

# Draft consultation response – School business leader focus

## Putting Children and Young People First: SEND Reform Consultation 2026

Following a session developed and delivered with Stone King, we have collected the key points discussed and raised by members in relation to the SEND White Paper consultation.

From this discussion, we have created this guide on the draft responses and points which SBPs may wish to use to consider and help frame their individual responses to the consultation, which can be found here: <https://consult.education.gov.uk/send-strategy-division/send-reform-putting-children-and-young-people-firs/>

We encourage all school business leaders to share their views, as it is important that the consultation is used as the mechanism to collect and share the volume of queries that exist within the sector.

Please note the closing date: **18 May 2026**.

### **1 Views on the ambition for mainstream settings to meet a greater proportion of need**

We support the ambition to improve inclusion within mainstream schools. However, the scale of expectation placed on schools – particularly the requirement to deliver Universal, Targeted, and Targeted Plus support, establish Inclusion Bases, and produce Individual Support Plans (ISPs) for all pupils with SEN – cannot be met without significantly more clarity and sufficiency in long-term funding.

The reforms assume that mainstream schools can absorb a far higher proportion of need, but the funding detail is incomplete. The slides highlight that while place funding is currently around £6k, there is no clarity on future revenue funding for Inclusion Bases or Targeted/Targeted Plus support. Without this detail, schools risk inheriting duties that exceed their resource capacity.

### **2 Funding arrangements and financial impact**

The intention to rebalance funding from the LA High Needs Block into core budgets is understood, but the risk to schools is substantial:

- Funding is to be distributed through proxies in the National Funding Formula rather than based on actual SEND need, which could create a mismatch between pupil needs and available resources.
- Schools must publish Inclusion Strategies and will be held to account for spending the new “inclusive mainstream fund”, increasing administrative and reporting burdens.
- Pooled budgets, while collaborative in principle, reduce individual school financial planning certainty and risk creating inequities if pupil needs cluster unevenly.
- Capital funding of £3.7bn and revenue allocations of £1.6bn may not be sufficient to meet new estate and staffing expectations at national scale.

Given these uncertainties, schools cannot responsibly agree to the scale of proposed duties without transparent, predictable, and ring-fenced funding plans.

### **3 Workforce capability, training, and capacity**

From 2026, all settings must engage with new mandatory SEND and inclusion training. This is positive but creates major practical challenges:

- SENCO workloads will rise significantly due to ISP production, annual and phase-transition reviews, coordination of Support Bases, and monitoring against national inclusion standards.
- Mainstream staff require substantial adaptive-teaching training before reforms take effect; current timescales are too compressed.
- TA recruitment and retention challenges already limit capacity; reforms risk widening the workforce gap unless support staff pay, training, and career pathways are addressed.
- Specialist schools are expected to provide increased outreach and short-term placements, yet their staffing capacity is already stretched.

Without a phased, fully funded workforce plan, schools will struggle to deliver the reforms safely and effectively.

## **4 Estate development and inclusion bases**

DfE inclusive design guidance will require mainstream schools to deliver:

- sensory spaces and regulation rooms
- improved ventilation
- accessible changing facilities
- new Inclusion Bases at primary and secondary level

While these are essential improvements, they represent major capital and operational cost implications. It is expected that Inclusion Bases will replace resource bases and SEN units but provide no clarity on long-term revenue funding or maintenance costs, posing significant risk to school budgets.

The capital footprint of many schools simply cannot accommodate these new spaces without substantial multi-year investment.

## **5 Individual support plans (ISPs), legal clarity, and accountability**

The introduction of ISPs as a new legal obligation for schools, drafted without LA oversight, is a major area of concern:

- There is no existing statutory guidance on format, decision-making, evidence requirements, or accountability mechanisms for ISPs.
- ISPs will hold the detailed provision previously included in EHCPs, potentially increasing schools' legal exposure. Oversight arrangements are unclear regarding ISP delivery and what recourse is available if the support detailed is not sufficient (based on parent expectation) or not met.
- Parent complaints and disputes will shift from the LA to individual schools and trusts, creating significant administrative burden and potential escalation without additional capacity.
- Governance expectations will grow, as the new approach will require boards to sample ISPs, increasing workload for volunteers who may not have the skills to dispense this duty.

Schools need legislative clarity, standardised templates, and accessible national guidance before ISPs can be implemented safely.

## **6 System-wide pressures and implementation feasibility**

The reforms are described as a "decade-long programme", but several elements will impact schools much sooner, including:

- training requirements from 2026
- establishment of Inclusion Bases
- production of Inclusion Strategies
- increased specialist outreach expectations

Each represents a major administrative and financial burden. Without a clear transition plan, many schools will face compliance risks.

## **7 Summary of member-suggested requests**

Member feedback suggests the DfE should consider the following:

- 1 Provide clear, multi-year, ring-fenced funding for staffing, training, Inclusion Bases, and estate adaptations.
- 2 Publish statutory guidance for ISPs, with national templates, legal frameworks, and clear complaint-handling processes.
- 3 Introduce realistic transition timelines aligned with workforce development needs.
- 4 Ensure capital funding is scaled to meet the full requirements of inclusive estate design, not minimum standards.