Appendix 2. National challenges with the identification of SEND and use of SEND data

The consistent identification of SEND remains fraught with challenges, largely due to the subjective and interpretative nature of the existing SEND frameworks and the overarching definitions. These frameworks, originally set up in the late 1970s and 1980s, have not been appropriately reviewed or updated since. As a result, comparisons and judgements made about incidences of SEND are challenging to make and uphold in a robust way.

These challenges are well documented, and have been identified by subsequent governments and independent experts over decades (House of Commons Select Committee, 2006; OFSTED, 2010; DfE, 2011; DfE 2023; Education Policy Institute, 2025), and include:

●   Inconsistent application and differing interpretation and implementation of policy in different areas
●   Lack of a clear, unambiguous and universal understanding of what SEND is and how to identify it
●   Masking of needs by children and young people, particularly those with social, emotional, or neurodevelopmental differences
●   Impact and implications of the whole-school environment, curriculum and provision on whether needs are able to be met without identifying as SEND
●   Parental influence - understanding need and knowing when and how to support identification through external assessment and diagnosis

The Education Policy Institute (2025) has further explored these challenges, identifying the following key areas for consideration (some of which continue to evidence the long-term systemic issues set out above):
●   Postcode lottery- 'The school attended was more important than anything about the individual child in explaining who was identified with SEND' (EPI, 2025: 6). 'Local authorities played a smaller-than-expected role in the chances of SEND identification' (EPI, 2025: 7).
●   Link between SEND identification and deprivation- Rates of SEND identification are influenced by access to enriching experiences. Early Personal, Social and Emotional Development at age 5 as being a key indicator of future SEND identification
●   Link between looked-after status and early childhood experiences- Children with adverse early experiences or in care are disproportionately likely to be identified with SEND.
●   Gender disparities - Emotional and neurodevelopmental needs in girls are frequently masked or misinterpreted, leading to later or missed identification.

Understanding the Challenges: SEND Data and Identification

Across England, there are national challenges in how children and young people with SEND are identified and supported. The quality and consistency of data play a big part in this.

● Different definitions and thresholds: Schools and local authorities don't always use the same criteria to decide when a pupil has SEND. This makes national data difficult to compare or rely on.

● Data that misses the detail: Numbers alone don't show the full picture — for example, they may overlook children whose needs are emerging or unmet, or whether the help they receive is making a difference.

● Separate systems: Education, health, and social care often hold data separately, which makes it hard to build a full picture of a child's needs and outcomes.

● Looking backwards, not forwards: National data often relies on test results or exclusion figures, which show what has already happened rather than what support is needed early on.

Consequently, national SEND data provides only a partial view of what children need and how well the system is working.

What This Means for Local Authorities

These national issues directly affect how local authorities plan, fund, and monitor SEND support in their areas.

● Getting the local picture right: If schools record SEND differently, the local authority can't get a true sense of how many children need support or what kind of help is most needed.

● Fair funding: Inconsistent data can lead to funding being unevenly distributed — some areas may have hidden unmet need, while others face financial strain from over-identification.

● Early help and inclusion: If needs aren't identified early, children are less likely to get timely support. This can lead to bigger challenges later, such as exclusions or the need for specialist placements.

● Using data for improvement: When education, health, and social care data aren't joined up, it's harder for local authorities to track progress, understand impact, and plan better services.

Without clearer and more consistent data, access to SEND support can depend too much on where a child lives or how well their needs are understood, rather than on the level of need itself. Improving data quality and coordination is key to ensuring fair, effective support for all children and young people.

Further detail about these challenges and proposals for how to address them more effectively are expected in the pending DfE policy updates- expected Autumn 2025. The SEND and Alternative Provision (AP) Improvement Plan (DfE, 2023) commits to greater standardisation and transparency through the introduction of a national banding framework, consistent EHCP templates, and

strengthened local inclusion partnerships. These initiatives aim to improve consistency, but their success will depend on coherent implementation, workforce development, and effective data integration.

Dr. Alison Ekins, Director of SEND Valley Invicta Academy Trust
Kristina Yates, Former principal of Turner Free School Kent and Independent consultant specializing in SEND.
October 2025