation proposes the most fundamental restructuring of support for children with SEND since the 2014 Act. At its core is a layered system: universal provision in every classroom, Targeted support for children who need more, Targeted Plus for those with greater complexity, and Specialist provision through EHCPs for children with the most significant needs.

Individual Support Plans (ISPs) would replace the lower end of EHCPs, providing a documented but less bureaucratic framework for recording needs and provision. Experts at Hand - specialist professionals available to schools without requiring an EHCP process, would bring expertise closer to the child, earlier. Standardised EHCPs and a national data spine would reduce inconsistency and the postcode lottery. Phase-only reviews, rather than annual reviews, would dramatically reduce the administrative burden on schools and local authorities.

The seven specialist provision packages, currently just recommendations, are still in development, but they represent a significant attempt to bring national consistency to what has been a wildly inconsistent system. The Government acknowledges that children may need elements from more than one package, and that the list is indicative and likely to change.

There are legitimate questions that need answering as these packages are developed. Why seven? What is the evidence base for this particular taxonomy rather than another? Where do children with complex speech, language and communication needs without a learning disability sit, the child who is bright but cannot access the curriculum due to a significant language disorder? Where does a child with significant dyslexia difficulties fit? What about children with complex medical needs whose primary barrier is physical health rather than learning? For the two packages built around social and emotional development, how does the system handle a child who presents with both externalising and internalising behaviours at different times? And crucially, autism and ADHD feature within packages as descriptors rather than as primary

categories. For many families, those identities are central to how they understand their child. What does that mean for their relationship with the new framework?

These are not reasons to reject the packages. They are drafts, and the Government has been explicit that they will be developed with professional and parental input under an independent expert panel. But they are questions that need clear answers before the framework is finalised, and the consultation is the right moment to ask them.

These packages are changing the language from diagnosis-led to needs led. This is a big change and a student with autism could fit under multiple packages. Some children have co-occurring conditions, they could have autism and ADHD, this is when needs led starts to make sense, the more diagnoses a child has, the less the individual diagnoses matter and the more their needs matter. How do they present? What do they struggle with? What areas need support?

For parents of children who already have EHCPs, the transition is understandably frightening. These are families who learned through bitter experience that without a legal entitlement backed by tribunal rights, their child gets nothing. Asking them to trust a new system is asking them to trust the same institutions that already let them down. That is not irrational behaviour, it is learned behaviour. I believe the Government understands that existing EHCPs will need to be maintained, and that the new system must prove itself before those protections are changed. But the communication around transition could be much clearer, and the fear is real.

The biggest unanswered question is funding. The consultation talks about Targeted support, school groups, pooled resources, Experts at Hand, but provides almost no detail about how the money works. The notional £6,000 budget, which has been the foundation of SEND funding in schools, is going. The practice of schools having to account for all the spending around SEND with costed provision maps is going. Schools will apparently receive more funding, ring-fenced and protected, but will be expected to do more with it. The details around how much, who decides, what it is based on, is absent. In these documents, what is not there is often as important as what is.

TL;DR 4.4 The SEND Reform: Redesigning How Needs Are Met

The layered support model, ISPs, Experts at Hand, standardised EHCPs, and phase-only reviews are the right structural direction. The seven specialist provision packages raise legitimate unanswered questions about taxonomy and fit. The biggest gap is funding detail — almost nothing about how money actually flows through the new system.

4.5 Mental Health Support for All Children

One passage in the consultation document stands out to me personally. It describes how all settings should support children's mental health needs, "whether or not they also have identified SEND." That word "whether" does enormous work. It means a school cannot say "they are not on the SEN register, so it is not our responsibility." It means the neurodivergent child who is getting good grades but has not eaten lunch in a room with other people for two years should still receive support. This is the hidden group. The children who are academically fine but struggling socially, emotionally, and with their mental health. I was one of those children. Both my daughters were. The system has never seen them because they did not fail academically.

I believe the change from SEMH as an area of need to Social and Emotional as an area of development is linked to this change. That removal of mental health from this area is not saying mental health is not important. It is saying the opposite. Mental health is not an area of SEND, it is an area that all children and young people can struggle with and may need support. If this passage translates into practice without gatekeeping, it could be really transformative.

TL;DR 4.5 Mental Health Support for All Children

One passage stands out: support for children's mental health "whether or not they also have identified SEND." That word "whether" is doing enormous work. It could finally reach the hidden group — the children who are academically fine but struggling in every other way. If it translates into practice without gatekeeping, it could be genuinely transformative.

5. The Hidden Financial Logic

The Government has framed the reforms around better outcomes for children and increased investment. The £1.8 billion figure is prominent. What the Government cannot say publicly, because it would immediately be framed as “cutting SEND spending”, is that the current system contains billions of pounds being spent on the consequences of failure rather than on supporting children. If the reforms work, those costs reduce dramatically, freeing money that can be redirected into the provision the reforms are designed to deliver. There is a big difference between saving money through cost cutting and saving money by not failing children. It is the latter I feel the Government is trying to achieve.

TL;DR 5. The Hidden Financial Logic

The Government cannot say publicly that the reforms are designed to stop spending billions on the consequences of failure. But that is what is happening. There is a big difference between saving money through cost cutting and saving money by not failing children.

5.1 Transport

Local authorities spent almost £2 billion transporting pupils with SEND to school in 2024/25, a figure that has risen by 204% since 2015/16. The average cost per SEND pupil for transport is £8,116 per year, compared with £1,526 for mainstream transport, roughly five times more. One local authority reported spending £145,000 per year on transport for a single pupil. Projections suggest SEND transport costs could reach £3.6 billion by 2030 if nothing changes.

The primary driver is distance. Children are travelling further because their local school cannot meet their needs. It is important to be clear: the children currently making those journeys will continue to need transport. This is not a saving that arrives on day one. The reform works as a pipeline, fewer children enter the system requiring long-distance specialist placement as local provision improves, while those already in that provision continue to be supported. But over five to ten years, even a modest shift in where children are educated represents hundreds of millions of pounds redirected from transport to provision.

TL;DR 5.1 Transport

£2 billion per year, rising 204% since 2015/16. The primary driver is distance — children travelling further because local provision cannot meet their needs. The savings are real but operate on a five-to-ten year pipeline, not from day one.

5.2 Legal Costs

The Department for Education paid more than £13 million to HM Courts and Tribunals Service in 2023/24 just to administer SEND tribunals, nearly double the previous year and dramatically up from £600,000 in 2017/18. That is only the administration cost. Local authorities collectively spend an estimated £150–200 million per year on handling and losing SEND tribunal cases. Parents spend thousands more, families typically pay £7,000 to £8,000 for a single tribunal case. And the wider ecosystem of SEND lawyers, independent assessors, mediators, and support services adds further to the total.

If the reform reduces the adversarial nature of the system, through standardised processes, earlier identification of needs, better support before crisis point, and a system that families trust enough not to fight, the legal costs should fall substantially. This is not about removing EHCPs or blocking tribunal access. Families must retain the right to challenge decisions that affect their children's lives. The goal is a system where fewer families reach that point, because their child's needs were identified and met before crisis, not after.

TL;DR 5.2 Legal Costs

The DfE paid £13 million just to administer tribunals in 2023/24. Local authorities spend an estimated £150–200 million handling and losing cases. Families pay £7,000–8,000 per case. A system that families trust enough not to fight would redirect that money to children.

5.3 Annual Review Burden

Currently, every one of the 638,700 active EHCPs requires a formal annual review, each involving significant local authority officer time, administrative processing, and often leading to statutory amendment processes with their own timelines and appeal rights. If the reform moves to phase-only reviews, reviewing EHCPs at transition points between key stages rather than annually, the number of reviews local authorities process could drop by 70–80%. In any given year, only the children at transition points would require a formal LA review: the Year 6 cohort, the Year 11 cohort, post-16 leavers, and early years transitions. Everyone else simply continues with their provision.

The cost saving is significant. Even a conservative estimate of the per-review cost to local authorities, multiplied across hundreds of thousands of reviews, puts the annual saving in the range of £100–190 million. And for schools, the SENCO time currently consumed by coordinating annual reviews, easily a full day per review for a school with 30 EHCPs, would be largely returned to working directly with children.

A question worth raising as the detail is worked through: if EHCPs are reviewed at phase transitions rather than annually, does that mean funding is fixed for the duration of a phase? That would bring genuine advantages. Schools and local authorities could plan with confidence, knowing the resource is secure for a defined period, rather than managing the uncertainty of annual revision. But what happens when a child's needs change significantly mid-phase? A mechanism for interim review when circumstances change substantially would be essential to ensure that phase-based funding does not become phase-locked provision.

TL;DR 5.3 Annual Review Burden

638,700 EHCPs, each requiring a formal annual review. Phase-only reviews could reduce that by 70–80%, saving an estimated £100–190 million annually and returning significant SENCO time to children.

5.4 Professional Time Redirected

Educational psychologists currently spend a disproportionate amount of their time conducting statutory assessments for EHCPs, writing the psychological advice that forms Section B. There is a national EP shortage, and the available workforce is being consumed by the legal process of producing EHCPs rather than actually working with children and schools. If fewer children need EHCPs because their needs are met through Targeted and Targeted Plus support, EP capacity is freed to do what EPs are actually trained for. The

same applies to speech and language therapists, occupational therapists, and other specialist professionals who currently spend substantial time writing statutory advice rather than delivering therapy.

TL;DR 5.4 Professional Time Redirected

Educational psychologists are being consumed by the statutory EHCP process rather than working with children. Needs-led provision would redirect that expertise to earlier, more effective intervention.

5.5 The Assessment Industry

The diagnosis-as-gatekeeper culture has created an enormous private assessment market. Private autism assessments, ADHD clinics, independent speech and language assessments, occupational therapy evaluations, many exist purely because the system made clinical diagnosis the entry point to support. If the reform genuinely delivers needs-led provision, where schools respond to what they observe rather than waiting for a clinical label, the urgency for expensive private diagnosis reduces significantly.

TL;DR 5.5 Private Diagnosis

A parallel private diagnosis industry exists purely because clinical diagnosis became the entry point to support. Needs-led provision significantly reduces the urgency — and the cost — of that pathway.

5.6 Exclusions, Alternative Provision, and Absence

Children with unmet SEND are massively overrepresented in exclusion figures and alternative provision placements, both of which are expensive. If schools are creating environments of belonging, identifying needs early, and providing support before crisis point, fewer children are excluded. Every child who does not end up in a PRU because their needs were met in their local school represents a significant saving. Similarly, persistent absence, disproportionately driven by SEND-related factors including anxiety and unmet needs, reduces when the school environment works for the child.

TL;DR 5.6 Exclusions, Alternative Provision, and Absence

Children with unmet SEND are massively overrepresented in exclusions and AP. Every child whose needs are met in their local school represents a significant saving. Persistent absence, driven disproportionately by SEND-related anxiety and unmet need, also reduces when the school environment works for the child.

5.7 The Total Picture

Added together, the system efficiencies from the reform could potentially redirect well over £2 billion annually, money currently being spent on transporting children to distant schools, fighting their parents in court, processing paperwork that does not help anyone, and funding an entire parallel industry that only exists because the system is broken.

The Government cannot frame it this way. The moment they say “this reform will save money,” every headline reads “Government cuts SEND spending.” So they talk about new investment, let the savings accumulate as the system improves, and will eventually announce the redirected funding as additional

investment. Same money, different narrative. If the result is that the money ends up supporting children instead of funding lawyers and taxis, does it matter what they call it?

As I said at the beginning of this section, there is a big difference between saving money through cost cutting and saving money by not failing children. It is the latter I feel the Government is trying to achieve.

TL;DR 5.7 The Total Picture

Well over £2 billion annually is currently being spent on transporting children, fighting their parents in court, processing unhelpful paperwork, and funding an industry that only exists because the system is broken. The reform, if it works, redirects that money to provision.

6. What's Still Missing and What to Watch

The direction of travel is right. The joined-up thinking is real. But significant gaps remain, and the success or failure of the entire programme depends on how they are addressed.

6.1 Funding Detail

The biggest gap in the consultation is funding. How does money flow through the school group model? Who decides how pooled resources are allocated? What replaces the notional £6,000? How is ring-fenced funding calculated and distributed? What happens to funding for existing EHCPs during the transition, I know the funding will still be there, but how does the funding route change? Without detailed answers, schools cannot plan and parents cannot trust.

TL;DR 6.1 Funding Detail

The biggest gap in the consultation. How does money flow? What replaces the notional £6,000? How is ring-fenced funding calculated? Without clear answers, schools cannot plan and parents cannot trust.

6.2 Curriculum Content Reduction

The principle of depth over breadth only works if the content is actually reduced. If the refreshed Programmes of Study contain the same volume of material, repackaged under new headings, teachers will have no more time than they do today. For many children, this is the single biggest risk to the reform programme. Everything depends on teachers having time for the children in front of them. We have to wait until Spring 2027 to get the answer.

TL;DR 6.2 Curriculum Content Reduction

Depth over breadth only works if content is actually reduced. If the refreshed Programmes of Study contain the same volume repackaged, teachers have no more time than they do today. We find out in Spring 2027.

6.3 Assessment Below Age-Related Expectations

The SEND reform assumes that schools can identify children's needs, provide targeted support, and demonstrate progress. The Ofsted framework requires schools to show progress from starting point. But the national assessment framework below age-related expectations still does not exist in any meaningful form. The Pre-Key Stage Standards are too broad. The Engagement Model has no skills or knowledge content. The Government's guidance still tells schools to find their own assessment criteria.

The decision not to create a national assessment framework for this cohort is, in my view, a mistake, and one with significant consequences for the reform programme's success. I know that it is genuinely difficult, we have been doing it for 30 years and there is always scope for improvement. The children working significantly below age-related expectations are an extraordinarily diverse group. A single national framework may not be achievable in a way that serves all areas. But the absence of a national framework, leaves schools making it up, often poorly.

I should be transparent about our own position here. B Squared exists to fill exactly this gap. Connecting Steps is used by more schools than any comparable system, but it is still used by fewer than one in ten

schools nationally. That means more than nine in ten schools are either using something less comprehensive, building their own approach, or not meaningfully assessing this cohort at all.

If the reform genuinely depends on schools knowing where their SEND pupils are, as both the Ofsted framework and the ISP model require, but no national framework exists to provide a mechanism to know this, then the success of the entire programme rests on schools independently finding tools that the Government has chosen not to provide. How can schools share data meaningfully without using a consistent language? That is an unstable foundation, and it is one the Government should address before the reforms are implemented.

TL;DR 6.3 Assessment Below Age-Related Expectations

The Pre-Key Stage Standards are too broad. The Engagement Model has no skills content. The Government still tells schools to find their own criteria. Not creating a national framework is a policy mistake — and the entire reform depends on schools being able to identify where children are. B Squared fills part of this gap, but reaches fewer than one in ten schools.

6.4 Teacher Workload and the Behaviour Transition

Teachers' concerns about workload under the reforms are legitimate and deserve an honest answer rather than reassurance. The concern is understandable: more documentation, more ISPs, more evidence for Ofsted, more expectation of inclusion for children with increasingly complex needs. On paper, it looks like more work.

The reform logic, however, points in a different direction. A school that accurately identifies where children are, pitches learning at a level where they can make progress, builds genuine belonging, and responds to needs preventatively rather than reactively should, over time, carry a significantly lighter behaviour management burden. The EEF evidence is clear that improving behaviour through needs-led approaches can add the equivalent of three months of academic progress. The most effective schools focus on teaching positive learning behaviours rather than managing disruption. A child who can access their learning, who feels seen and capable, has a fundamentally different relationship with school than a child who has been labelled 'Below' for six years and has learned that school is a place where they fail. The disengagement, the acting out, the refusal, much of that is a rational response to a system that has not worked for them.

The honest caveat is about timing. The transition period asks teachers to build inclusive, warm, belonging-centred classrooms while simultaneously managing the accumulated consequences of years of unmet need. The children who will benefit most from the reforms, identified early, supported from the start, never labelled 'Below', have not yet entered the system. The children in classrooms today carry the deficit of the years before the intervention. It will, in all likelihood, get incrementally harder before it gets easier. That is not a reason to abandon the reforms. It is a reason to be honest with teachers about the shape of the journey.

The critical variable, for teacher workload specifically, is whether the 2027 curriculum genuinely reduces content volume. If 'depth over breadth' translates into fewer things taught more thoroughly, teachers get something they do not currently have: time. Time to go slower with a child who needs longer. Time for oracy. Time to notice that something is wrong and respond to it in the moment rather than flagging it for the SENCO in six weeks. Time, simply, to build the relationships and the warmth that the reforms describe but cannot legislate. If the new Programmes of Study arrive and the volume is largely unchanged, just

repackaged, none of that time materialises. The behaviour and workload picture remains stubbornly the same regardless of the rhetoric around inclusion.

Preventative is almost always cheaper than being reactive, in time, in emotional energy, and in human cost. But the investment comes before the return. The honest answer to teachers worried about workload is this: if the reforms work as intended, your job should become more sustainable over the next decade. But the next two to three years will require you to do the building work alongside the reactive work. The curriculum question will determine how much capacity you have to do both.

TL;DR 6.4 Teacher Workload and the Behaviour Transition

The reform logic points towards a lighter burden over time — but the transition period asks teachers to build inclusive classrooms while managing the accumulated deficit of years of unmet need. The honest answer is that it will get incrementally harder before it gets easier. The curriculum question determines how much capacity teachers have to do both.

6.5 Health and Social Care Contribution

The 2014 Act assumed health and social care would contribute meaningfully to EHCPs. They largely did not. The current reform makes similar promises about integrated support. Whether health and social care genuinely participate this time, with funding, professional time, and accountability, remains to be seen.

TL;DR 6.5 Health and Social Care Contribution

The 2014 Act made the same promises about integrated support. Health and social care largely did not show up. Whether they genuinely participate this time remains to be seen.

6.6 Transition for Existing EHCP Holders

The consultation indicates that existing EHCPs will remain until at least September 2030. But it is much less clear about whether the funding model changes underneath them before then. An EHCP without the funding behind it is just a piece of paper. The Government needs to be explicit about what the transition means for children who are already in the system, not just that their plans will continue, but that the resources to deliver them will be maintained.

TL;DR 6.6 Transition for Existing EHCP Holders

Plans will continue until at least September 2030, but the funding model underneath them is unclear. An EHCP without funding is just paper. The Government needs to be explicit about what transition means in practice.

6.7 Timeline

The reform timeline stretches to 2028 and beyond. The refreshed Programmes of Study are expected for first teaching in 2028. Updated GCSEs from 2029. The full SEND system may not be operational until the early 2030s. Every year of delay is another cohort of children navigating a system that everyone acknowledges is failing. Implementation must be as urgent as the rhetoric.

TL;DR 6.7 Timeline

The full system may not be operational until the early 2030s. Every year of delay is another cohort of children navigating a failing system. Implementation must be as urgent as the rhetoric.

7. What Schools Can Do Now: Don't Wait for the Reforms

The reforms will not arrive until 2028 at the earliest. Children in schools today cannot wait. The Ofsted framework is already live, already asking schools to demonstrate progress from starting point, already expecting evidence of inclusive practice. Schools need to act now.

I have spent 25 years watching this landscape. I have seen reforms arrive and stall. I have had conversations on The SENDcast, now over 290 episodes, with headteachers, SENCOs, parents, researchers, policy makers and the young people who have been through the system, about what schools actually need, as distinct from what policy documents assume they have. Through the SENDcast Sessions online CPD library, we have tried to make professional development accessible to practitioners who cannot always reach expensive training. I have raised two neurodivergent daughters through this system. I know what it feels like on both sides of the table.

I have also been to events and sat at the same table as a parent, a teacher, a head teacher from an independent special school, an external professional and someone from a local authority. I watched them all agree with each other and affirm each other's point of view. When we step away from social media and the news, we work together to support our young people with SEND and we need to do this more.

My experience has taught me one thing above all: you cannot wait for government to act. Children are in classrooms now. Their needs do not pause for consultation timelines. And like many schools, when we see a gap, in assessment, in professional understanding, in the tools schools need, we build something, we try to make a difference.

That is what we have done at B Squared. And that is what the rest of this section describes.

TL;DR 7. What Schools Can Do Now: Don't Wait for the Reforms

Schools cannot wait until 2028. The Ofsted framework is already live. B Squared has been building the tools schools need, not because a white paper said to, but because the gap was there and children could not wait.

7.1 Assessment That Sees Every Child

Connecting Steps is B Squared's assessment platform, a single system covering all pupils from the earliest developmental stages through to age-related expectations. SEND assessment is not an add-on module or a separate system: it is built into the same platform used for every child in the school. A teacher can see where any child is working, what they have achieved, what comes next, and how they are progressing over time, including children working significantly below age-related expectations, for whom the national framework provides almost no meaningful structure. This is precisely what the Ofsted framework now requires schools to demonstrate, and precisely what 'Below' has never been able to provide.

TL;DR 7.1 Assessment That Sees Every Child

Connecting Steps provides a single assessment platform covering every child from the earliest developmental stages through to age-related expectations — giving schools exactly what "Below" never could: a developmental profile that demonstrates progress from starting point.

7.2 Frameworks That Address Real Needs

Our Executive Function framework has been in development for over nine months, in partnership with Victoria Bagnall, Co-Founder and Managing Director of Connections in Mind, an organisation that provides coaching, training, and consultancy around executive function skills. Victoria has appeared on The SENDcast to discuss executive function, and the depth of that conversation was one of the reasons we knew this framework needed to exist. The starting point was simple but important: children who struggle with executive function, with attention, working memory, managing impulses, planning and organisation, are too often seen as behaviour problems rather than learning needs. They are being sanctioned for skills they have not yet developed. This framework helps schools identify where the child is with their executive function and respond with support rather than consequences. It was developed before the SEND reform named executive function as a key area of development. That the two arrived at the same moment was not coincidence, it reflected where the field was heading.

Our Alternative Provision framework is built around the PDAM, the Personal Development Assessment Model, developed by Philip Parker, an experienced education leader and founder of InspirEd. Philip has worked with schools, Alternative Provision settings, and local authorities to develop an approach rooted in the realities of reintegration practice. The PDAM assesses progress across five domains: Emotional Self and Identity, Relationships and Communication, Thinking and Achievement, Society and Citizenship, and Personal Management and Independence. These are the competencies that determine whether a child's return to mainstream education actually holds, whether the progress made in AP translates into sustainable engagement back in school. Until now, there has been no structured, consistent way to assess them. The framework gives AP settings, schools, and local authorities a shared language for evidencing impact and understanding barriers to engagement.

Our Social, Emotional and Mental Health framework was developed in partnership with Richard Daniel Curtis, an internationally recognised SEMH expert whose work spans education, psychology, and social care. Richard founded The Root Of It Group in 2013 and has written thirteen books on understanding emotions and behaviour. He was one of three experts brought in to write the mental health curriculum guidance in England, and his work has reached practitioners across five continents. Richard is the author of the Social and Emotional Skills Assessment, a tool for assessing the social and emotional development of children, which informed the design of this framework. The SEND reform rightly identifies social and emotional development as an area requiring support regardless of whether a child has a formal SEND identification. This framework gives schools the structure to do that work meaningfully, rather than reactively.

TL;DR 7.2 Frameworks That Address Real Needs

Three specialist frameworks: Executive Function (with Connections in Mind), Alternative Provision (with InspirEd's PDAM), and Social, Emotional and Mental Health (with Richard Daniel Curtis). Each built from observed need, each arrived at before the reform named them as priorities.

7.3 Joined-Up Data Across Settings

We are building the ability for schools to share pupil data seamlessly with alternative provision settings, so that when a child moves between mainstream and AP, the assessment information, evidence, and progress data travels with them automatically. No weeks of preparation. No information lost in transition. The school sees what the AP is achieving and vice versa. For schools working with multiple AP settings, this transforms continuity of support.

We are also building multi-organisation analytics, allowing trusts, local authorities, family SENCOs, and the new school groups to view SEND data across all their schools. A trust can see progress data for every child with SEND across all its schools. An LA can see SEND children across all the schools it works with. A school group can view its collective SEND picture. Schools choose what to share and with whom. As far as we are aware, no other system offers this flexibility.

TL;DR 7.3 Joined-Up Data Across Settings

Seamless data sharing between schools and AP settings, and multi-organisation analytics for trusts, local authorities, and school groups. Assessment information travels with the child. No data lost in transition.

7.4 Evidence and Family Communication

Evisense provides evidence-of-learning capture and a parental communication platform that builds the trust and collaboration with families that every element of the reform depends on. When parents can see what their child is doing, what they are achieving, and how the school is supporting them, the adversarial dynamic that drives so much of the current system's dysfunction begins to dissolve.

TL;DR 7.4 Evidence and Family Communication

Evisense gives parents visibility of what their child is doing and achieving. When families can see the evidence, the adversarial dynamic that drives so much of the system's dysfunction begins to dissolve.

7.5 Professional Development

The SENDcast, with over 290 episodes and more than 500,000 downloads, is the UK's leading SEND podcast, providing free, accessible professional development for teachers, SENCOs, and school leaders. The SENDcast Sessions online CPD library offers structured training that schools can access immediately. Because none of these reforms work without a workforce that understands how to implement them.

TL;DR 7.5 Professional Development

The SENDcast and SENDcast Sessions CPD library provide free, accessible professional development. None of the reforms work without a workforce that understands how to implement them.

7.6 Planning and AI

Later this year, we will release a planning module supporting IEPs, ISPs (when they arrive), and EHCPs. Powered by AI that understands where a child is in their developmental journey, the system will automatically identify appropriate next steps from the assessment data, bridging the gap between knowing where a child is and planning what they need next. This is the piece that connects assessment to action, and it is what the graduated response has been missing.

None of this is box-ticking. We are not building these tools because a white paper told us to. We are building them because we talk to schools and watch schools struggling without them, and we know what is needed. We will not wait for 2028. We will not wait for implementation dates. We will keep building, because the children in classrooms today cannot wait, and neither can we.

TL;DR 7.6 Planning and AI

A planning module — coming later this year — will use AI to identify appropriate next steps automatically from assessment data. The piece that connects knowing where a child is to planning what they need next.

8. Conclusion: Cautiously Hopeful

The current system is broken. That is not a controversial statement. It is the conclusion of every inquiry, every report, every review for the past decade. Nobody set out to build a broken system. What people intended and what the system became are two very different things. With so many organisations involved, and a framework open to interpretation at every level, the gap between intention and reality was probably inevitable. I have discussed many of the factors that brought us here, and left out many more that also played a part. What is different now is that someone is finally trying to fix all of it at once, recognising that the curriculum, the accountability system, school structures, inspection, and SEND provision are all part of the same system and must be reformed together.

I am cautiously hopeful. The direction of travel is right. The joined-up thinking is genuine. The Ofsted framework is already making a difference in how schools see and support children with SEND. The Curriculum and Assessment Review's emphasis on depth over breadth could create the time that teachers desperately need. The SEND reform's move towards needs-led, early support could prevent the years of failure that currently drive children towards EHCPs. The recognition that mental health support should be available regardless of SEND identification could finally reach the hidden group of neurodivergent children who are academically fine but struggling in every other way.

The risks are real. A lot of details are still absent. The curriculum may not genuinely reduce in volume. Health and social care may not show up. The timeline is long, and every year of delay is another cohort of children navigating a system that we know is failing them. The assessment framework below age-related expectations, the foundation on which I feel everything else depends, is still not addressed at the national level.

For children already in the system, with EHCPs that their parents fought for years to secure, the transition must protect what they have. An EHCP without funding behind it is just paper. The Government must be explicit about what continuity looks like, not just in words but in resources.

For children entering the system in the future, there are genuine reasons for optimism. A world where a child's needs are identified and supported from the first day they walk through the school door, without years of waiting, without requiring a clinical diagnosis, without their parents having to become legal experts. That world is worth building. The reforms describe it. Implementation will determine whether it arrives. How we respond as local authorities, trusts, leaders, teachers, parents and external organisations is what will make it work. It is down to us to work together.

But reports and consultations do not help children. Implementation does. And implementation depends on schools having the tools, training, and time to do what the reforms envision. Implementation requires co-operation, not blind obedience, but genuine working together: constructive conversations about what could work, not just declarations that it won't. That work does not start in 2028. It starts now, with all of us.

TL;DR 8. Conclusion — Cautiously Hopeful

The direction of travel is right and the joined-up thinking is genuine. The risks are real and the timeline is long. For children already in the system, the transition must protect what they have. For children entering it in future, there are genuine reasons for optimism. Implementation will determine whether the world the reforms describe actually arrives — and that depends on all of us working together, now, not in 2028.

Feedback

I welcome all feedback on this document, and I enjoy discussions around education and improving outcomes for all children and young people, but especially those with SEND and/or mental health support needs. Being able to get a wide range of opinions and experiences help us all to develop our knowledge.

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