

# About Together Trust

Together Trust is a charity that provides care, specialist education, and support to vulnerable children, young people, and adults across the North West. With over 150 years of experience, we support around 3,000 individuals annually through over 40 services—including registered children's homes, specialist education, mediation, fostering, SENDIASS, and short breaks—we are committed to championing their rights, needs, and ambitions.

## Summary

\*Please note that, in our response, we will use the term **SEND** rather than **SEN**, as our research included the wider cohort.

Our response is informed by insights from staff across our education and community services, as well as our joint research with National Star charity, [What Comes After Education for Young People with SEND](#). Launched in 2023, the research aimed to explore barriers to meaningful adult lives. Between November 2023 and February 2024, we conducted two surveys—one for children and young people with SEND (ages 14-25), and one for parents and carers – gathering over 400 responses. References to 'our survey' refer to this project.

In summary, our response calls for stronger local authority (LA) accountability to uphold SEND legal entitlements and a robust DfE strategy to adapt the school system. Urgent action is needed to ban illegal settings, with collaboration between the DfE, Ofsted, and Ministry of Justice. Amongst other things, we advocate for an 'active offer' in independent advocacy, better funding for mediation and SENDIASS, and solutions to workforce shortages. Early, long-term planning is crucial for smoother transitions into adulthood, with stronger multi-agency collaboration and person-centred planning. Increasing investment in specialist education, and ensuring tailored funding decisions are key. Innovative, multi-agency solutions are essential for personalised support.

## Response

### **Assessing the current quality of SEN support in mainstream schools and early years settings.**

Evidence gathered from our community services, highlights fundamental flaws in the current approach to supporting children and young people with SEND in mainstream schools. While the legislative framework sets expectations from early years through to secondary education, the reality is that many schools are struggling to meet the needs of children at the SEND support level. The core issue lies not just in the provision of adjustments, but the systemic failure to create genuinely inclusive environments.

Despite schools making significant efforts to implement reasonable adjustments and innovative support strategies, there remains a disconnect between these efforts and

their effectiveness. There are schools which are going above and beyond with creative solutions, yet they still find that these measures are insufficient. The key barrier is that the broader school environment is often unsuitable for many children with SEND, regardless of the accommodations made. The expectation that all schools must accommodate all children, without a robust and proactive strategy to develop SEND-friendly environments, places an unrealistic burden on schools, particularly at the secondary level.

Another key issue is the discrepancy between the EHC plans and the actual support a child receives. Children with EHCPs may be assigned a specific number of additional 1:1 support hours, but schools often struggle to provide the full support required due to insufficient resources. As a result, some children are placed on part-time timetables, meaning they are technically "in school" according to LA records but are not attending full-time.

This situation can often go unnoticed by LAs, as the data around part-time timetables is not always visible or adequately tracked. The lack of accountability or a clear way for LAs to monitor this issue can result in children not receiving the full education they are entitled to under their EHC plans. Furthermore, for families, the consequences of a child being excluded from school, even part-time, can be significant. Working parents may struggle to maintain employment, leading to financial instability and a reduced sense of security for the whole family.

*Recommendations:*

- Acknowledge that mainstream education will not work for a significant percentage of students with SEND.
- The system must provide a continuum of provisions, including specialist schools, rather than forcing students into ill-suited environments.
- There is a need of a more robust system of tracking and accountability to ensure that children with SEND receive the support they are legally entitled to.

## **How can inclusivity and expertise in mainstream schools and early years settings be improved to achieve consistent, high-quality SEN support? What is the DfE's role in this?**

The DfE and government haven't implemented a robust strategy to enable the whole school system to be adapted to the increasing and evolving needs of students with SEND. Instead of a proactive, well-structured plan, schools are left responding reactively — forced to make piecemeal adjustments as children with specific needs seek placements. This reactive model results in inconsistency, variability in support quality, and additional strain on schools and families.

### *Recommendation:*

- The DfE should implement a robust strategy to enable the whole school system to be adapted to the increasing and evolving needs of students with SEND. Instead of waiting for children to request placements, schools should be systematically prepared to accommodate different needs as standard practice.

## **Outcomes for children and young people with SEND and how these can be improved.**

**Safety of children and young people:** Children and young people with SEND must never be placed in unregistered accommodation—illegal settings without regulatory oversight. Our 2023 investigation with *The Observer* found over 700 children in England living in such settings without independent Ofsted oversight.

In April 2024, we sent a joint letter to the Secretary of State for Education, alongside other charities, highlighting the rising use of illegal accommodation for children in care, including those with SEND, and calling for urgent reforms.

While the DfE plans to strengthen Ofsted's enforcement powers, we remain concerned about the safety and welfare of children and young people until these illegal settings are identified and addressed. Urgent action is needed.

### *Recommendations:*

- Publish details of how the DfE will work with Ofsted and the Ministry of Justice to end the use of unregistered, illegal accommodation for all children.
- Publish a sufficiency and workforce plan that cuts across the children's social care system and increases the number of safe and caring homes for all children.
- Commit to all children in care receiving regulated care up to age 18, in line with the recommendation of the Children's Social Care Review
- Enforce the recommendations of the Child Safeguarding Practice Review Panel and ensure robust joint inspections by Ofsted and the CQC to improve accountability and protect vulnerable young people.

## **‘Active offer’ to independent advocacy**

### *Recommendations:*

- Introduce an **‘active offer’** of independent advocacy, **instead of ‘opt-out’**, for children, young people with SEND, and their families. The suggested term will ensure professionals consistently communicate the availability of advocacy services, always making support accessible.
- Ensure advocacy services facilitate referrals to key resources, including SENDIASS, therapeutic support, ensuring access even for those without an EHC plan.

**Enhance regular access to meaningful activities:** There is a strong focus on employment for young people with SEND, but less emphasis on meaningful activities and maintaining peer relationships. In our [survey](#), some parents and carers highlighted the importance of these activities, especially for young people experiencing anxiety or pressure around work. For those unable to engage in paid or voluntary work, regular social and community activities are vital for inclusion and well-being, yet demand often exceeds supply.

### *Recommendations:*

- Funding and regulation should prioritise creating meaningful, user-driven services.
- Involving families in shaping these services ensures they meet real needs, while allowing full-time caregivers opportunities to re-enter the workforce.

**Support to access university:** Under the **Equality Act 2010**, universities are legally required to make reasonable adjustments to ensure disabled students are not disadvantaged. However, [UCAS](#) evidence reveals that young people with disabilities are “*up to 28% more likely to defer than their non-disabled peers,*” a gap that has widened since the pandemic.

### *Recommendations:*

- It is essential for Further Education (FE) providers specialising in SEND to collaborate with universities to facilitate smoother transitions for students with SEND into higher education.
- Adequate funding and resources must be allocated to support these partnerships, promoting equity in access and empowering students to achieve their ambitions.

**Access to work and reforming the benefits system:** The UK has a large disability employment gap. At the end of 2023, it stood at [27.9%](#). Employment benefits young people with SEND, their families, and the economy, but the current benefits system discourages work by making individuals financially worse off. Additionally, lack of

awareness about programs like Access to Work hinders participation, and these programs need to be streamlined and made more accessible.

During our joint project with National Star, many young people expressed a desire to work. Some sought experience in specific industries like TV, gaming, or working with people with disabilities, while others valued the sense of self-worth from long-term voluntary roles. Supported internships also provided meaningful opportunities for gaining experience.

*Recommendations:*

- Implement a cross-departmental government initiative to enhance employment and training opportunities for young people with SEND.
- Reforms should ensure the benefits system supports disabled young people entering the workforce, particularly those needing job mentors, reasonable adjustments, or long-term support.
- A compassionate approach is needed for individuals with lifelong conditions, reducing unnecessary reassessments, which put immense pressure and fear to young people with SEND.
- The guarantee of legacy benefits needs to be re-enforced and communicated to ensure that disabled young people who want to work can do so, and those who are unable to work are not labelled as 'scroungers' off the state.

**Workforce issues for teachers, SENCOs, specialists, early years practitioners and all those who work with children with SEND.**

Staff in our community services report that years of funding cuts have hampered schools' ability to support SEND children, while LAs are overwhelmed and lack capacity for necessary assessments. Improved structures and funding for schools and LAs are essential to provide timely and effective support.

The **SENCO** role is undervalued, with many stretched across multiple schools, making it difficult to provide effective guidance. The shortage of **educational psychologists** contributes to delays in assessments, causing further challenges for children with SEND and their families.

**Mediation services** are understaffed, despite their vital role in resolving disputes between parents and LAs. Effective mediation can prevent cases from escalating to the SEND tribunal, saving LAs time and resources, while benefiting families by offering a supportive, face-to-face or virtual space for conversations. This service is crucial for improving relationships and resolving disagreements in a mutually beneficial way.

Also, **SENDIASS** teams, which provide critical guidance, are also understaffed and undervalued. Investment in SENDIASS is essential to improve their capacity to support families. Feedback we get from both parents and professionals highlights the value of SENDIASS in providing clear, consistent support, helping families feel heard and supported through challenging processes. Given that most SENDIASS services

are run by LAs, there is a need for independence to ensure impartial support and accountability.

*Recommendations:*

- Ensure that SENCOs have a standalone, full-time position with adequate time, resources, and support to fulfill their statutory duties and provide effective guidance.
- Invest in training and recruitment to alleviate the shortage of educational psychologists, ensuring timely assessments and reducing delays in supporting children with SEND.
- Provide adequate funding and staffing for mediation services. Mediation should be strengthened as a preventative tool to avoid escalations to SEND tribunals, saving both time and resources for LAs.
- Ensure SENDIASS services are properly funded and staffed to meet the growing demand for support. Strengthening these services will provide families with the consistent, clear guidance they need throughout complex processes.
- Ensure SENDIASS services are independent, so that they remain impartial, safeguarding families' access to unbiased support and guidance.

## **The role of and capacity of specialist schools, independent schools, and Alternative Provision.**

Our answer focuses on the role of specialist schools.

Specialist education settings are crucial for neurodiverse students whose needs cannot be met in mainstream schools. Mainstream environments often lack the support needed for students with sensory, communication, or social challenges. Pushing for more mainstream placements, risks worsening these issues for students who require more structured settings.

Our specialist school supports neurodiverse students working at age-related academic levels but facing challenges like communication difficulties, sensory processing issues, and severe anxiety. Despite their academic abilities, many have complex disabilities. A [National Autistic Society](#) survey found 47% of autistic people fall into the severe anxiety category based on GAD diagnostic criteria.

LAs often resist funding specialist placements, assuming mainstream schools are sufficient based on academic abilities. This overlooks underlying needs, leading to inadequate support, worsened mental health, increased school avoidance and social isolation. Addressing these needs is crucial for improving wellbeing, educational experiences, and employability for children and young people with SEND.

### *Recommendations:*

- Increase investment in specialist education settings that educate neurodiverse students.
- The government's approach must be more nuanced, considering the varied and complex needs of neurodiverse individuals. This includes prioritising funding that supports students with high sensory, communication, or social needs, and ensuring that such support is available earlier in a student's education to prevent the escalation of mental health issues and school disengagement.
- Funding decisions should be based on individual needs of children and young people, rather than being constrained by budgetary limitations.

### **How can waiting times for EHC Plans be improved?**

The delays in EHC plan processing stem from severe capacity issues within LA teams and specialist services. EHCP coordinators are overwhelmed, often handling caseloads of 400+ families, making meaningful communication with parents nearly impossible. This lack of engagement leads to avoidable disputes, escalating cases to mediation and tribunals rather than resolving them earlier in the process.

A key issue is the expectation that schools provide robust SEND support and evidence before an EHCP application. However, without sufficient funding, training, and resources, schools struggle to meet this requirement, causing further delays in needs assessments.

Additionally, a national shortage of educational psychologists is a major issue. Some LAs resort to expensive private assessments.

### *Recommendations:*

- Invest in EHCP coordinators and ensure manageable caseloads to improve communication and efficiency.
- Boost recruitment, training, and funding for educational psychologists to meet statutory assessment requirements.
- Improve support for schools in gathering SEND evidence to reduce delays in needs assessments and EHCP approvals.

### **What can be done to support parents, carers and children or young people before, during and after the EHC Plan process?**

LAs must uphold their legal duties under the Children and Families Act 2014 and SEND Code of Practice. Delays, inadequate assessments, and failures to provide appropriate support leave families fighting unnecessary battles. Parents should not have to navigate a complex system alone, or resort to legal action just to secure their child's rights.

*“We often speak to families who are so stuck because their child is either excluded from school or unable to attend a mainstream setting, despite the school's best efforts. However, a specialist setting often isn't the right fit either, leaving no interim solution. These children typically undergo a needs assessment, receive an EHCP, and are often placed in an EOTAS package, but LAs are hesitant to approve these due to their variability, making the process unclear and difficult for families. This leaves parents fighting for appropriate provision, and children often become isolated, even if their educational needs are met, as they are removed from their peer groups and communities”. - **staff member***

*Recommendations:*

- More flexible, interim solutions are essential, rather than forcing families into a one-size-fits-all EHCP process. It is crucial to address this grey area, and that goes all the way up to post-16 and beyond.
- Invest in support beyond education, to prevent these children becoming isolated.
- Invest in independent SENDIASS services so that families have access to clear, reliable information at every stage of the EHCP process.

### **How does SEND provision vary between local areas and what can be done to promote consistency of approach?**

*“It does seem to come down to how much money is in the budget, rather than what is right for the young person...” – **staff member***

SEND provision varies widely across local areas due to disparities in LA funding and resource allocation. Despite centralised statutory frameworks, the quality of support often depends on local budgets and priorities, creating a postcode lottery where access to education and support for children with SEND varies drastically based on location.

*“At a recent open evening, parents shared that securing appropriate support for their children often feels like an ongoing battle. Information about services is fragmented and difficult to navigate, especially for families where parents may be neurodiverse or have disabilities. The lack of clear, consistent, and accessible guidance leaves many feeling overwhelmed and unsupported”. - **staff member***



SEND provision across educational settings also lacks consistency. The quality of education and care varies widely, with some settings failing to meet minimum standards, or prioritising profit over the needs of young people. Unregistered and inadequately regulated settings further exacerbate these disparities, leaving families uncertain about the quality of care their children will receive.

*Recommendations:*

- Allocate funding based on the needs of children and young people with SEND, not LA budgets, to eliminate the postcode lottery and ensure equal support across regions.
- Centralise and simplify SEND service information with clear, user-friendly resources accessible to all families.
- Foster collaboration between LAs and educational settings to share and implement best practices nationwide.

**How can multi-agency and joined up working across education, health, and social care be improved?**

Evidence gathered from staff in our education services reveals a lack of meaningful involvement from all relevant agencies in the EHCP process. This causes a delay in early intervention which leaves young people without adequate support, sometimes restricting their ability to engage with their communities and access essential services.

Also, the LAs which are responsible for EHCPs, often fail to update plans or attend review meetings unless significant transitions, such as moving between key stages or into adulthood, occur. Even in these instances, attendance is inconsistent, particularly when a young person is perceived to be "doing well." This lack of ongoing engagement sends the message that the ongoing needs of young people are not prioritised.

Moreover, in cases where LAs attempt to cease an EHCP, there is often pressure placed on families and young people to transition solely to social care. This approach fails to consider the full range of needs across education, health, and social care, which further hinders the overall well-being and prospects of the young person.

*Recommendations:*

- Adequate funding must be secured for all agencies—education, health, and social care—to fulfil their responsibilities within the EHCP process.

- Require consistent participation from all relevant agencies in EHCP reviews, regardless of the perceived progress of the young person. This includes ensuring adherence to statutory responsibilities as outlined in the SEND Code of Practice.
- LAs must be held accountable for ensuring compliance with the law and providing a truly integrated approach to support a young person's future.

## **What steps should be taken to improve the post-16 landscape for students with SEND? What reforms are needed to ensure all post-16 qualifications meet the needs of students with SEND?**

**Follow the law and plan early:** The Children and Families Act 2014 was designed to support young people with disabilities and their families from birth to adulthood. From Year 9, EHCP reviews must prepare for adulthood, focusing on education, employment, independent living, and community inclusion.

Our [survey](#) showed that nearly half (45%) of young people did not have a plan in place for leaving education. This may be either due to the absence of a transition plan or being unaware of existing plans. Either scenario is unacceptable. Also, 4 in 5 parents (80%) did not know what was supposed to happen when their child left education.

### *Recommendations:*

- Transition planning should start early, with collaboration between children's and adult services to ensure tailored provisions and effective resource allocation at local and national levels.
- Legislation, including the SEND Code of Practice 2015 and Children and Families Act 2014, must be consistently applied, with young people actively involved in their plans. LAs must prioritise person-centred approaches, placing young people and their families at the core of decision-making. Empowering them to shape their futures is a fundamental right.

**Place young people at the heart of the process:** Every young person with SEND leaving education should feel optimistic about their future. However, our [survey](#) reveals that 55% feel worried about the transition process, and 33% experience loneliness.

The transition process must be consistent across England, offering clarity and transparency to reduce anxiety, establish clear pathways for success, and provide supporters with the information needed to uphold the rights and aspirations of young people with SEND.

### *Recommendation:*

- Services must be shaped by those with lived experience. Children and young people with SEND should actively participate in planning and decision-making, ensuring their transition to adulthood is meaningful and empowering.

**Ensure choice through flexible and sustainable funding:** Children and young people with SEND must have the option to live locally or out of county, based on their needs. However, 66% of parents and carers in our [survey](#) reported that their young person didn't achieve their desired outcomes—housing being a key factor.

*Recommendations:*

- Central government, LAs, and providers must work together to develop flexible, long-term services that focus on meaningful outcomes for young people with SEND.
- Children, young people and their families should be central to this process, ensuring services align with their needs and aspirations. When young people cannot lead these decisions, families and carers must be empowered to advocate on their behalf, ensuring their voices are heard and respected.

**Qualifications:** Staff at our specialist college have shared concerns about the lack of recognised accreditation for students with varied abilities, despite their development of valuable skills. As a staff member put it: *“We give them awards and certifications, but they don't receive any recognised accreditation. That is where there is a gap”*.

There is a significant need for formal accreditation that acknowledges the skills and achievements of students with SEND, even those with lower academic abilities. Many of these students possess valuable skills and can be very capable, yet without recognised qualifications, it can be unclear what their next steps are once they leave college. While vocational qualifications are often seen as the logical next step, some of our students may not have the necessary academic qualifications to enter certain courses, even though they could practically excel in that. This highlights a gap in the system.

*Recommendation:*

- There is a need for post-16 qualifications that not only cater to the academic needs of SEND students but also their vocational skills.

## **What steps can local authorities take to ensure funding for post-16 SEND transport needs?**

While the 2015 SEND Code of Practice requires transport for statutory school-age students, post-16 transport applications often face delays. At our specialist college, some students' transport was processed as late as October or November, causing missed education and added stress for families. Other FE providers reported similar issues at a transition event.

Although transport isn't statutory for those over 19, many SEND students continue education until 25 under EHCPs, making statutory transport support essential. Specifically, staff in our specialist settings have reported instances where LAs informed parents in the summer that transport funding would be withdrawn, despite children already securing school places, causing significant stress, particularly for working

parents. While these issues were eventually resolved, the battles parents face to secure essential support exacerbate their existing challenges.

*Recommendations:*

- Transport provision should be statutory up to 25, aligning with EHCP support.
- Sufficient funding must be allocated for post-16 transport.
- LAs must process post-16 SEND transport applications promptly to prevent education delays.

## **How can innovation address current pressures and challenges?**

Living close to their local area is a key factor in ensuring young people are supported in a way that fosters inclusion and independence. Over half (51%) of young people in our [survey](#) reported not living in a place of their choice. LAs and commissioners must prioritise innovative, collaborative solutions in housing and services for disabled young people.

Linden Farm exemplifies the importance of collaboration between parents, local communities, and councils in finding solutions for children and young people with SEND. Specifically, the parents of a young disabled person fuelled by a desire to have their son live closer to them, they refused the council's offer of a placement in either Yorkshire or Cornwall, due to a shortage of provision, and along with other local parents, set up the Simon Trust. The Trust took a creative fundraising approach, raising £300,000 to contribute to the project and ensure features like bespoke kitchens and sensory rooms were included. The council provided land, funded construction, and sourced and trained care staff. Residents live as tenants, with the autonomy and rights that come with a rental agreement, ensuring stability and independence.

Decision-makers should prioritise listening to the voices of families and work together to provide innovative, community-based solutions that meet the diverse needs of SEND young people.