

# GOVERNMENT SEND CONSULTATION – KEY PROPOSALS AND NASUWT CONCERNS **BRIEFING**

## **Purpose of this briefing**

This briefing provides NASUWT members with a summary of the Government's consultation on Special Educational Needs and Disabilities (SEND) reform launched on 22 February. It highlights the Union's initial concerns and the extent to which the Government's proposals would address the key issues raised by members if implemented.

## **The consultation at a glance**

The consultation sets out more than 150 pages of a wide-ranging programme of changes to the current SEND system that seek to create a 'reformed SEND system'. The Government states that its proposed reforms are built around a greater emphasis on earlier intervention, expanded mainstream provision and a more structured framework of support.

Key elements include:

- **A new layered model of support**

The proposals include the introduction of a three-tier structure comprising universal provision available in all schools, 'targeted' support focused on supporting more pupils with SEND in mainstream settings, and specialist services. The clear intention is that more children and young people over time will have their needs met within mainstream settings before accessing specialist provision.

- **Increased mainstream inclusion**

A core principle of the proposals is an expectation that more pupils with SEND will be educated in mainstream schools. This will be achieved through new guidance, training expectations and amended approaches to SEND assessment and provision planning.

- **Changes to statutory processes**

The consultation signals much tighter control over Education, Health and Care Plans (EHCPs), alongside new mechanisms such as Individual Education Plans (IEPs) produced by schools and revised support pathways intended to reduce reliance on statutory plans.

- **Workforce training and system reform**

There is a stated emphasis in the proposals on professional development, early intervention, collaboration between services and new accountability arrangements. The proposals include investment in SEND training programmes and reforms to local system structures.

- **Structural and organisational changes**

The Government has set out the principles on which wider reforms will be based, including strengthened local partnerships, regional commissioning approaches and expectations that schools will organise SEND provision within multi-academy trust structures as part of the broader system reforms set out in its accompanying [Schools White Paper](#).

- **A phased implementation timetable**

Implementation is presented as a multi-year programme, beginning with pilots and preparatory work before wider legislative and operational changes later in the decade.

### **NASUWT's initial assessment**

NASUWT supports the principle of improving SEND provision and has always recognised that reform is necessary. However, our early assessment highlights serious problems with the direction and assumptions that appear to underpin the consultation.

- **Teachers and SENCOs remain the missing voice**

The consultation gives extensive attention to parental experience and system sustainability. While this is important, it also appears to include very limited consideration of the professional realities facing classroom teachers in both mainstream and specialist settings and SENCOs. Teachers and SENCOs will be struck, in particular, by the consultation's apparent lack of regard for the challenges they face currently and for the even greater demands that risk being placed on them. Teachers are cast in the proposals primarily as a delivery mechanism for SEND provision rather than as professionals whose working conditions determine whether any reform can succeed.

- **Expansion of mainstream inclusion without workforce reform**

The proposals assume that more learners with SEND can be educated successfully in mainstream schools. However, there is little evidence that the reforms address core pressures identified by members, including excessive workload, large class sizes, behaviour challenges and the ongoing recruitment and retention crisis. Expecting schools to absorb additional complexity without a plan to address these deep problems risks intensifying existing pressures. There will also be concern that the increased expectations on teachers and schools could ultimately be enforced through a high-stakes and punitive inspection regime that would merely create pressure on schools and individual teachers, rather than address the systemic conditions needed for the development of a genuinely inclusive education system.

- **Training is not a substitute for professional conditions**

While expanded SEND training is welcome in principle, training alone cannot compensate for insufficient staffing, lack of specialist support or inadequate time to plan and adapt teaching. NASUWT members have been clear and consistent in their view that professional development must be accompanied by investment in time, resources and wider services.

- **Risk of increasing workload through new processes**

Proposals such as IEPs and revised support frameworks may introduce significant additional administrative burdens. Experience elsewhere suggests that poorly designed planning processes can generate unsustainable workload pressures for teachers and SENCOs.

- **Teachers currently compensate for wider system failures**

Schools and colleges already manage substantial unmet needs resulting from delays in health, mental health and social care services. Without substantial investment in those services, there is a risk that reforms will shift even more responsibility onto teachers without rebuilding the wider support infrastructure required in order to ensure that mainstream settings can meet the needs of pupils with SEND effectively and sustainably.

- **Inclusion must be properly resourced**

NASUWT's members are clear that without smaller classes, more specialist staffing, therapeutic support and appropriate learning environments, mainstream schools face considerable barriers to supporting the achievement of pupils with SEND. While the consultation sets out high-level aims around expanding access to external support, the detail of these plans and their sufficiency remains unclear. Expanding mainstream provision without these conditions in place risks creating little more than 'inclusion on the cheap' and would increase pressures on teachers while failing to improve outcomes for children and young people.

- **Funding realities remain unresolved**

Independent analysis indicates that the SEND system faces a substantial and ongoing funding gap alongside the erosion of early intervention and children's services over the past decade. Reform proposals that do not acknowledge and provide for the scale of investment required risk repeating the structural problems that have driven current pressures.

### **Next steps**

NASUWT is committed to high-quality SEND provision across the mainstream, special and alternative sectors and to the rights of children and young people. However, reform must start from the professional realities facing teachers.

The Union will continue to insist that:

- teachers are the key agents of successful inclusion and are not simply a workforce expected to deliver policy change without support;
- expanding mainstream provision without addressing workload, staffing and behaviour pressures is unlikely to be sustainable;
- training initiatives must be matched by investment in time, staffing and specialist services;
- teachers cannot continue to be expected to compensate for gaps in wider children's services; and
- a sustainable SEND system depends on rebuilding capacity around schools rather than shifting responsibility onto individual teachers.

This briefing reflects NASUWT's initial assessment. A more detailed response will follow once the full consultation document has been analysed in depth and members' views have been gathered.

The Union will continue to press for reforms that recognise the realities of classroom practice, protect professional working conditions and ensure that inclusion is properly resourced and sustainable.