

BRIEFING

ON THE GOVERNMENT'S PLANS FOR SEND IN ENGLAND

In February 2026, the Government published its consultation document, [SEND Reform: Putting Children and Young People First](#). This set out proposals for an education system where more learners with special educational needs and disabilities (SEND) have their needs met in a mainstream school near to where they live. The consultation closed on 18 May 2026. NASUWT's response to the consultation can be found [here](#).

The Government is still analysing responses to the consultation. However, it is already proceeding with some of the proposals set out in the consultation. In addition, some schools, multi-academy trusts (MATs) and local authorities may seek to introduce policies and practices in anticipation of Government policy. Therefore, it will be very important for NASUWT Representatives to engage with consultations, planning and decision-making processes that address SEND and inclusion. NASUWT Representatives should also monitor what is happening and feed back any issues and concerns to NASUWT.

This briefing outlines NASUWT's main concerns about the proposals and provides some questions to help NASUWT Representatives engage with planning and decision-making processes.

The Annex includes a summary of some of the key proposals.

NASUWT's position and our key concerns

NASUWT's position is that changes to the current system are necessary. Our surveys find that teachers, Special Educational Needs Co-ordinators (SENCOs) and leaders are experiencing huge challenges. However, we have very significant concerns about the direction of the Government's plans and the underlying assumptions being made. In particular:

The voice of teachers and SENCOs is absent from decision-making processes. As a result, very little attention is being paid to realities in the classroom and the current pressures that teachers face.

The Government's plans are likely to add to the existing workload of staff and increase the accountability of schools, including for factors that are outside their control.

Experts at Hand

Plans to provide earlier intervention and support to learners in mainstream schools is welcome in principle. However, we have concerns that the Experts at Hand programme will fail to recruit sufficient numbers of specialists to provide the level and extent of support that is needed. If experts are not available, then responsibility for meeting needs inevitably rests with those in the front line: teachers and staff in schools.

The Experts at Hand programme is focusing on building the capacity of school and setting staff rather than on providing direct support and interventions. This has implications for resources and is likely to increase workload pressures and expectations of school staff.

Experts at Hand – the role of specialist teachers

The proposals may increase the demands that will be made of teachers and staff working in specialist schools and settings. The [Experts at Hand guidance](#) clarifies that specialist teachers are among the experts that should be working with mainstream schools to develop their capacity for inclusion. We have concerns about the workload demands that will be placed on specialist teachers undertaking this role, and the pressure that will be placed on specialist settings to provide specialist teachers to undertake the role. We also have concerns about the assumption that specialist teachers have the skills and expertise to train staff in mainstream settings, and to offer advice and support in what are likely to be very different contexts.

Staffing and workload pressures on SENCOs, teachers and school staff

The SEND consultation document refers to the need for SENCOs to have a more strategic role rather than be overwhelmed with administrative tasks. This is unlikely to happen unless additional staff, including additional support staff, are employed. However, pressure on school budgets means that many schools are cutting staff, most notably support staff and those staff who work with learners who have SEND.

We are particularly concerned that the Government's plans will increase the workload and demands made of SENCOs substantially. We are also concerned that increased workload will be distributed across the school workforce.

Training as 'the solution'

£200 million has been identified to support staff training in schools, colleges and early years settings. If the money was just allocated to training teachers then it would amount to around £64 per teacher. In other words, the money is a drop in the ocean.

We are also concerned that the underlying assumption is that teachers are not competent or confident and that training will 'fix' the problem.

Training on the cheap is likely to increase the demands made of school staff and we are concerned that responsibility for delivering training will fall on the SENCO.

Funding

The proposals do not address the existing funding pressures on schools, settings and services and they do not address the additional costs of transitioning to a new system, including the costs of managing two systems through a period of transition.

The Government has not clarified the actual cost of effective inclusion in mainstream schools. The additional funding it has provided is focused on 'building capacity' rather than addressing current funding challenges and the increased demands that will arise as the result of having more learners with more complex needs in classrooms. Further, the proposals do not address issues such as class sizes, behaviour, the nature and relevance of the curriculum, and the increased time needed to plan and adapt lessons for more diverse classes, and to collaborate with other school staff and specialists.

Examples of effective practice cited do not explain the context under which the practice has been developed. This raises concerns about sustainability and scalability. For instance, a school or MAT may have drawn on their reserves to establish systems and practices but may not be able to sustain these practices and approaches without additional funding. The proposals depend on a wide system of support being available in mainstream schools. The reality is that many schools and services are making cuts. A recent [survey of school leaders](#) commissioned by the Sutton Trust found that 71% had cut teaching and assistant posts, and 49% had cut support staff posts in the past year, while four out of five senior leaders expected to make staffing cuts in the next year.

We have concerns about the speed at which funding proposals are being taken forward. On 10 July, the Department for Education (DfE) published a [consultation about creating a local SEND inclusion funding formula](#) which would allow local authorities to distribute more funding from the high needs budget directly to mainstream schools. Alongside this, the DfE is running a 'test and learn' programme and inviting local authorities to participate in the programme. While local authorities participating in the programme must consult their Schools Forum, we have significant concerns that they will fail to identify and address the impacts on some schools, e.g. schools that have significant numbers of learners with SEND, and learners with low-incidence high-cost needs. The approach may place more responsibility on schools to meet needs but schools may not receive the funding that they actually require to meet these needs. Further, the law hasn't changed. Local authorities will continue to have responsibilities in relation to needs assessments and funding Education, Health and Care Plans (EHCPs) but there will be less money in the high needs budget.

Accountability

There are significant risks for schools and school staff arising from the Government's plans. The proposals shift accountability from the local authority to schools. This is likely to be deeply problematic if there is insufficient funding to provide the resources and support that a learner needs, or if external services fail to provide the support outlined in an Individual Support Plan (ISP) or EHCP. The shift to placing responsibility on schools is also likely to increase tensions between parents and the school as parents press for the support that they believe their child needs. There are inevitable concerns about the role that Ofsted and inspection will play in judging schools' and settings' delivery of inclusion.

Health service engagement

The consultation document makes reference to the education system not being able to 'do this alone' and the need for a joint effort across public services including health, care and local government. NASUWT remains concerned about the lack of health and care involvement in meeting SEND needs and the pressures on schools and colleges when health and care services do not contribute. The consultation document refers to plans to produce joint DfE and Department of Health and Social Care (DHSC) guidance confirming how health professionals can delegate the delivery of health care tasks to staff in schools and the responsibility and accountability for delivery where healthcare tasks are delegated to staff in schools.¹ We are concerned that health services will seek to delegate tasks to schools irrespective of whether schools have staff with the relevant expertise.

¹ Page 100 of the consultation document: *SEND Reform: Putting Children and Young People First: Government Consultation*.

Suggested actions

There are many issues that will need to be picked up as changes to the SEND system emerge and we would welcome information and feedback on developments and issues in your area. We suggest that NASUWT Representatives pay particular attention to:

1. what schools are doing to develop their Inclusion Strategy. Schools must prepare their Inclusion strategy by 31 December 2026;
2. local authority actions relating to the development and implementation of their Inclusion Plan (note that plans may be referred to by another name such as SEND Reform plan). Plans should have been prepared and submitted to the DfE by the end of June 2026;
3. decisions being made about staffing, including changes to tasks, roles and responsibilities;
4. developments relating to the Experts at Hand programme, including expectations of, and actions involving specialist teachers and staff from specialist settings; and
5. funding, including changes arising from participation in the DfE's 'test and learn' programme which allows local authorities to allocate more funding from the high needs budget 'up front' to mainstream schools.

Questions to consider

Workload impact

1. Are workload impact assessments being conducted before decisions are made and plans developed?
 - a. Have workforce unions been involved in providing evidence about workload issues?
 - b. Have workforce unions been able to provide advice about likely workload impacts associated with different policy options?
 - c. Is evidence about workload impact, including that provided by workforce unions, used to plan and make decisions about policy options?

Local authority inclusion plans

2. Are local authorities consulting workforce unions about their inclusion plans?
 - a. What expectations are being made of mainstream schools?
 - b. What expectations are being made of teachers and staff in specialist settings?
 - c. Do plans prioritise specialist inclusion bases in mainstream schools rather than special schools?

School inclusion strategies

3. Are workforce unions being consulted as schools develop their inclusion strategies?
 - a. Who is developing the strategy?
 - b. Does the strategy set out how the school's notional budget for SEN and additional funding, such as the Inclusion in Mainstream Fund (IMF) and upfront funding from a local SEND inclusion formula, are spent?
 - c. How does the strategy address the Universal Offer (the offer to all learners)?
 - d. What are the plans for future investment?
 - e. How are Inclusion Support bases addressed in the strategy?

Funding

Inclusive mainstream fund

1. How are schools planning to use their IMF funding?

Local authority inclusion plans

2. Are local authority inclusion plans costed, realistic and sustainable?
 - a. What are the implications for teachers and staff in mainstream schools and specialist settings?

Upfront funding for mainstream schools 'test and learn' programme

3. Has the local authority applied to participate in the DfE's 'test and learn' programme which will allow the local authority to provide more funding from the high needs budget 'up front' to mainstream schools?
 - a. Has the local authority consulted meaningfully with the Schools Forum when drawing up its proposals?
 - b. Has the local authority consulted SENCOs and school leaders about the proposals?
 - c. Do the proposals consider the risks for different schools (e.g. 'magnet' schools with large numbers of learners with SEND, schools with high-cost low-incidence SEN, small schools)? How are risks identified and mitigated?
 - d. Do the proposals include arrangements for monitoring and obtaining feedback from schools, including feedback about budgets, staffing, workload and sustainability?
 - e. How will the arrangements be evaluated for their impact?
 - f. Do the proposals mean that there will be less money in the high needs budget to meet higher levels of need such as funding EHCPs? If there is less money, how will the authority fulfil its responsibilities in relation to EHCPs and needs assessments? Is the authority seeking to change thresholds for accessing support?
 - g. How will MATs implement the arrangements?

Funding school inclusion strategies

4. Are school inclusion strategies costed?
 - a. What are the implications for staffing and workload?
 - b. Is the strategy sustainable?

Pooling school budgets

5. Are schools or MATs pooling budgets for SEND?
 - a. If yes, how were the arrangements established?
 - b. What challenges have arisen?
 - c. What are the implications for school staff, particularly SENCOs, of pooling arrangements?

Annex – summary of key SEND proposals

Universal, Targeted, Targeted Plus and Specialist support

The proposals are to replace the current system of SEN Support and Education, Health and Care Plans (EHCPs). In addition to the Universal Offer available to all learners, the proposal is that there will be three layers of support for learners who have SEND and whose needs cannot be met by the Universal Offer: Targeted, Targeted Plus, and Specialist.

The Universal Offer is the baseline of provision that should be available in all mainstream schools and settings.

Targeted support refers to support provided by the school or setting that cannot be met through the Universal Offer.

Targeted Plus refers to specialist support that is provided to children and young people in mainstream schools or settings who require greater levels of support than that provided by Targeted support. This might include time-limited support in alternative provision (AP) or an inclusion support base that the school has established, as well as drawing on expert help from outside of the mainstream school or setting.

Specialist Support is for those children and young people with the ‘most complex needs’. The support may be provided in special schools or settings, or in specialist bases in mainstream schools.

Inclusion bases – Support and Specialist

The consultation proposals describe two types of inclusion bases: Support and Specialist.

Inclusion Support bases are bases established and funded by the mainstream school. The intention is that learners attending the base would be doing so on a temporary basis before returning to mainstream classes.

Specialist Inclusion bases will also be located in mainstream schools but will be commissioned and funded by the local authority. These bases will be for learners who have Education, Health and Care Plans (EHCPs) and who might otherwise be educated in special schools or settings.

While the Government intends to keep special schools, the indications are that they want to increase the number of specialist inclusion bases in mainstream schools. This includes putting pressure on local authorities to prioritise establishing specialist inclusion bases in mainstream schools rather than creating new special schools.

Individual Support Plans (ISPs) and Education, Health and Care Plans (EHCPs)

Every child or young person identified as having SEND will have an Individual Support Plan (ISP). Schools and settings will have a statutory duty to produce and maintain the ISP. ISPs will be digital and will set out the day-to-day provision needed to meet the learner’s needs and the progress towards outcomes. The school or setting will be responsible for delivering the education provision in the ISP.

Education, Health and Care Plans (EHCPs) will be restricted to children and young people with 'the most complex needs' who require 'highly specialised provision'. This may be provided in specialist or mainstream schools or settings.

EHCPs will differ from the current process. The local authority will remain responsible for assessing needs, but will use national Specialist Provision Packages (SPPs) to determine whether and what specialist support is needed. Once this has been established, the local authority will identify where the child or young person will be placed. Following this, the EHCP will be developed, with the school or setting taking the learner in consultation with their parents.

The EHCP will guarantee statutory entitlements to the educational provision from the Specialist Provision Package. It will also address the health and care provision agreed during the assessment process. The school or setting will have a legal duty to deliver the educational offer in an EHCP but the local authority will retain overall ownership of the EHCP.

The proposal is that ISPs should be reviewed at least annually. The expectation is that the setting would review the EHCP at least termly while the local authority would review the EHCP at the end of a key stage.

Experts at Hand

The Government has £1.8 billion over three years to develop the Experts at Hand offer. Of this money, £1 billion is being given to local authorities and Integrated Care Boards (ICBs) to commission expert professionals to work with mainstream schools and settings. £800 million *'will be for local authorities to support specialist settings to build the capacity of mainstream settings'*.

The [guidance for local authorities on establishing Experts at Hand](#) makes it clear that the money must be used to build support for early intervention, prevention and inclusion in mainstream settings.

The specialists included in the programme are educational psychologists, occupational therapists, speech and language therapists and specialist teachers from specialist settings such as special schools and alternative provision.

The Experts at Hand programme guidance makes it clear that specialists should focus on **supporting** teachers and staff in mainstream schools and settings. While they might be involved with jointly delivering some group and class interventions or jointly developing and delivering training, the emphasis is on providing advice, guidance and support to build capacity of the staff in the mainstream setting. In rare instances, specialists might undertake some direct one-to-one work with learners.

The SEND consultation document suggested that experts in the Experts at Hand programme would provide support to learners with SEND who are identified at the Targeted Plus layer who require higher levels of support in a mainstream setting. This is less clear in the guidance for local authorities where some of the strategies provided as examples could be understood to involve the expert providing support to teachers and other staff at the Universal and Targeted levels. Therefore, it will be important to monitor developments, including what is prioritised as a result of funding and resourcing pressures.

Funding

The Government has made a number of announcements around funding its proposed changes to the SEND system. These include:

£1.8 billion over three years for the **Experts at Hand programme**. £1 billion of this is for local authorities and Integrated Care Boards (ICBs) to commission experts to work directly with mainstream schools and £800 million is to support specialist settings to help build the capacity in mainstream schools and settings.

£1.6 billion over three years for the **Inclusion in Mainstream** (IMF) fund. On 5 June 2026 the IMF funding allocations were announced. This amounts to £500 million per year with £400 million per year going to schools. Schools are expected to use money from their notional budget for SEN plus the additional money from the IMF to build their capacity around inclusion. The breakdown of the funding allocation is as follows.

- Every school gets £3,000 from IMF. They will also get further funding per pupil and funding per eligible pupil with low prior attainment (LPA).
- In the case of primary schools, the school will get £3,000 plus £16 per pupil and a further £79 for each eligible pupil who has low prior attainment.
- In the case of secondary schools, the school will get £3,000 plus £14 per pupil and an additional £88 for each eligible pupil who has low prior attainment.

The Government has announced £200 million to train staff in schools, early years and further education around SEND and inclusion. It has also announced that local authorities will receive £200 million to support transformation of their SEND services which will be focused on capacity building.

In addition, the Government has announced capital funding of £3.7 billion from now until 2030 to establish inclusion bases and special schools and to make buildings more accessible. This money has drawn from savings elsewhere in the DfE.

The Government also announced that it would clear 90% of local authority deficits arising from overspend of high needs budgets. This is in recognition of the high number of local authorities carrying deficits due to overspend on their high needs budget. However, local authorities must submit a local SEND Inclusion Plan which the DfE must approve in order for the 90% to be cleared.

The Office for Budget Responsibility (OBR) assessed spending on education and estimated that an additional £6 billion would be needed by 2029/30 in order to maintain existing provisions. While clearing 90% of local authority deficits will help to reduce the current overspend, it fails to address the root causes of the problem. Further, there will be significant additional costs arising from running two systems through a period of transition. The proposals do not address these additional costs.

Consultation on creating a 'local SEND inclusion' funding formula

On 10 July, the DfE launched a consultation, [Upfront Funding for Mainstream Schools: creating a local SEND inclusion formula](#). The consultation is looking at whether local authorities might distribute more funding from the high needs budget directly to schools as part of their notional budget for SEND. The consultation ran until 18 September.

Alongside the consultation, the DfE invited local authorities to [participate in a 'test and learn' programme](#), to examine the impact and effectiveness of more high needs funding being allocated directly to mainstream schools using a local funding formula. Local authorities wanting to participate in the programme must have registered their interest by 18 September and submit their application by 30 October 2026. The guidance indicates that local authorities must consult their Schools Forum as part of this process. If successful, local authorities would establish a local formula for distributing more of their high needs budget to schools. The programme will run during the 2027/28 academic year.

Pooling funds

The SEND consultation document makes reference to plans that schools should pool some of their SEND budgets in the future. It isn't clear whether this might involve schools in a single MAT pooling their SEND budgets, or whether it might be locality based.

It should be noted that an initiative to support local authorities participating in the Delivering Better Value programme (a programme for local authorities with high needs deficits) included schools pooling budgets into a local area fund and the pooled funding being used to fund support for early intervention and to plan support to meet higher levels of need.

Accountability

There will be a legal duty on schools and settings to prepare and maintain an ISP for every learner who has SEND.

EHCPs will guarantee the provision from a specialist provision package (SPP). While the local authority retains overall responsibility for the EHCP, the school or setting will be legally responsible for delivering the education provision set out in the plan.

Schools must publish an **inclusion strategy by 31 December 2026**. The strategy must set out how the school delivers inclusion and how they are using their funding, including that from the Inclusive Mainstream Fund, to support inclusion.

Ofsted will assess how leaders ensure that the inclusion strategy is embedded in practice and how staff are equipped to deliver it. The Code of Practice will be updated to include a requirement that staff receive training around SEND and inclusion.

There is an expectation that governing bodies and trust boards will interrogate the school's inclusion strategy as well as a sample of ISPs and data to monitor progress and the effectiveness of provision.

Ofsted inspections evaluate inclusion both as a discrete area and threaded across evaluation areas. Ofsted will assess the quality and use of ISPs as part of school inspections.