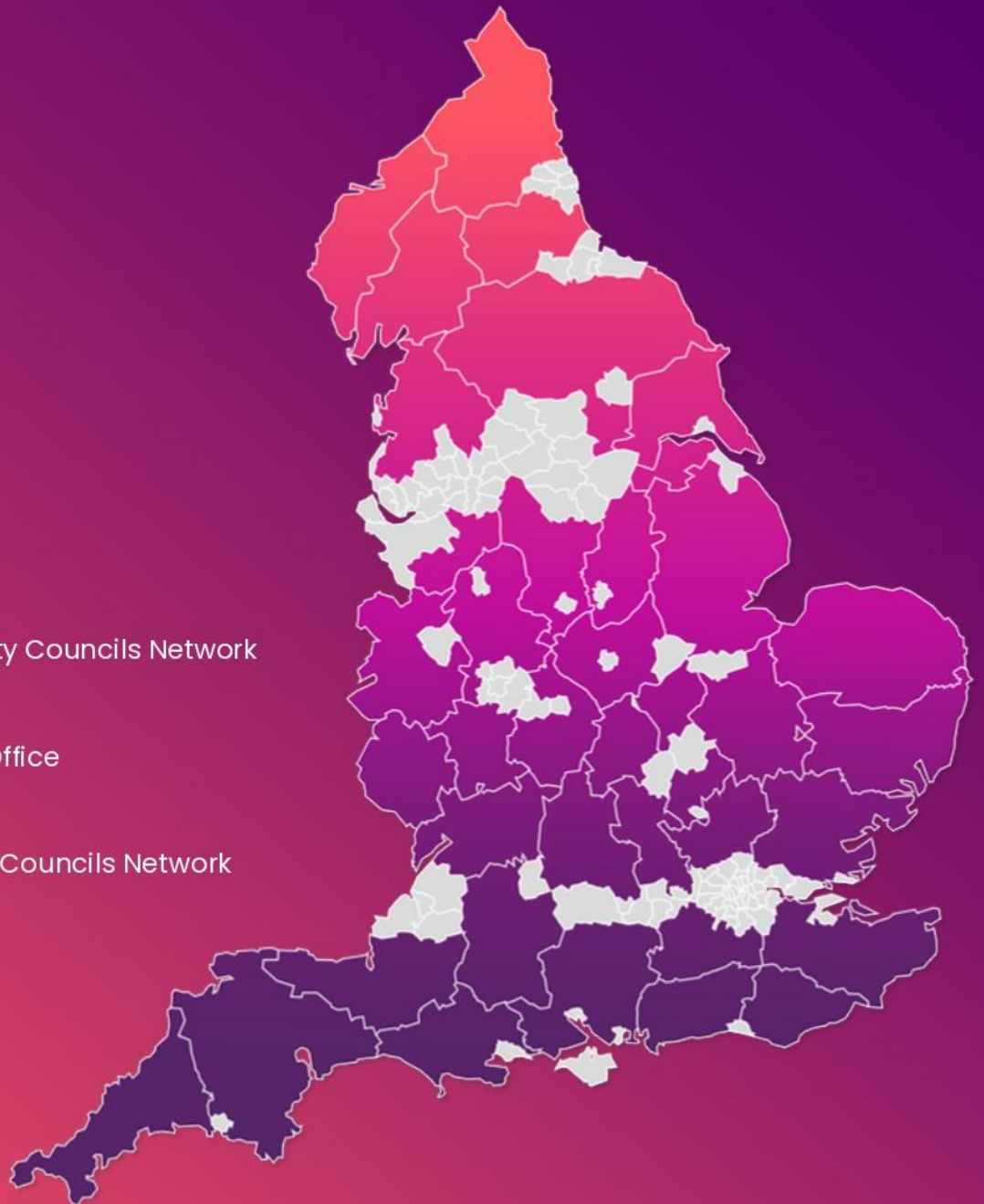


CONSULTATION RESPONSE

**SEND REFORM - PUTTING CHILDREN
AND YOUNG PEOPLE FIRST**

MAY 2026



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Introduction

1. The County Councils Network (CCN) is the voice of England's counties. Representing the local authorities in county areas, the network is a cross-party organisation which develops policy, commissions research, and presents evidence-based solutions to issues on behalf of the largest grouping of councils in England. In total, the 21 county councils and 18 unitary councils that make up the CCN represent 27 million residents, account for 39% of England's GVA, and deliver high-quality services that matter the most to local communities.

Summary

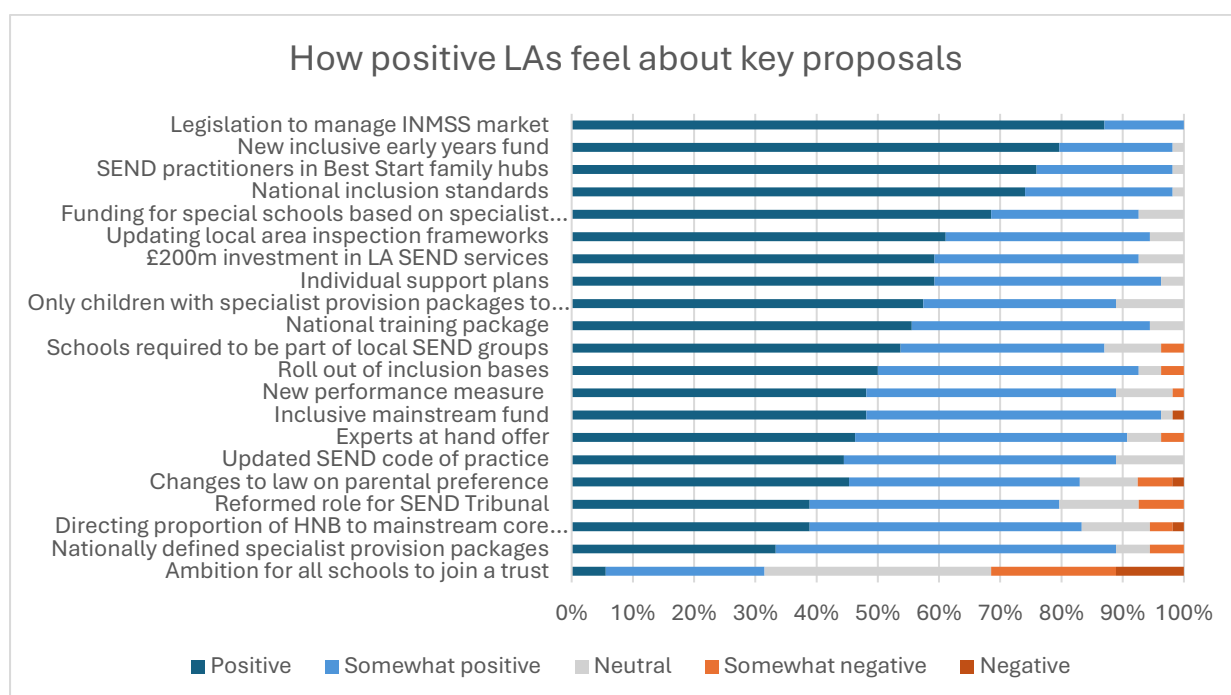
2. CCN has advocated for its member councils extensively on the Special Educational Needs and Disabilities (SEND) system since the turn of the decade¹, commissioning and publishing a range of research, including the 2024 independent report *Towards an effective and financially sustainable approach to SEND* from Isos Partnership, jointly with the Local Government Association (LGA).² CCN and Isos Partnership subsequently updated the underpinning analysis of the challenges facing the system in the November 2025 report, *SEND: Special Educational Needs in England – How we got to crisis point*.³ Alongside defining the scale of the challenges in the present SEND system, these reports set out a comprehensive top-level plan for how reform might be achieved over a ten-year period, based on wide-ranging discussions across the sector including with schools, parents, health bodies, and young people themselves, as well as local authorities.
3. CCN strongly welcomes the Government's proposed reforms to the SEND system set out in document *Putting Children and Young People First*. In particular CCN is pleased that the plan adopts a number of the suggested recommendations for the direction of reform set out in the 2024 Isos report, most notably:
 - A clearer framework to set out service expectations and price-bands across all levels of SEND provision through the creation of 'specialist packages';
 - an intention to rebalance the system towards early intervention (including improving SEND support within the early years);
 - better integration of the mainstream and SEND systems so they are no longer so siloed, allowing better expertise and practice shared across both systems and allowing children can more easily move between the two;
 - investment in SEND capacity within the state sector – including new 'Inclusion Hubs' within mainstream schools – designed to reduce the reliance on significantly more expensive placements in Independent schools.
 - improved accountability to ensure consistent standards across the country for inclusive practice within the mainstream school system;
 - a curtailing of the role of the Tribunal's ability to overrule local authority decisions over specific placements.

¹ See Appendix D for a full list of CCN publications on this topic

² <https://www.countycouncilsnetwork.org.uk/download/5402/?tmstv=1778509174>

³ <https://www.countycouncilsnetwork.org.uk/download/6179/?tmstv=1778154190>

- CCN also strongly welcomes the additional measures put in place over and above the reform plans set out in this consultation. Measures to alleviate 90% of existing SEND deficits up to March 2026; the announcement at the Budget that central government would assume responsibility for fully funding SEND services at the point the statutory override ends in March 2028; and the improved focus on inclusion within the recent Ofsted reforms are all measures called for and supported by CCN, which increase the probability of successful reform.
- Our members and local government are largely in favour of the reforms set out. CCN and the LGA have again commissioned Isos Partnership to gather views from across the sector on the proposals set out in the consultation. Over 81% of councils responding to a survey conducted within this research believe that the reforms will improve outcomes for children while 85% feel they will create a SEND system that is 'more sustainable to deliver'. Some of the other findings from this survey were as follows:



- Additional to this the main concerns with the reforms that councils have raised are:

- Over a third feel the timescales for reform are too ambitious or slow.
- Just under half do not have confidence in key partners (e.g. schools, health) will have the capacity to deliver the reforms.
- Only a quarter believe local government will be able to fulfil their statutory duties and support transition within the funding envelope over the next three years.

A full summary of this new research can be found in Appendix B and some of the qualitative feedback received is incorporated within this response.

- Whilst CCN supports overall direction of the reforms as extremely positive, this response also highlights some areas which have not been addressed or which need additional clarity in order for the overall strategy to be successful. These include:

- Partnerships and Accountability
The responsibilities of key partners and how they will be held accountable for delivering their contribution to a successful SEND system – in particular the role of health.
- Funding of the local authority role
Further clarity is required over the mechanisms by which local authorities will be funded for their role in the new system. Whilst the Government’s commitment to fully funding SEND provision centrally has been welcomed by our member councils, the proposals to continue funding LAs through a reformed High Needs Block (HNB) going forward suggests a status quo in this regard. **Councils must be reassured that they are never allowed to be placed in the financial position they have been over the past six years ever again.**
- Deficits post-2028
Whilst the Government’s commitment to alleviating 90% of existing HNB deficits held by local authorities up to 2026, is extremely welcome, local authorities still have concerns over the remaining 10% (which in some cases still risks the councils’ sustainability), but also deficits accrued between now and the point the Statutory Override ends in 2028. This is particularly pertinent given recent Isos research conducted in light of the new proposals suggests councils are seeing a sharp surge in applications for EHCP assessment ahead of any reforms being implemented.
- Home to School Transport (HTST)
The CCN report *Home to School Transport: How SEND reform can make services more sustainable*⁴ shows how SEND HTST is the key driver of costs in this area – costs which are disproportionately borne by CCN member councils with larger geographies. SEND reform will be crucial in helping local authorities deliver this service sustainably and more needs to be incorporated into the proposals to ensure this crucial area is addressed within the overall strategy.

Overview

8. It is widely acknowledged that the system for SEND is broken. It does not work for children, parents, schools or councils alike. Whilst reforms a decade ago that expanded eligibility for SEND support via Education Health and Care Plans (EHCP) were put in place with the best of intentions, they have led to significant unfunded demand; an over reliance on expensive special school provision; with increasing waits for assessments; and little or no tangible improvements in outcomes for children.
9. These findings have been evidenced within a number of CCN reports on the topic of SEND over recent years a full list of which can be found in Appendix D. Additionally, Appendix A contains an overview of key findings and most recent statistics from our latest research with Isos Partnership contained in the report *SEND: How we got to crisis point and why we need reform of the system*.⁵ In particular this report highlighted that an additional £30bn has been invested in the SEND system over and above 2015 levels of spending and councils spent £12.2bn on SEND in 2025 – three times more than a decade ago.
10. Despite the greatly increased spending, though, there is little evidence to suggest that outcomes for children or the experiences of their families have improved. The gap in

⁴ <https://www.countycouncilsnetwork.org.uk/download/6361/?tmstv=1778487098>

⁵ <https://www.countycouncilsnetwork.org.uk/download/6179/?tmstv=1778154190>

academic outcomes between children with SEND and the wider pupil population has not closed over recent years, whilst families report that the SEND system is more adversarial and draining now than before the reforms.

11. The perfect storm of demand and financial challenges has occurred despite all parties acting rationally in their interests – parents naturally wish to secure the best options for their child’s education; schools must balance how best to use their limited resources to address the needs of all students; and councils have a responsibility to spend public money effectively.
12. CCN has stressed that reform of the SEND system has been inevitable for some time and is unavoidable.⁶ CCN is pleased that the with this consultation Government has set out proposals for reform of the required scope to meet the scale of the problem.

CCN Response to key measures in the reform plans

13. The following points are the key issues which CCN and its member councils believes the Government needs to consider to ensure that the proposed reforms will be successful. **This section is supplemented by comments gleaned from a survey and workshops conducted by Isos Partnership during the consultation period on behalf of CCN and the LGA, which engaged the views of over a third of English local authorities.**

Direction of travel and a more inclusive education system

14. CCN is very supportive of the direction of travel set out in the consultation, in particular the commitment to making the education system more inclusive. Whilst some children will always require specialist education, the stark and continuing gap between outcomes for those in the SEND system compared to mainstream education despite such extensive investment, suggests too often a label of ‘SEND’ leads to lower expectations of a child’s ability to achieve by the education system. CCN believes the more children can be kept in the mainstream system – sometimes with additional SEND support – they are more likely to be pushed to reach their potential.
15. The measures set out in the consultation alongside considerable investment by the Government in new specialist schools places and ‘inclusion hubs’ within mainstream schools are extremely welcome. The 2014 reforms have had the effect of moving more children further away from the mainstream, often driven by perverse incentives for schools to avoid taking on the pupils with more expensive needs due to the impact on their overall budgets. The move to increase overall places and improve support around the school is the right one that CCN believes will lead to improved outcomes over time.
16. The move to provide clearer definitions of what is to be expected to be delivered in terms of SEND by different partners at the different tiers is also welcome. Too much of the present adversarial nature of the system is presently driven by uncertainty over what should be provided by who to meet a child’s needs. More clarity – for professionals as well as for families – will hopefully mitigate some of this going forward:

“For local authorities, the move towards nationally defined expectations of high quality

⁶ <https://www.countycouncilsnetwork.org.uk/download/5402/?tmstv=1777999416>

SEND practice, alongside additional investment in early specialist support, creates the conditions for better outcomes for children and greater system sustainability. It also aligns with ambitions to reduce adversarial processes and focus resources where they have the greatest impact.”

17. CCN also welcome steps to tackle high costs for placements in Independent Schools, that often come with less regulatory oversight or significant improvement in outcomes. CCN recently highlighted that these placements can cost as much as three times a specialist school in the state sector.⁷
18. A comment to the survey conducted by Isos Partnership with local authorities over the course of the consultation period summed up the hopes of most councils for reform, stating it wanted to see:

Timescales

19. CCN’s previous research with Isos Partnership in 2024 recommended:

“A long-term commitment from central government to follow through with these changes once the direction is set, providing local authorities with the sustained support necessary to manage a complex ten-year programme.”

“The timescales for reform would depend on a range of external factors, but we are under no illusions that this reform programme would need to be a long-term one, lasting at least one if not two parliamentary terms.”

As such CCN welcomes the proposals as set out here, envisaging a careful process which ensures the welfare of children in the system is central, but attempts to pursue implementing reform as soon as is possible, given legislative considerations.

20. Our research during this consultation period, however, has shown some significant splits in opinion from across local authorities over the pace of change set out in these proposals. On the one hand some felt that even ten years may be ambitious in resolving so many problems in the system:

“The proposed timescales for implementation significantly underestimate the practical realities of delivering reform at scale within local systems.”

21. Whilst others, perhaps recognising the pressure their authorities are under now, were concerned that change would not come soon enough:

“The timeframe is too slow and the recognition that by 2035 we will be back to the same levels of EHCPs as 2026 means we are not really addressing the demand and financial pressures in the system.”

“The system is under significant pressure now, and the reforms as currently sequenced will not deliver improvements quickly enough to make a meaningful difference in the short to medium term.”

⁷ Send in England: How we got to crisis point and why we need reform of the system (ISOS Partnership and CCN, 2025)

22. Many authorities mentioned the bandwidth available to councils at present to be able to focus on such important reforms:

“I agree we need a long term 10-year strategy but the substantial amount of work required in year one is far too ambitious and does not take into account that we are also implementing BSIL, Families First, Schools White Paper, reductions in the ICB, it is stretching services and partners beyond its capacity.”

23. For some CCN member councils the picture is complicated even further by local government reform (LGR) taking place during the same timeframe, which may see SEND services disaggregated and reconstituted in some areas.

“While reform is necessary, the scale and timing of concurrent reforms adds significant complexity. Changes to Integrated Care Boards, Local Government Reorganisation and SEND reform are all happening at once, reducing capacity in key partners and increasing delivery risk if alignment and sequencing are not carefully managed.”

These concerns regarding the impact of LGR are significantly heightened by the recent decisions to disaggregate services in Hampshire, Norfolk, Suffolk and Essex into multiple smaller unitary councils, at odds with the government’s statutory criteria.⁸ CCN research has extensively demonstrated that excessive fragmentation and disruption to people services such as SEND could weaken service outcomes, lead to workforce capacity and recruitment challenges, and increase the costs of delivering services.⁹ Recent decisions in those four areas, and if repeated in remaining two-tier areas where decisions haven’t been taken yet, could significantly undermine the successful implementation of these reforms over the coming period.

24. Of further concern to many officers in CCN member councils was the speed at which SEND Reform Plans are expected to be developed. With limited understanding of the ‘Experts at Hand’ scheme and the funding which will be made available longer term beyond Phase One, it was felt that developing a full strategic plan for reform was unrealistic:

“The amount of planning time given to co-produce a plan is very limited, when considering the number of partners needed to be able to produce it. In addition, without specific guidance or further information on e.g. funding, it is difficult to develop a detailed plan of action.”

25. These issues are compounded by uncertainty around whether councils at present have the resources to build the new system while still carrying the legal, financial and demand pressures of the current one given local authorities will need capacity for programme management, data, co-production, communications, workforce development, and evaluation, not just frontline delivery.

Tiered Support

26. CCN supports the proposal to move to a new tiered system of support through ‘targeted’, ‘targeted plus’, and EHCP. The present system of ‘SEN Support’ has proved over the past decade to lack the nuance to properly accommodate expectations for how the system can

⁸ <https://www.countycouncilsnetwork.org.uk/local-government-reorganisation-decisions-ccn-responds/>

⁹ Newton – Local Government Reorganisation – analysing the impact on people services (2025)
<https://www.countycouncilsnetwork.org.uk/download/6113/?tmstsv=1778154190>

meet the increasingly complex and diverse range of needs within the system compared to 2014, a contributing factor in making an EHCP appear more desirable given its statutory status. The new 'tiers' will provide greater clarity and expectations of the roles and responsibilities of the mainstream and specialist education sectors respectively. CCN believes this will create improved conditions for partnership working and breaking down silos between the two – a key recommendation in Isos Partnership's recommendations in 2024:

“Our research suggests that there is a strong consensus for moving away from thinking about SEND as a separate system, and towards an approach to meeting children and young people's additional needs through a more inclusive conception of education.”

27. It is hoped that this proposal will allow staff, expertise, and support to move more fluidly between mainstream and special education. It will also help ensure children can move more easily between the two as their individual needs fluctuate or are ameliorated. Our research has shown that on balance outcomes continue to be substantially better for children remaining in mainstream school rather than in special education, therefore the overall aim and incentives should always be geared towards trying and include children in the mainstream system wherever possible – and sometimes a blend of the two.
28. Whilst the principles of the new approach are welcome, the government must ensure that the funding mechanisms are both adequate to meet demand and incentivise inclusion (as opposed to concerns the present 'notional SEN budget' system does not). The consultation on the redistribution of the High Needs Block going forward into the new system will be crucial in this regard – and CCN urges the government to set out its proposals on this matter as soon as possible so that local authorities and schools alike are clear on not only how they are expected to work together in the new system, but with what resources they will have in order to do this.

Local authority role and 'Experts at Hand'

29. The proposed role for the local authority delivering 'Experts at Hand' services is welcomed by CCN and its member councils generally. When asked in the survey what were felt to be the most positive aspects of the proposed reforms, several councils responded mentioning this:

“Increase in 'experts at hand' - early support to prevent escalation of need and increase confidence in school staff.”

“The strengthened focus on early intervention, and the investment in mainstream capacity, including the Experts at Hand offer.”

“...an emphasis on mainstream inclusion, supported by all the proposals linked to allocation of resources and the support mechanisms that are proposed, should make a big difference. The Experts as Hand proposal will be part of this.”

30. However, councils are concerned that even with the significant investment being made during Phase One fully resourcing this service in the short term may be difficult until initiatives such as the investment in training educational psychologists are fully realised:

“The concept of ‘Experts at Hand’ is sound, but we are concerned about where the increased number of professionals to create these teams will come from. There are already shortages of some therapists and other professionals.”

“[A] significant issue is the availability of specialist expertise. The proposals assume increased capacity, yet the current system already faces shortages of educational psychologists, therapists, specialist teachers, and mental health professionals. Recruitment and retention difficulties raise questions about how this expanded workforce will be developed at the scale and speed required.”

Legal rights and changes to the Tribunal

31. CCN welcomes measures to rebalance the Tribunal system. The proposed new system of ‘specialist packages’ will come with clear expectations of levels of support and price bands which it is hoped will make it far clearer what placement will be able to meet a child’s needs and at what cost. At present without this clarity Tribunals can overrule local authority decisions and name a specific placement – which can be a vastly more expensive place in an Independent school – and often seemingly without reference to whether this is an “effective use of resources” for the local authority (including HTST costs). The proposed scope of the Tribunal strikes a better balance between the need to challenge processes against the wider expectations of local citizens for their local authority to budget responsibly.
32. It is hoped that the planned increase in state specialist places over the coming years will also help to reduce pressure on the Tribunal by increasing the choice available to families of placement. CCN believes the new ‘specialist packages’ set out will make it clearer to families and local authorities alike from the outset which local schools can and can’t meet a particular child’s needs, as well as strengthening the ability of local authorities to direct schools, particularly Academies, to admit a child with SEN needs if they have stated that they can deliver the right specialist package of support.
33. CCN also welcomes the proposal to extend legal rights to all children receiving SEN services at whatever tier (to roughly 20% of pupils compared to c5% now). It is hoped this will solve significant problems either in assessment of need, or finding an appropriate placement for a child at an earlier stage, increasing the chances of SEND needs being better identified and addressed early and reducing the risk of need escalating into an EHCP further down the line.
34. CCN supports the retention of the legal principle ‘presumption to mainstream’ which means children seeking ‘specialist packages’ with an EHCP will continue to receive significant preference over school admissions in the proposed new system. It is right that where a child’s needs may limit access to the full range of schools within a local catchment area, that this should allow for greater educational choice for these families.
35. CCN welcomes the guarantee that all children with an EHCP at the point the new system comes into effect in 2030 will retain it until the end of the phase of education they are in at that point. This reflects the need for change to take place gradually to avoid adversely affecting the education of children already secure in an education placement as was recommended in Isos Partnership’s 2024 report for CCN.

Partnership working

36. Whilst the consultation is clear that effective SEND reforms will require a partnership working approach across schools, health, and local authorities, accountability will be important. It is vital that the new system ensures each partner agency is held accountable for their responsibilities within the system.
37. As noted earlier in this response, the new proposals for the tiered system of support promises to create clearer expectations and responsibilities for schools and local authorities over their roles. Additionally, CCN welcomes the changes to Ofsted's School Inspections Framework last year to place greater emphasis on inclusion as recommended in Isos Partnership's 2024 report following evidence that this has proved a contributing factor to some of the dysfunction in the present system:

“Several participants highlighted that a powerful disincentive to being fully inclusive in the early years is the perception that the current Ofsted early years inspection framework prioritises evidence of excellent behaviour and children's progress in meeting the early learning goals over inclusivity.”

38. CCN is confident therefore that the new system will better promote strong partnership working between schools and local authorities with clearer roles and responsibilities for each as well as helping fuse mainstream and specialist education more closely together and reduce silo-ed working.
39. However, there is less confidence among local authorities that health will have the capacity, or be significantly incentivised, to prioritise their role as a key partner in delivering SEND services. This is a particular concern given the extensive changes currently underway in the sector:

“Significant cuts to ICB headcount and funding in recent years have materially reduced the health system's capacity to show up as a genuine partner in SEND. It is very difficult to build an integrated, multi-agency response to children's complex needs when one of the three key partners has seen its infrastructure substantially reduced... The risk is that SEND reform becomes something education and local authorities are expected to drive, while health participates at the margins rather than as an equal and accountable partner.”

“...there are significant pressures within the Integrated Care Board (ICB), particularly around capacity, waiting times and the availability of specialist health services. Much of the success of the SEND reforms relies on timely, coordinated involvement from health partners, and current challenges within the ICB create uncertainty about the system's ability to meet the increased expectations placed upon it.”

40. There was therefore support for full accountability on all partners as too often local authorities have felt in the present system that they are too often held responsible for all failures in SEND delivery, without the ability to ensure that other partners are delivering their contribution:

“[Our council would like to see] legislation that makes health, education and other partners individually accountable, not just the LA as the default legal backstop.”

Local authorities forming school trusts

41. In a survey on this consultation with responses from 54 local authorities from across England, there was significant difference of opinion on the proposal for local authorities to create their own groupings of schools under the Trust model going forward, as set out in the Education White Paper with responses for 'positive', 'neutral', and 'negative' each receiving a third of the poll. CCN feels that far more detail of what this proposal will actually entail is needed before it can support this move – particular given the lukewarm response that a similar, later abandoned, proposal was given in the previous government's Schools Bill a couple of years ago.

"...most of our schools are already trusts and there is no council capacity to develop a local authority trust for remaining schools – we are unsure of the expectations of this or timescales or whether there is any funding to support this.

Future funding structures for local authorities

42. CCN has previously welcomed the Government's announcement at the Budget in November 2025 that they would be taking on the costs of funding SEND centrally from the point the Statutory Override expires in March 2028. However, the consultation does not set out clearly how this is going to happen in practice. This is creating uncertainty over how far funding for the new system will be sufficient to meet demand.

"The overall funding envelope and how it breaks down for schools and LA's is not yet clear and may not be sufficient."

43. Further the consultation states that:

"Future funding for local authorities will aim to cover SEND costs, so that where local authorities are managing their system effectively they will not need to use general funds."

It is not clear at this stage how it will be determined whether local authorities are 'managing their system effectively'. Local authorities are acutely aware that previously Ofsted and CQC joint SEND inspections have failed to take resource limitations into account fully when assessing local authority performance around SEND, even despite the documented pressures which are now recognised have been facing the sector for most of the time these inspections have existed.

"The announced funding does not adequately resolve the cost of maintaining the current statutory SEND system whilst enabling the fundamentals of a future model. This then, leads to dichotomy in meeting statutory duties and investing in reform."

44. The consultation confirms that the local authority role in SEND going forward (which appears likely to remain considerable) will continue to be funded by a reformed High Needs Block (which the document states will be consulted on at a future time). To many councils this nominally seems the same mechanism as used at present which has led to the build up of deficits. **It is imperative that the position councils have found themselves in during this decade is never permitted to happen again** and clear plans for funding of local authorities during the transitional period and beyond need to be defined more fully as soon as possible.

Future high needs block deficits

45. CCN strongly welcomed the recent announcement earlier this year that 90% of existing deficits up to 2026 will be absorbed by government. CCN has long advocated on this issue and the commitment will make a material difference to many of our member councils and indeed authorities beyond which were facing potential collapse.
46. That is not to say that the remaining 10% debt does not present significant challenges for some councils, as well as impacting on the present accounts in the way of increased interest payments. Clarity is needed urgently over what will happen for the remaining balance of deficits accrued between March 2026 and 2028 when the Statutory Override ends.
47. This is a particularly important issue given that the research that Isos Partnership has conducted with local authorities during the consultation period has found that councils up and down the country are seeing significant rises in applications for EHCP assessments since the reform proposals have been announced:

“We have experienced substantial increases in requests for EHCPs (100% in the month of Dec alone compared with the previous year)”

“There will be no mainstream inclusion increases in the next 3 years and a huge build up in EHCPs needed to be placed in specialist places. This will have a knock on effect for 5-7 years.”

It is likely that this may lead to continued increased demand for EHCPs in the coming years before the reforms come into effect fully – a point which the consultation itself acknowledges by projecting this will not return to its current level until 2035. As such there is concern that accumulated deficits will be larger than previously projected at the point that the statutory override ends in March 2028. This is likely to impact on local authority budgeting and planning over the next two years and the government is urged to provide certainty over how much liability councils are expected to be exposed to at this point as soon as possible.

Home to School Transport (HTST)

48. CCN report in February 2026, [Home to School Transport: How SEND reform can make services sustainable](#) showed that councils in England are on course to be transporting over 100,000 more young people with SEND to school by the end of the decade, with costs projected to rise from the £2bn last year to £3.4bn by 2030/31. CCN research has shown that growth in SEND Transport costs are closely correlated with the rise in EHCPs.¹⁰

This is a significant and growing pressure on council budgets, but one that is met from a local authority’s wider funding, not devolved through the Designated Schools Grant (DSG). Local authorities have worked hard to reduce the costs of HTST, but their efforts have mainly had to be focussed on adjusting and replanning mainstream HTST services. The primary driver of costs is the growth in SEND HTST and due to the increase in EHCPs with statutory entitlements it is substantially more difficult to address this spending burden.

In particular, Isos Partnership research for CCN has highlighted the growth in individualised

¹⁰ <https://www.countycouncilsnetwork.org.uk/download/6361/?tmstv=1778487098>

forms of transport such as taxis since the pandemic – showed that “*use of cars, including taxis, to transport children with SEND to school increased by 36% from 2019 to 2023*”. This was estimated to translate into just over 30,000 children in CCN member authorities needing this form of transport, rivalling the numbers transported by minibuses for the first time.

However, despite SEND HTST being the key driver of the 106% rise in costs for providing this service over the past decade, the consultation does not explicitly mention Home to School Transport (HTST). CCN accepts that if the reforms set out in the consultation are implemented effectively, this should reduce demand for specialist SEND placements long distances from a child’s home and community – and consequently spending on HTST. However, the government admits that its plans will take a decade to implement and the burden on councils of rising HTST cannot be borne indefinitely. With the new system not phasing in until 2029 and given our recent research findings, clarity is urgently needed over how this pressure – which falls most heavily on CCN member councils – will be addressed.

“This is not a peripheral issue. It is a financial time bomb sitting underneath the reform programme, and it deserves dedicated legislative attention, not just a footnote.”

APPENDIX A – CCN Latest Research and Figures

In November 2025 CCN published *SEND in England: How we got to crisis point and why we need reform of the system*. Its key findings included:

- Since the Children and Families Act 2014 was introduced, the number of students on EHCPs has more than doubled nationally from 240,000 in 2015 to 638,000 in 2024/2025. It is projected that the number of EHCPs is on course to reach almost 840,000 by the end of this Parliament – up by 32% in just four years.
- This surge has driven councils to increasingly rely on expensive private school places, which have risen 165% since 2015 and the total number of 34,000 pupils is almost one in five special school placements. With the yearly average cost of these independent and non-maintained private school placements set to reach £72,000 per pupil compared to £10,000 in a mainstream school by 2029, councils are on course to be spending £3.2bn a year on private school placements for young people with EHCPs.
- High-needs expenditure by councils had already reached £12.2bn last year – treble the amount prior to the 2014 reforms. It is projected to reach £16.8bn by the end of the parliament.
- **Despite investing over £30bn more over the last decade neither educational outcomes nor family satisfaction with the system have improved.** The percentage of GCSE students with EHCPs achieving Attainment 8 in 2025 is 14% – roughly the same as in 2019 and lower than the number achieving Attainment 8 in 2021. In addition, the percentage of 19 year-olds with EHCPs who attained Level 2 (equivalent to five GCSEs) is 30% – a decline from 37% of young people a decade ago.
- **Councils are increasingly having to take money from mainstream schools to prop up SEND services, whilst losing hundreds of millions each year in servicing high-needs deficits.** The report reveals that last year £150m, largely from mainstream schools, was re-routed to the local authority's high needs budget. Councils are also losing £326m per year in lost interest and debt service charges from rising deficits – a figure that could reach almost £1bn by the end of the Parliament if they are not wiped.

APPENDIX B – new ISOS Partnership research on Consultation Proposals commissioned by CCN and LGA

CCN's consultation response contained the text of the report, *Send Reform: An independent analysis of the impact on local government* – written by Isos Partnership and commissioned by CCN in partnership with the Local Government Association (LGA). This report has been published separately to this consultation and can be downloaded from CCN's website.

APPENDIX C – CCN PUBLICATIONS ON SEND

- **Home to School Transport: How SEND reform can make services more sustainable**
(CCN, 2026)
<https://www.countycouncilsnetwork.org.uk/download/6361/?tmstv=1778487098>
- **SEND in England: How we got to crisis point and why we need reform of the system**
(ISOS Partnership and CCN, 2025):
<https://www.countycouncilsnetwork.org.uk/download/6179/?tmstv=1763100695>
- ***Towards an effective and financially sustainable approach to SEND***
(ISOS Partnership, CCN and LGA, 2024):
<https://www.countycouncilsnetwork.org.uk/download/5402/?tmstv=1737037930>
- ***From home to the classroom – making school transport services sustainable***
(ISOS Partnership, CCN, 2023)
<https://www.countycouncilsnetwork.org.uk/download/5114/?tmstv=1737037930>
- ***Policy In Focus: Virtual schools – education’s hidden asset* (CCN, 2023)**
<https://www.countycouncilsnetwork.org.uk/download/5011/?tmstv=1737037930>
- ***SEND Green Paper – CCN’s Consultation Response* (CCN 2022)**
<https://www.countycouncilsnetwork.org.uk/download/4380/?tmstv=1737038373>
- ***Home to School Transport – the challenge in counties* (CCN, 2022)**
<https://www.countycouncilsnetwork.org.uk/download/4147/?tmstv=1737038459>
- ***CCN Analysis – SEND: the challenges facing counties* (CCN, 2019)**
<https://www.countycouncilsnetwork.org.uk/download/2314/?tmstv=1777479203>
- ***CCN Analysis – SEN Home to School Transport* (CCN, 2018)**
<https://www.countycouncilsnetwork.org.uk/download/1872/?tmstv=1777479206>