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I am writing on behalf of the Independent Schools Association (ISA) member schools to provide a consolidated perspective on the current SEND and Alternative Provision reform proposals. ISA welcomes the ambition to create a more consistent, inclusive and sustainable system. However, we believe strongly that successful reform must recognise, and indeed fully utilise, the significant contribution of the independent sector as a core partner within the SEND system, not a peripheral provider.

Independent schools, both mainstream and specialist, already play a critical role in delivering high-quality outcomes for children and young people with SEND. Our schools educate a substantial number of students with complex and overlapping needs, including 11,000 of those learners with Education, Health and Care Plans (EHCPs), and frequently support learners whose needs have not been met elsewhere. This positions the sector as a key contributor to system capacity, innovation and expertise.

Key Findings from ISA Member Schools

Responses from ISA member schools demonstrate a high level of engagement with the SEND and Alternative Provision reforms, alongside consistent themes across the sector. Indeed, 220 ISA member schools are SEND specialist provisions or Alternative Provision (AP) providers.

A central concern is the risk of over-standardisation, particularly in relation to proposed specialist provision packages. Members repeatedly emphasised that SEND provision must remain individualised, flexible, and responsive. While there is recognition that greater consistency in commissioning may be beneficial, there is widespread concern that a package-based approach could undermine the personalised nature of EHCPs, reduce professional discretion, and lead to provision being shaped by what is available rather than what is needed.

There is also significant concern about increasing thresholds for EHCPs and the introduction of price banding. Many member schools highlighted the likely consequence that more students with significant and meaningful needs may fall below the statutory threshold. Linked to this is a consistent view that funding is already insufficient to meet need and provide impact, particularly in relation to staffing and specialist support.

A further concern of the reforms is that the proposed changes may result in a transfer of responsibility from the state to schools and families, noting the risk of reduced access to external services and funding. Across views from member schools, workforce capacity and expertise were identified as the single most important factor in effective SEND provision and we welcome investment in this area, with school leaders consistently highlighting the importance of trained staff, specialist input, and sufficient staffing ratios.

There is a strong concern that the proposals, alongside wider regulatory changes, may erode the flexibility and autonomy that underpin effective provision within independent settings, of which many students greatly benefit from.

Despite these concerns, there is clear consensus among ISA member schools about what constitutes effective SEND provision in mainstream settings, modelling much of the practice seen daily across the independent sector. Key elements include:

- High-quality adaptive teaching
- Early identification and intervention
- A graduated, needs-led approach
- Strong whole-school ownership of SEND
- Access to specialist expertise

Value added by the independent sector

The independent sector adds demonstrable value to the SEND system in several important ways:

- **Specialist expertise and integrated provision**
Many independent settings deliver highly specialised, multidisciplinary support, combining education with therapeutic and clinical input (e.g. speech and language therapy, physiotherapy, occupational therapy, and mental health support). These integrated models are often essential for children with complex needs.
- **Flexibility and responsiveness**
Independent schools are able to adapt provision rapidly in response to evolving need. This flexibility allows for genuinely personalised pathways, including hybrid provision, phased reintegration, and tailored curriculum models that prioritise readiness to learn alongside academic progress. The independent sector recognises that ‘education’ and ‘school’ may look different for some children, but still hold the same high expectations, regardless of method or delivery.
- **System stabilisation and capacity**
Independent settings frequently support students following placement breakdown, prolonged absence or crisis. In doing so, they reduce pressure on maintained provision, prevent escalation into more costly interventions, and support local authorities to meet statutory duties.
- **Early intervention and outreach**
Many schools within the sector extend their impact beyond their own students through outreach, training and partnership work with mainstream settings and local authorities; strengthening system-wide capacity and supporting earlier intervention.
- **Strong outcomes and preparation for adulthood**
Independent schools consistently demonstrate success not only in academic progress, but in wider outcomes including attendance, wellbeing, independence, readiness for independent living, social skills and preparation for adulthood; areas which are critical for long-term societal benefit.

These contributions represent significant value for money, particularly when viewed in the context of avoided costs associated with exclusion, non-attendance, long-term care, or other social systems.

Key considerations for reform

Whilst we support the direction of reform, several aspects require careful consideration to ensure they strengthen rather than unintentionally weaken the system. Firstly, caution should be considered around over-standardisation, particularly in relation to Specialist Provision Packages (SPPs) and nationally defined frameworks. While consistency is important, children’s needs are highly individual, fluid and often overlapping. Rigid categorisation risks

oversimplifying complexity and constraining effective provision. Frameworks must therefore remain flexible, outcomes-focused and responsive, enabling professional judgement and personalised planning.

Secondly, reforms must protect the integrity and enforceability of provision. The introduction of Individual Support Plans (ISPs) alongside EHCPs has potential benefits, but only if there is absolute clarity that statutory entitlements are not diluted. Any perception that ISPs act as a substitute or gatekeeping mechanism for EHCPs risks undermining family confidence and increasing conflict within the system. Furthermore, it is essential that funding models remain needs-led and reflective of complexity. Cost in the independent specialist sector is driven by the level of support required, including staffing ratios, unique, low-arousal environmental settings therapeutic input and enhanced safeguarding. Approaches such as price banding or cost containment that do not fully account for this risk reducing capacity for those with the most complex needs and leading to poorer outcomes overall.

The success of any reform will depend heavily on workforce capacity and expertise. Across all sectors, staff need the training, time and support to deliver high-quality SEND provision. The independent sector holds substantial expertise in this area and stands ready to contribute to workforce development at system level. Considered planning and an audit of the current training provision needs to occur to clearly identify where support is much needed. ISA member schools welcome the opportunity to contribute to this.

Finally, we emphasise the importance of a genuinely inclusive system architecture. Local SEND partnerships, national standards, and system planning must explicitly include independent schools as equal partners. Our experience, data and practice-based evidence are vital to ensuring that reforms are grounded in operational reality.

A collaborative way forward

ISA member schools are clear in their willingness to work collaboratively with government, local authorities, and colleagues across the maintained sector. We believe that a plural system, one that values diverse types of provision, is essential to meeting the full range of need of children and young people in modern society.

Reform will be most effective where it:

- Maintains a strong child-centred and needs-led approach
- Protects flexibility and professional discretion
- Ensures secure and transparent funding aligned to need
- Embeds multidisciplinary and specialist expertise
- Actively leverages the capacity, knowledge, expertise and resources of the independent sector

Above all, success should be measured not by structural change alone, but by whether children and young people are able to thrive, feel safe, engage in learning, and successfully transition into adulthood.

The independent sector is not separate from the SEND system: it is already a critical part of its delivery and its solution. We therefore strongly encourage the Department for Education to ensure that reforms are designed and implemented in a way that fully harnesses this contribution, whilst keeping children, their families and their genuine lived experiences at the heart of any meaningful decisions.

We welcome ongoing dialogue and would be pleased to support further development of these proposals in partnership.

Yours faithfully,

A handwritten signature in black ink that reads "Hannah Lovegrove Champion". The signature is written in a cursive style with a large initial 'H'.

Hannah Lovegrove Champion
Independent Schools Association: Head of SEND
On behalf of ISA Member Schools