

SEND Commissioning in London

June 2025

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This report was commissioned by [LIIA](#) and produced by [Mime](#)

Executive Summary

A. Background to the project

- **Context:** The London Innovation and Improvement Alliance (LIIA) commissioned Mime to collect evidence to guide their Special Educational Needs and Disabilities (SEND) commissioning workstream. This workstream aims to address the challenges in the commissioning of placements and services for the growing cohort of young people with SEND. This research takes place in a changing national SEND context.
- **Scope and stakeholders:** The research took a wide definition of SEND commissioning, encompassing education, care, therapy, and support services, with input from local authorities, NHS stakeholders, and parents/carers.
- **Data collection:** We collected qualitative data through focus groups and stakeholder surveys to understand strengths and challenges in SEND commissioning across London. We also analysed person-level SEN2 return data and public DfE datasets to understand the current and future commissioning needs across London.

B. Overview of current approaches to SEND commissioning in London

- **Varied approaches:** Approaches to SEND commissioning vary across London, with local authorities using a number of different models.
- **Collaboration challenges:** Collaboration is patchy. While there is some joint commissioning, these efforts are often considered to be ineffective. Barriers include unclear roles, resource constraints, and difficulties with data sharing.
- **Enablers of effective commissioning:** Strategic planning, robust data sharing, and well-defined collaboration structures were identified as enablers of effective SEND commissioning and means to achieving better outcomes for young people with SEND.

C. Skills and expertise for SEND commissioning

- **Skills and expertise gaps:** Expertise in SEND commissioning varies across local authorities and Integrated Care Boards (ICBs), with gaps in the availability of specialist finance, procurement, and legal resources. These resources are often shared with other services, and so lack SEND-specific expertise.
- **Reliance on peer support:** Informal peer networks, for example colleagues at other local authorities, are a key source of expertise sharing and professional development.
- **Challenges and support needs:** High staff turnover as well as limited capacity and resources exacerbate skills gaps. In particular, stakeholders identified monitoring and evaluation as an area where external support would be useful.

D. Data for SEND commissioning

- **Demand for better and more data:** SEND commissioners recognise the importance of data for commissioning and would like to see improved sharing of high-quality data across London, particularly around independent school placements.
- **Barriers to data sharing:** There are several challenges to data and information sharing, particularly around health data, arising from uncertainties around legal frameworks and data security, and a lack of established processes for sharing.

- **Role for a SEND commissioning hub:** Stakeholders expressed a need for a pan-London SEND commissioning hub, hosting data tools, as well as a data working group, to improve the collection, sharing, and use of data for SEND commissioning across London.

E. Market position analysis and need forecast for London

- **Continued growth forecast for London's EHCP cohort:** Despite declining numbers of 0 to 25 year olds, London's cohort with education, health and care plans (EHCPs) is growing rapidly, with growth forecast to continue in both inner and outer London.
- **Shifting age and need profiles:** We forecast particular growth in the need for secondary and post-16 specialist provision as the large current primary age cohort ages. Speech, language, and communication needs (SLCN) are also forecast to become a larger proportion of the cohort, alongside autism spectrum disorder (ASD).
- **Provision gaps:** Insufficient expansion of state-funded provision has increased reliance on independent providers, especially for secondary age pupils with social, emotional, and mental health (SEMH) needs and ASD.
- **Need for additional provision:** Without significant development of state-funded provision, including investment in inclusion in mainstream schools, secondary and post-16 provision gaps will widen, and reliance on independent places will increase.

F. A future model for London

- **Changing national context:** Ongoing changes to SEND funding, policy, and the restructuring in the health and care sectors create uncertainty, presenting both challenges and opportunities for effective SEND commissioning in London.
- **Opportunity from focus on inclusion:** The DfE and Ofsted have a clear focus on improving inclusion in mainstream schools. If implemented effectively, this could reduce the need for commissioning of independent school places.
- **Widespread desire for collaboration:** Stakeholders strongly support more collaboration across London, with unanimous interest in joining a new SEND commissioners' network.
- **Focus areas for collaboration:** Stakeholders see value in pan-London collaboration on school placements, sub-regional collaboration on health services and specialist equipment, and inner London collaboration on transport and post-16 college places.
- **Improving outcomes from collaboration:** Enhancing collaboration and joint commissioning could lead to quicker commissioning of more suitable placements, better outcomes for young people with SEND, and improved value for money.

G. Recommendations

We have made recommendations across three key areas:

- **Priorities setting, buy-in and peer-support:** This includes establishing a pan-London SEND commissioning hub to lead pan-London collaboration, and support sub-regional leads to identify priorities for sub-regional collaboration
- **Data sharing:** Create a pan-London SEND commissioning data working group leading efforts to share more data across London, including through two new data tools used to better understand London's specialist providers.
- **Joint commissioning:** We recommend a phased approach to collaboration, starting with agreeing priorities at different geographical levels, then developing business cases and piloting initiatives with willing partners, taking learnings to refine efforts.

A. Background to the project

Context

The London Innovation and Improvement Alliance (LIIA) is the Association of London Directors of Children's Services (ALDCS) sector-led improvement partnership. LIIA leads several workstreams including one focused on the commissioning of placements and services for young people with SEND. Through this workstream, LIIA is seeking to address the growing pressures and financial challenges on local authorities and Integrated Care Boards (ICBs) as they try to meet the needs of young people with SEND. In particular, LIIA seeks to identify opportunities for more effective collaboration across London.

Mime is a London-based, mission-led organisation that has been working with local authority SEND teams and been a leading voice in the wider SEND sector since 2007. In particular, as SEND cohorts have grown rapidly over the last decade, Mime has supported local authorities across London and beyond with SEND cohort modelling, informing provision sufficiency analysis and commissioning plans.

In October 2024, LIIA commissioned Mime to support this workstream, including helping to build an understanding of the current challenges and opportunities for SEND commissioning across London. Through this work, LIIA hopes to support a more effective approach to SEND commissioning, building on London's strengths and addressing gaps.

This report outlines the current picture of SEND commissioning across London, identifies skills gaps, and looks at the current and future use of data. It then explores the market position for SEND commissioning, including forecasted SEND need and provision gaps, and outlines a future model for more effective collaboration on SEND commissioning. Finally, the report sets out recommendations to be taken forward and an implementation timeline.

Project scope

Throughout this research, we have followed a broad definition of SEND commissioning. As shown in the diagram below this covers the strategic planning, procurement, and monitoring and evaluation of placements and services for young people with SEND. This includes the commissioning of:

- School and alternative provision places, including independent and non-maintained school places
- Other education provision for young people with SEND, such as tuition services
- Therapy services for young people with SEND
- Experiences for young people with SEND and their families, such as short respite breaks
- SEND transport services
- Wider SEND support services for schools
- Training and development around SEND

Data collection

The analysis in this report and the recommendations made are based on a combination of qualitative and quantitative evidence gathered between October 2024 and March 2025. This included:

1. Online desk-based review of **existing evidence** in London and beyond, including relevant examples from outside the SEND sector, such as in the care sector.
2. An online **survey** of London **local authority** SEND commissioning stakeholders. This covered SEND commissioning roles, available resources, strengths and challenges in their local authority, views about the value of collaboration, and specific questions about the commissioning of independent and non-maintained special school places. The survey was completed by 21 respondents representing 22 London local authorities. Respondents were all senior leaders, though were a mixture of service leads (directors and assistant directors) and heads of SEND commissioning.
3. An online **survey** of London **ICB** SEND commissioning stakeholders. This covered SEND commissioning roles, available resources, strengths and challenges in their ICB, and views about the value of collaboration. The survey was completed by eight senior SEND or children's health leaders, representing all five London ICBs.
4. **Focus group** discussions with parents and carers, and local authority and NHS stakeholders. We held two rounds of six focus groups. The first set of six focus groups discussed the "as-is" for SEND commissioning in London, including what works well, existing collaboration, and skills gaps. The second set of six focus groups looked at a "to-be" vision for SEND commissioning in London, including how to more effectively collaborate, how to share data and information, and how to meet growing and increasingly complex need.
5. Analysis of **person-level SEN2 data** on the EHCP cohorts across half of London local authorities. This includes information on the age profile, need type, and provision type of the cohort. This was augmented by analysis of the public DfE data on London's EHCP cohort.
6. Analysis of the **Get Information About Schools** (GIAS) dataset. This includes provider level data on the capacity and SEND specialisms of specialist provision across England.
7. Discussions with a **small project steering group** of LIIA, local authority, NHS and DfE stakeholders. Throughout the project, this steering group provided feedback, challenge and suggestions on the value, feasibility, and relevance of the emerging findings and recommendations.

The majority of the data analysed in this report was specifically collected for this project and therefore covers London only. Therefore, the analysis in this report is for London only, though some comparator data is referred to where useful. Where relevant, differences within London are discussed, for example between inner and outer London local authorities. We also looked at differences between the five London sub-regions (as defined by the NHS ICB areas¹). While we have included sub-regional analysis in some key places, we often found that differences at this geographical level were less clear and sample sizes in some sub-regions were small.

¹ See appendix 2 for more details

B. Overview of SEND commissioning

SEND commissioning approaches summary

This section outlines the current approach to SEND commissioning across London, bringing together evidence from our desk research, stakeholder surveys, focus groups and steering group discussions. The analysis shows the variability, strengths and limitations in the effectiveness of SEND commissioning across London's local authorities and ICBs, including the nature and successes of existing collaboration. The key findings are summarised below:

- **Range of commissioning models** – There are a wide range of approaches to SEND commissioning across London's local authorities and ICBs. For example, half of surveyed local authorities have a designated SEND commissioning role, while the other half do not.
- **Limited dedicated resource** – It is rare for local authorities or ICBs to have dedicated specialist legal, procurement and finance resourcing for SEND commissioning. Instead, these resources are usually shared with other local authority functions, or are occasionally outsourced to third parties with limited SEND expertise.
- **Fee negotiations** – While it is not currently commonplace, stakeholders agreed that a collective approach to fee negotiations, including through formal collaboration, would be beneficial. Additionally, negotiation skills were identified as a clear skills gap. Through collaboration and stronger negotiation skills, it was felt that SEND commissioners could achieve better value for money, particularly in the commissioning of independent and non-maintained special school placements. However, it was acknowledged that market forces and parental choice can present a barrier to more effective negotiations on these school placements.
- **Patchy joint commissioning** – There is some joint commissioning, particularly between local authorities and ICBs, though this is not common. When this joint commissioning does happen, stakeholders sometimes feel they are merely sharing the cost, rather than strategically combining their expertise and resources. In other cases of joint commissioning, the delineation of roles was unclear, leading to delays and frustration for young people with SEND and their families.
- **Some collaboration exists** – Beyond joint commissioning, there are examples of formal cross-borough collaboration, as well as several informal networks that support SEND commissioners across London. However, a large proportion of local authority stakeholders report that collaboration with other local authorities is ineffective. This ineffective collaboration is most commonly reported in outer London.
- **Common barriers** – There is widespread agreement on the barriers to collaboration on SEND commissioning, with resource constraints and difficulties with data and information sharing common. The sharing of health data both within the NHS, and with local authority partners, is particularly problematic.
- **Clear enablers** – Stakeholders identified strong strategic planning, data and information sharing, and established structures for collaboration as important enablers of more effective SEND commissioning.

SEND commissioning roles

The way SEND commissioning is managed and resourced across London's local authorities and ICBs varies widely. Around half (52%) of surveyed local authorities, and just one of London's five ICBs, said they have a dedicated SEND commissioning role. Inner London local authorities are more likely to have a dedicated SEND commissioner than those in outer London, where broader commissioning lead roles, with responsibility beyond SEND, are more common.

Indeed, half of local authority survey respondents said that SEND commissioning in their local authority is managed by a cross-cutting commissioning team, with responsibility for commissioning services for other areas of the local authority.

We also found that it is common for there to be a separation between the commissioning of school and college placements for pupils with SEND, and other SEND services. However, there is very little consistency between different local authorities on exactly how these are divided, with models varying across London, as outlined in the quotations below.

"SEND commissioning roles are split between the wider commissioning team (covering SEND transport and therapies) and the education team (covering strategic, operational and pupil-based commissioning)"

"We have Integrated Commissioning Services covering all strategic commissioning, procurement, contract management, market development and associated activities for children's social care, education (including SEND and Inclusion), health, public health, youth justice, and early help and family hubs."

"SEND and admissions is supported by the Children's Services commissioning and transformation teams, which sit within Children's Services but outside operational delivery."

Professional services for SEND Commissioning

There is also variation in the resourcing of supporting functions for SEND commissioning across local authorities and ICBs. Across London, **access to dedicated legal, procurement and financial** expertise for SEND commissioning is uncommon.

In fact, no local authority or ICB respondents said they had access to fully dedicated legal resources specifically for SEND commissioning, and almost none had access to dedicated procurement resources.

The large majority of local authorities reported sharing legal and procurement resources with other local authority teams, often with education teams. However, most ICB respondents

reported having very little access at all to specialist legal or procurement resources for SEND commissioning.

This is discussed in more detail in the skills and expertise section below.

Strategic direction for SEND commissioning

A further issue raised in focus groups was that **SEND commissioning can sometimes lack an overarching strategic direction**. It was felt that commissioners should be guided by a strategic direction that clarifies the needs being addressed and defines the outcomes expected from commissioned placements and services.

Co-produced strategies

Focus group participants were clear that local SEND strategies should be co-produced with families and a range of local area stakeholders, including from the local authority, NHS and schools. Ideally, this should be driven by an accurate and up to date joint strategic needs assessment (JSNA).

This strategy should define the outcomes that should be achieved through the commissioning of SEND placements and services. Many focus group participants felt that such an approach would lead to the commissioning of earlier, more cost-effective interventions that can address SEND needs before escalation to a young person requiring an EHCP or a special school placement. As the [Lenehan review](#) laid out, 'a lack of early intervention can have a significant effect on the need for services further downstream'.

Outcomes based SEND commissioning

Another fundamental barrier to effecting SEND commissioning is that it can too often refer to outputs, for example "100 hours of speech and language therapy", instead of being outcomes based. For example, an outcome could be to support a young person with speech, language and communication needs to successfully achieve the year 1 phonics standard.

Outcomes Based Commissioning and the SEND Reforms, Council for Disabled Children (CDC)

This paper sets out a practical model for local leaders to establish outcomes based SEND commissioning. The model outlines how SEND commissioners should first agree a strategic vision, then set meaningful outcomes and agree measurements, and then commission the most suitable placements and services to meet those outcomes.

https://whatworksinsend-1d0ab.kxcdn.com/wp-content/uploads/2022/09/OBC-briefing-Final_1_0.pdf

Approach to fee negotiations

There is currently no consistent collective approach to fee negotiations and many stakeholders feel that they do not always achieve value for money. There was particular frustration among stakeholders with their ability to negotiate effectively in the commissioning of independent and non-maintained school placements. Many stakeholders engaged in this research felt they did not achieve value for money from these providers.

Additionally, stakeholders identified negotiation skills as an important gap. This was particularly pronounced in outer London where only 18% of local authority survey respondents reported sufficient negotiation skills in their local authority. In addition, ICB stakeholders were less likely than local authority stakeholders to see negotiation as part of their SEND commissioning role, seeing their role instead as much more about planning and reviewing provision.

Stakeholders identified that a collective and strategic approach to independent and non-maintained special school placements commissioning, the most expensive type of placement commissioned in London, could help to ensure better value for money. While only a small minority of survey respondents reported existing collaboration in this area, a large majority were keen to collaborate on the commissioning of independent and non-maintained special school places. However, it was also acknowledged that the current market dynamics, with demand for specialist provision outstripping the supply of state-funded specialist placements in many areas, as well as the rights of parents in choosing provision, both limit SEND commissioners' ability to negotiate effectively.

London's SEND commissioners should draw lessons from similar efforts in the care sector. As well as the example case study below, the government has launched regional care cooperatives, which will negotiate with providers as 'one customer'. Through working together, the government hopes that the cooperatives can shape their local markets, ensuring local needs are met while ensuring value for money.

One example of cross-borough collaboration supporting effective fee negotiations in London, is the Commissioning Alliance's work in the adult social care market, outlined in the case study below.

Using Shared Data to Shape a Sustainable Adult Social Care Market in West London

Context

Commissioning Alliance, part of West London Alliance (WLA), has initiated a collaborative commissioning effort across seven local authorities in North West London (NWL) to create a more sustainable, equitable, and high-quality adult social care market. Faced with rising costs and fragmented data, they co-developed a shared Power BI dashboard with stakeholder local authorities, revolutionising the use of data for commissioning decisions.

Intervention

At the heart of this transformation is collaboration. Rather than working in isolation, boroughs now contribute quarterly data to a shared, interactive platform enabling teams to

self-serve analysis in real time. The dashboard offers layered reporting, dynamic benchmarking, and filtering, empowering strategic leads and operational teams to interrogate spend, performance, and provider quality at both granular and regional levels.

This shared data infrastructure has paved the way for smarter budgeting and effective market shaping. One notable example is the new purchasing system for bed-based care, focussing on people living close to home in NWL and supporting local provider sustainability. The dashboard also tracks quality using CQC ratings and length of stay, giving commissioners tools to balance cost and quality in real time.

The database has enabled boroughs to collaborate with the local ICB who now share Continuing Health Care data and engage in the accompanying work. This gives boroughs a comprehensive view of care purchases, prices, and reasons, crucial for joint planning between councils and the NHS, and for confidently challenging high-cost care packages.

The tool supports a growing community of practice among placements and brokerage teams, helping them share live cost data, market intelligence, and provider engagement insights. This strengthens relationships across the sub-region and promotes a more joined-up approach to value-for-money commissioning.

Challenges

Challenges included the complexity of data integration, particularly aligning CHC data across systems, and embedding a culture of data use among very busy operational teams. Key to overcoming these challenges were:

- Building on established collaborative networks and having a clear and shared goal for data use
- Securing a shared platform which does not require individual Power BI licences
- Engaging with data teams to ensure data collection was necessary and reviewed over time for relevance
- Providing training and support so officers can use the data, and embed it into local working arrangements
- Establishing a community of practice for key end users creating a powerful feedback loop
- Having active officers critically review data outputs and identify opportunities to shape work plans

Impact

While the tool is now widely adopted, ongoing training and feedback loops are essential to keep it relevant to frontline needs. Boroughs report improved fee negotiation confidence, enabled earlier identification of inflation pressures, and better preparedness for new CQC inspection regimes. Most importantly, it has laid the groundwork for a more transparent and collaborative care market. With the right shared infrastructure, partnership commitment, and focus on frontline usability, this model is well-positioned for replication in other regions.

Commissioning Alliance are now replicating the data dashboards for the children's social care market following a successful pilot, aiming for similar transformative impacts and a more integrated, efficient system.

One route to collective fee negotiation is through formal partnerships and collaborations, which are explored further below.

Partnerships and collaboration

As well as different models within London's ICBs and local authorities, there are also different examples of working in partnership on SEND commissioning. These include:

- **Bi-borough partnerships** – There are examples in London of neighbouring boroughs working together on SEND commissioning. For example, Kensington and Chelsea, and Westminster, have a bi-borough SEND service. In a broader partnership, Kingston upon Thames and Richmond upon Thames have a formal partnership (Achieving for Children) through a community interest company that provides all children's services functions across the two boroughs (and in neighbouring Windsor and Maidenhead).
- **Sub-regional partnerships** – There are also established sub-regional partnerships supporting local authorities with commissioning beyond SEND. For example, in London, the Commissioning Alliance supports west London local authorities with the commissioning of social care, education, and housing services. Though based in west London, in several areas of their work the collaboration includes local authorities in other parts of London and beyond.
- **Professional networks** – We heard about networks, varying in structure and formality, that support SEND commissioning across London. This includes a 'London Short Breaks Network' and a 'Pan-London Alternative Provision Network', through which stakeholders 'share experiences, seek advice and undertake benchmarking of provision and funding arrangements'.
- **Joint commissioning strategies** – There are examples of joint commissioning strategies, shared between local authorities and relevant NHS commissioners. Often these go beyond SEND, encompassing joint commissioning of health and social care services for both children and adults.

However, one survey respondent told us that even when joint commissioning 'works' it 'feels like the sharing of financial resources, rather than a shared endeavour or accountability to commission services'. Parents and carers of young people with SEND also expressed the frustration that they find themselves in the middle of arguments between their local authority and ICB about funding splits. This is not just a London issue, with the Lenehan review finding 'little evidence of systematic cross-system

"We do not have any existing joint commissioning arrangements with the NHS."

"We have joint funding of posts around SEND but not fully jointly commissioned services with the NHS. "

"Shared commissioning is operational rather than strategic to meet shared needs."

"Currently there is no joint commissioning."

commissioning with health and local authorities of good early intervention and therapeutic family support/short breaks services.'

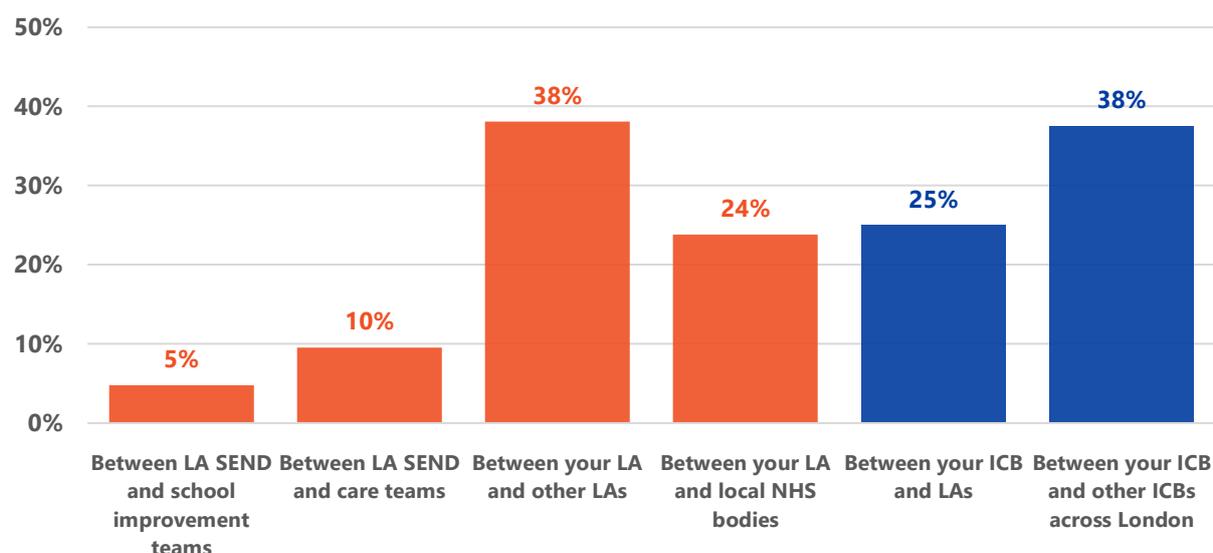
- **Joint Strategic Needs Assessments (JSNA)** – Although not directly related to SEND commissioning, local authorities publish JSNAs, often produced in partnership with NHS commissioners, which set out the key data on local needs. If these are accurate and up to date, they can be a useful tool for informing SEND commissioning, helping to ensure that commissioning is targeted at meeting local needs.

Effectiveness of collaboration on SEND commissioning

Current collaboration on SEND commissioning was often described as ineffective, despite a clear willingness to collaborate among stakeholders.

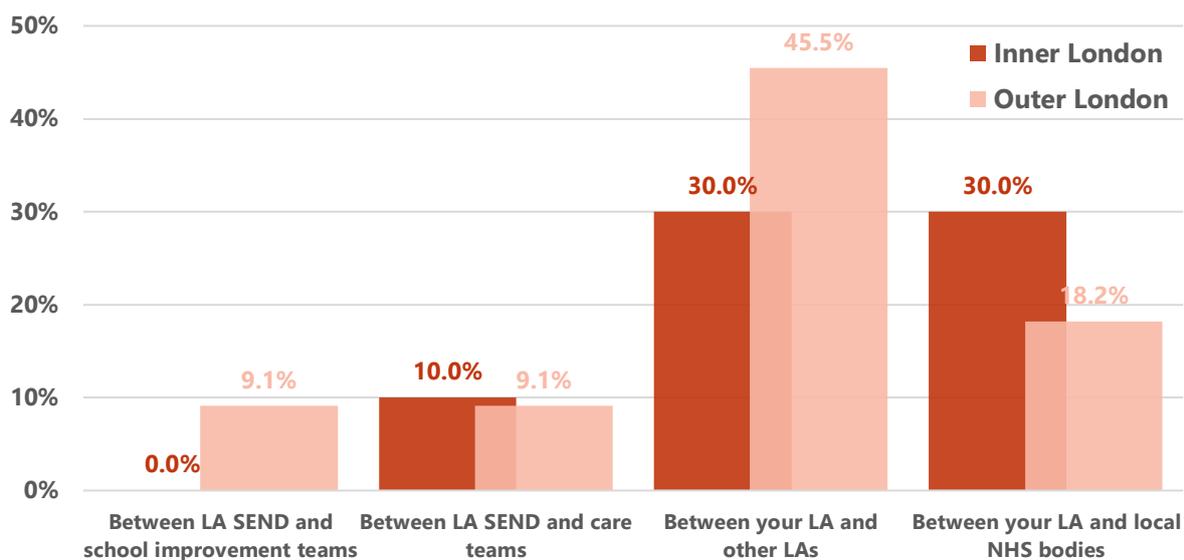
Across London, 38% of surveyed local authorities reported that collaboration on SEND commissioning with other local authorities was somewhat or very ineffective. Mirroring this, 38% of ICB respondents told us that their collaboration with other ICBs was ineffective. In contrast, the most effective collaboration was within local authorities, between SEND and school improvement teams, or between SEND and social care teams.

Figure 2: Survey respondents identifying collaboration as 'somewhat' or 'very' ineffective



Differences emerged between inner and outer London local authorities in the effectiveness of cross-organisational collaboration on SEND commissioning. In outer London, where local authorities tend to cover larger geographical areas, collaboration with other local authorities is considered particularly ineffective. Almost half of respondents from outer London local authorities said collaboration on SEND commissioning with other local authorities was somewhat or very ineffective. In contrast, inner London local authorities seem to struggle more in setting up effective collaboration with local NHS bodies.

Figure 3: Inner and outer London respondents identifying collaboration as somewhat or very ineffective



Barriers to collaboration

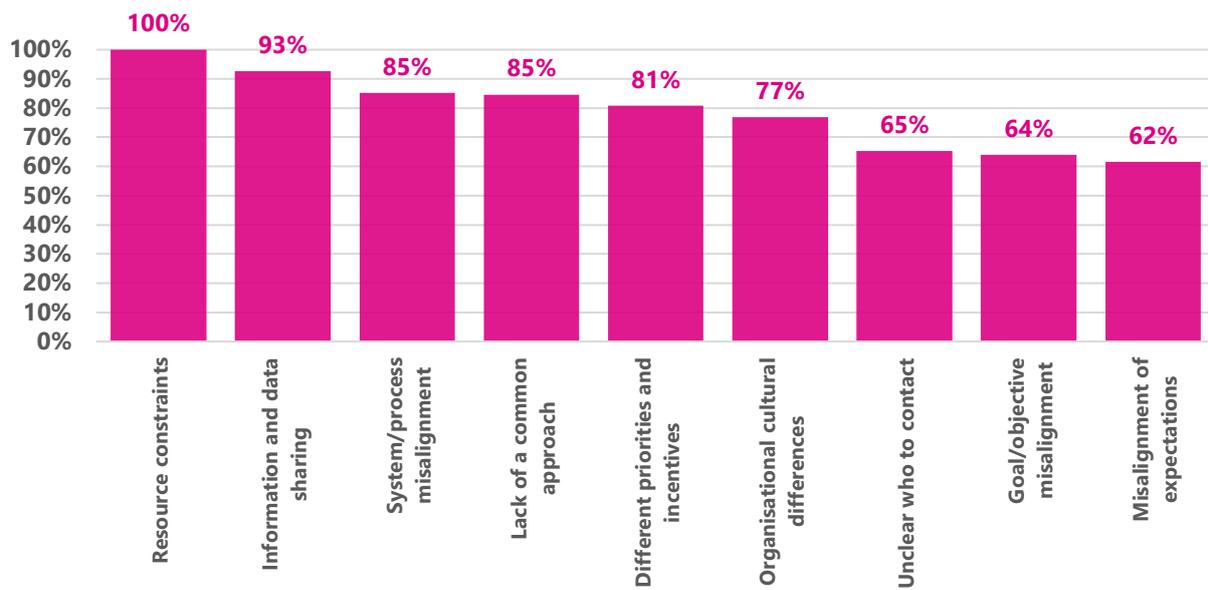
As well as a clear feeling that collaboration could be more effective, there was **widespread agreement on the barriers to collaboration** on SEND commissioning in London.

All respondents, from both local authorities and ICBs, stated that resource constraints were a barrier, with the overwhelming majority also identifying information and data sharing as a barrier.

In focus groups, we heard that sharing health data on young people with SEND was particularly difficult, and that misaligned contract timelines between local authorities and ICBs prevented effective collaboration. Stakeholders also identified the reliance on individual relationships and high staff turnover as important barriers to cross-organisational collaboration.

Organisational cultural barriers were also identified by the majority of survey respondents, including system or process misalignment, the lack of a common approach, and different organisational priorities and incentives.

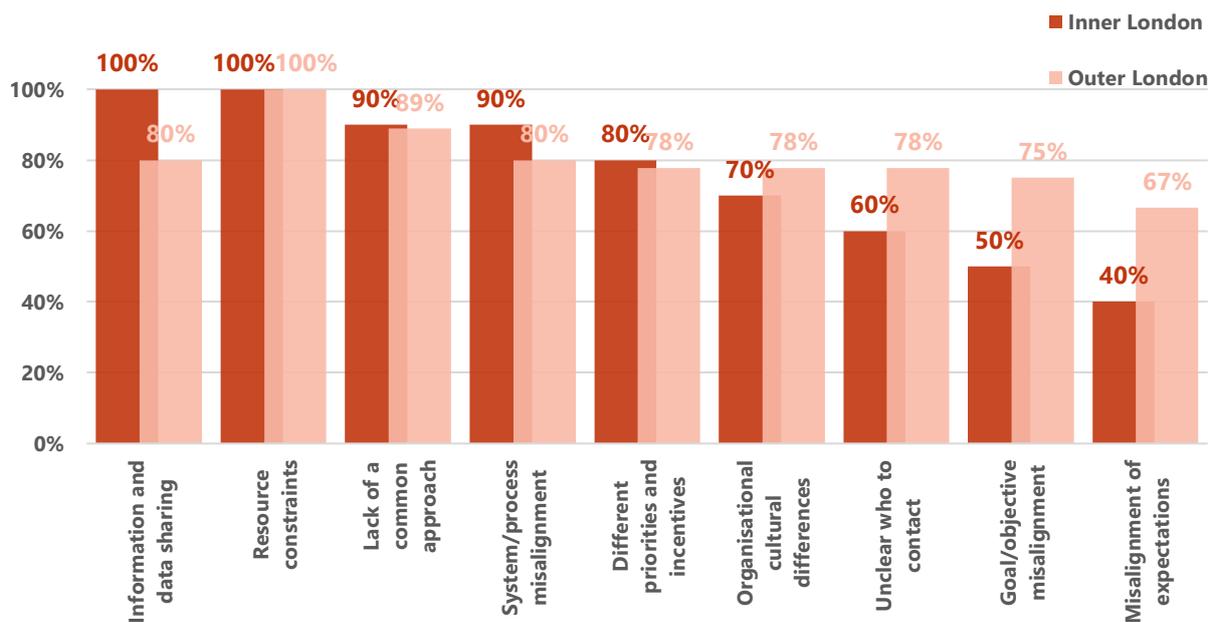
Figure 4: Respondents identifying issues as 'somewhat a barrier' or a 'significant barrier' to collaboration



In general, respondents from inner London local authorities were more likely to identify barriers. While clearly an important barrier across the whole of London, information and data sharing was far more commonly identified as a barrier in inner London. Different systems for data collection, a reluctance to share data, as well as different systems for sensitive patient information, were identified as some sources of this barrier.

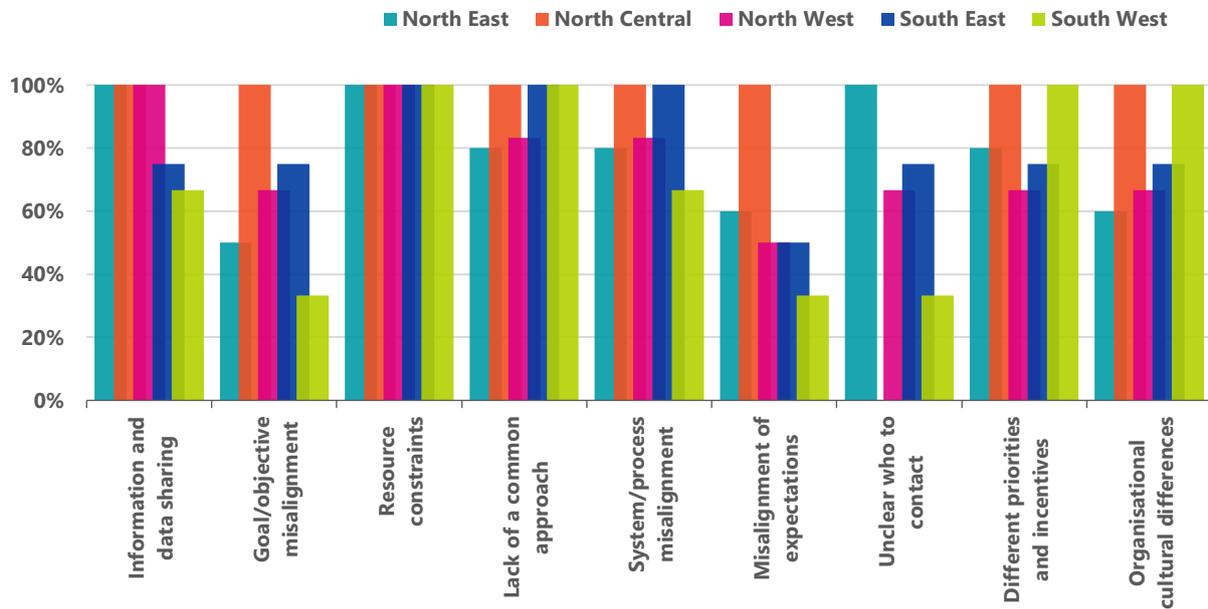
On the other hand, misalignment of expectations was more likely to be a barrier in outer London.

Figure 5: Local authority respondents identifying issues as 'somewhat a barrier' or a 'significant barrier' to collaboration



As shown in the chart below, there were also differences in the barriers reported across London’s sub-regions. Notably, information and data sharing was least commonly identified as a barrier in South West London, where a [Data Strategic Plan](#) has been put in place.

Figure 6: Local authority respondents identifying issues as ‘somewhat a barrier’ or a ‘significant barrier’ to collaboration by subregion



Enablers of effective SEND commissioning

The examples of effective practice that emerged through the research demonstrated that **there are some important enablers of more effective SEND commissioning**. These enablers help to bring about better outcomes for young people with SEND and better value for money for commissioners. These enablers include strong strategic planning, robust information and data sharing, and well-defined frameworks for partnership working.

Strong strategic planning

Developing co-produced SEND strategies is critical. These strategies should be collaboratively designed with young people, their families, associated experts and other local stakeholders, focusing on clear and measurable outcomes to be achieved through commissioned placements and services. This helps to prioritise and ensures that the commissioning decisions are made with the most important outcomes in mind.

Information and data sharing

Effective commissioning relies on robust mechanisms for sharing information and data. This must include clear guidance and templates for data sharing. The sharing of best practice is also essential, including through informal and formal support networks, which play a key role in facilitating the exchange of knowledge, expertise, and innovative solutions.

Frameworks for partnership working

Effective collaboration requires clear frameworks and defined roles. These could be through more informal peer support networks, or more formal framework agreements, for example agreeing shared minimum monitoring and evaluation standards across London.

Clear frameworks for collaboration should define the roles of all stakeholders, outline funding contributions from each partner, and establish delegated decision-making authority for partnership leads.

Partnership working can also help to ensure SEND commissioners all have access to sufficient legal, procurement, and financial resource with sector-specific expertise.

C. Skills and expertise

Skills and expertise summary

This section outlines the findings from our skills and expertise audit. This audit brings together evidence from the stakeholder surveys and focus groups regarding the availability of skills and expertise to SEND leaders and commissioners across London's local authorities and ICBs. The analysis outlines current skills gaps, how expertise is shared, and where SEND strategic leaders and commissioners would benefit from further support. The key findings from this skills and expertise audit are summarised below:

- **Range of levels of expertise** – Across local authorities and ICBs there was a range of levels of expertise available for different aspects of SEND commissioning. This highlights the potential benefit of collaboration and expertise sharing.
- **Expertise sharing and peer support** – Many respondents relied on the knowledge and experience of their peers, both within their local authority and beyond. These were more often informal relationships rather than formal professional groups. Stakeholders highlighted the importance of collaboration and professional relationships for upskilling and professional development.
- **SEND commissioner roles** – SEND commissioners and strategic leads tend to see their roles as primarily about commissioning strategy, and much less about the finance, procurement and legal aspects of SEND commissioning.
- **Access to supporting finance, procurement and legal resources** – Only a small proportion of respondents indicated that the finance, procurement and legal aspects of SEND commissioning were main aspects of their role. They also identified a general lack of access to some of these professional support services, particularly in ICBs. Of those who reported having access to these resources, we often heard that resources were shared with other teams and that they often lacked SEND-specific expertise.
- **Support required beyond organisation** – Monitoring and evaluation, reviewing existing commissioning, and procurement were most commonly identified as the areas that would benefit from support beyond their local authority.
- **Other factors creating skills and expertise gaps** – Stakeholders raised the impact of other factors that limit the availability of skills and expertise, such as the lack of capacity, insufficient resources, and difficulties establishing professional relationships due to high staff turnover. Respondents also highlighted the lack of training for commissioning available.

Key skills gaps

Across London's local authorities, there was a wide range of levels of skills and expertise available for different areas of SEND commissioning. We asked local authority and ICB strategic leads and SEND commissioners about the **sufficiency of the expertise available for SEND commissioning across six key skill areas:**

1. Finance
2. Monitoring and evaluation
3. Contracting
4. Negotiation
5. Supplier identification
6. Procurement.

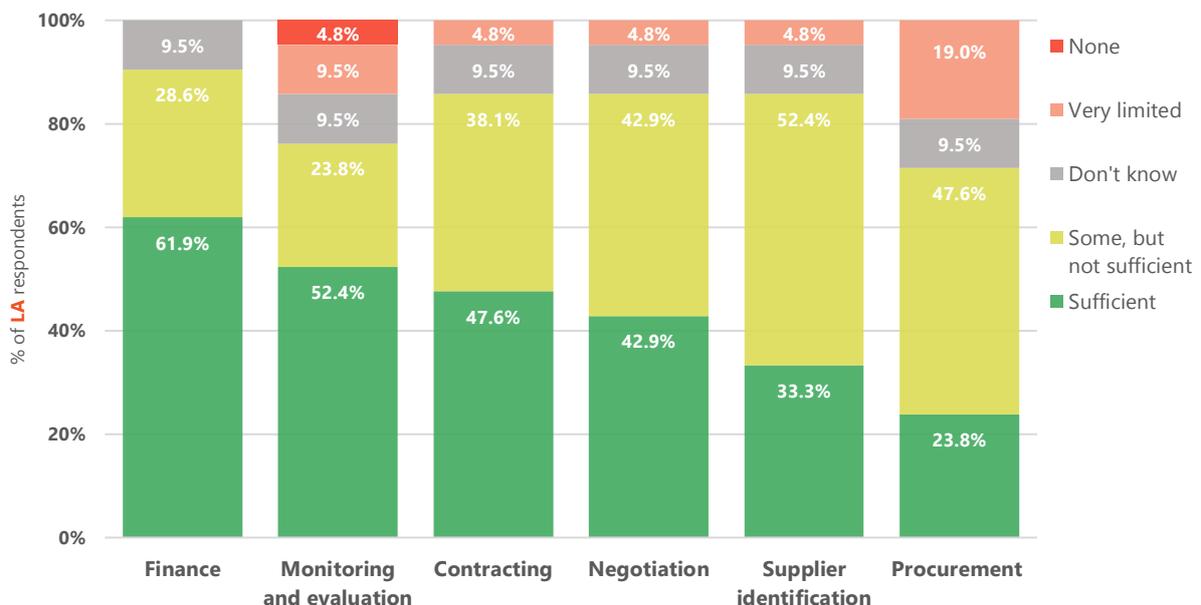
None of the respondents from ICBs, and just four of the 21 respondents from local authorities said they had sufficient expertise available to them across all six key skills areas. However, 67% of local authority respondents said they had at least 'some' expertise available to them across all six areas.

The skill area leaders most commonly identified as sufficient was finance, with 61.9% of local authority respondents feeling they have access to sufficient financial expertise. The area least commonly identified as sufficient was procurement, with just 23.8% of respondents feeling they had access to sufficient procurement expertise for SEND commissioning.

Additionally, even when procurement expertise was available, stakeholder feedback suggested that this was often not 'nuanced to the SEN context', suggesting that more tailored expertise and relevant sector knowledge would be beneficial. Stakeholders gave similar feedback on legal expertise, with some reporting that legal resources are 'shared with other local authorities and [legal personnel] do not have SEND-specific knowledge'.

The availability of monitoring and evaluation expertise was also very mixed, with some respondents saying that there was no, or very limited expertise, available, while only half reported sufficient monitoring and evaluation expertise in their local authority.

Figure 7. Please rate the level of expertise available for SEND commissioning in your LA

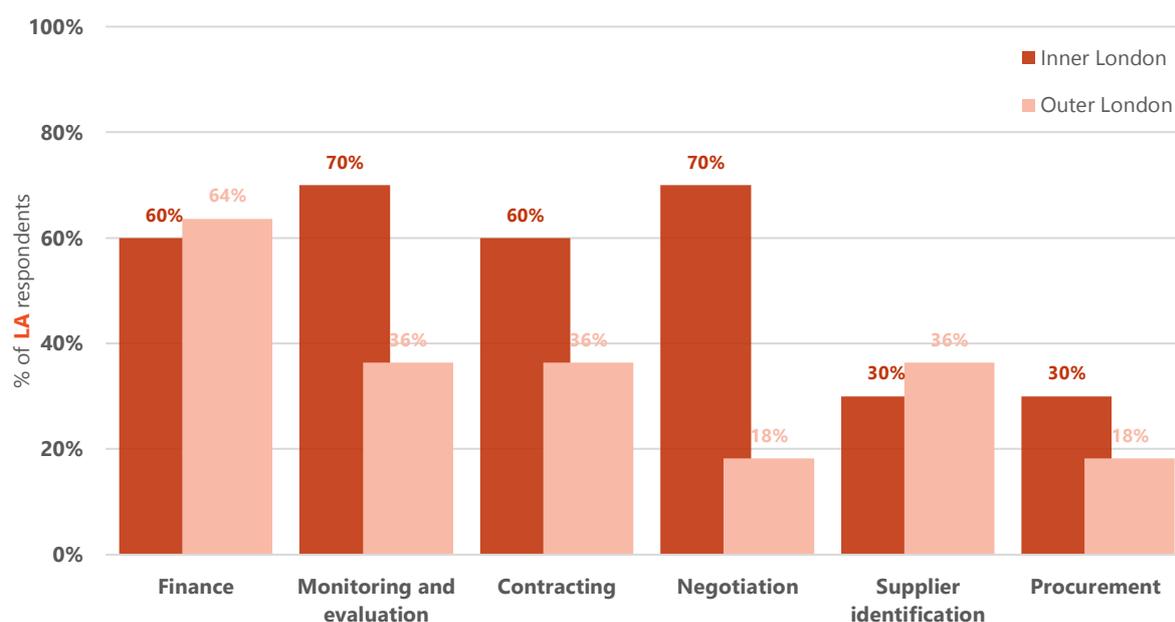


There are some particularly large skills and expertise gaps in outer London local authorities. In fact, the proportion of strategic leaders and SEND commissioners who said there was at least some expertise available across the six skill areas was 80% in inner London, compared

to 55% in outer London. From the chart below, we can see that the largest gaps between inner and outer London were in contracting, negotiation, and monitoring and evaluation.

For monitoring and evaluation, some outer London local authority stakeholders told us that, although sufficient expertise was available, there was a lack of capacity to carry it out effectively. The gap between inner and outer London in this skill area could therefore be due, in part, to the larger geographical area spanned by outer London local authorities. With a larger geographical spread of schools, colleges and other commissioned services, it becomes harder to monitor provision and commissioning across the borough.

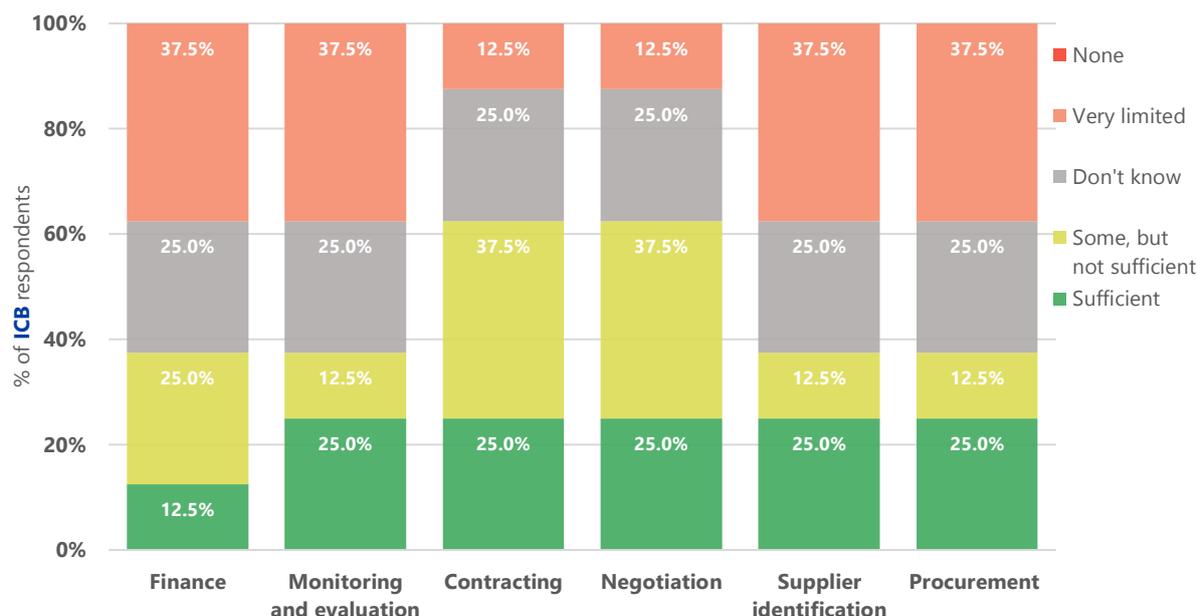
Figure 8: Inner and outer London local authority respondents who said there was sufficient expertise available



Compared to local authorities, **ICB stakeholders were even less likely to report sufficient expertise** available for SEND commissioning. In particular, finance was the skill area where the fewest respondents felt they had sufficient expertise.

A large majority, 88%, of ICB respondents said that they relied on expertise from other commissioners within their ICB. However, we heard from many respondents (from both local authorities and NHS bodies) that they had trouble building and maintaining relationships due to frequent staff changes. In particular, historical NHS restructurings, the high staff turnover rate, and the uneven distribution of expertise among teams have resulted in an 'unsettled' system with skills and expertise lost over time.

Figure 9. Please rate the level of expertise available for SEND commissioning in your ICB



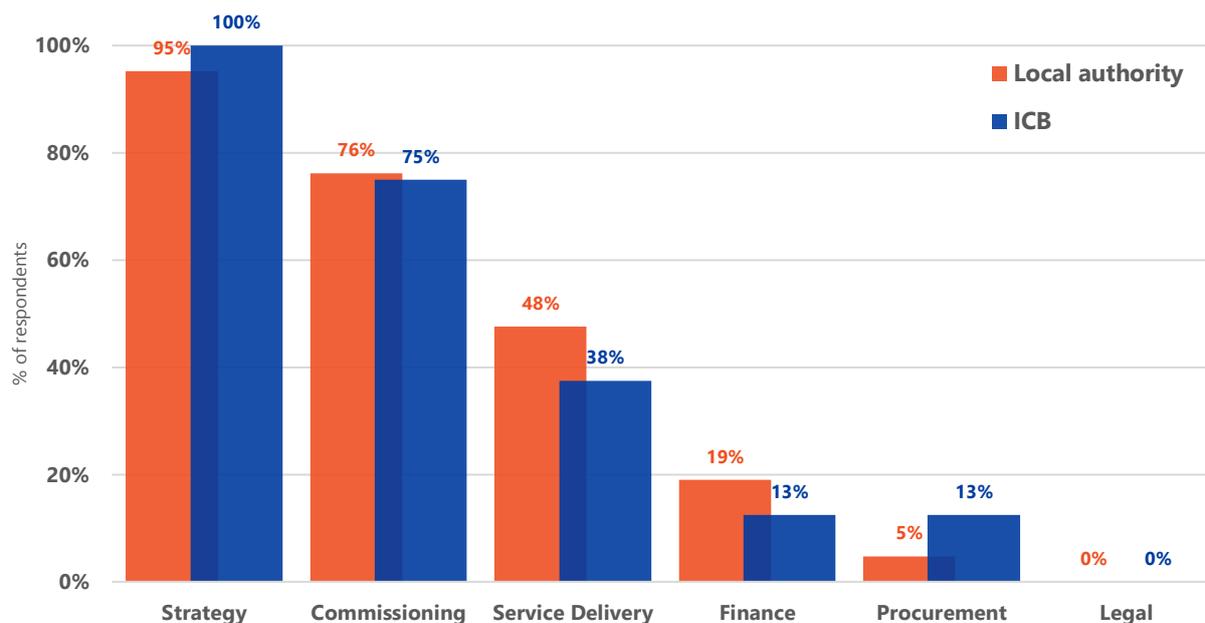
SEND commissioning roles

We also asked stakeholders to outline the main functions of their roles in SEND commissioning. This helped to identify where commissioners may benefit from further support or collaboration with others.

Main functions of SEND commissioner roles

The **majority of both local authority and ICB survey respondents said that strategy and commissioning were the main functions of their roles.** In contrast, less than one in five survey respondents said that finance was a main function of their role, and even fewer referenced procurement. No respondents across London's local authorities and ICBs identified legal as a main function of their SEND commissioning role. These functions tended to sit outside SEND service delivery and commissioning teams.

Figure 10. Which of the following best describe the main functions of your role?



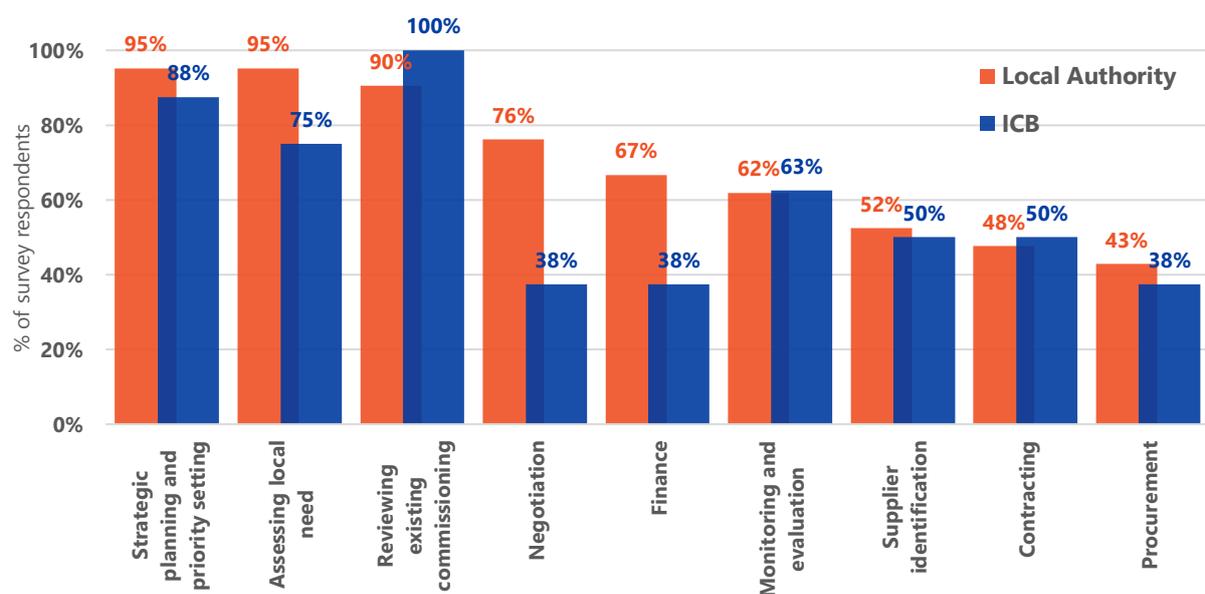
Specific aspects involved in SEND commissioner roles

Taking a more detailed look at what aspects of commissioning respondents were involved in, we see a large proportion of identifying strategic planning and priority setting; assessing local need; and reviewing existing commissioning as aspects of their role.

In local authorities, a slightly smaller proportion said that they were involved in negotiation and finance. However, for ICB SEND commissioners, these were far less common, with just 38% of respondents identifying each of them as an aspect of their SEND commissioning role.

The least commonly selected aspects of commissioning for local authority respondents were supplier identification, contracting and procurement.

Figure 11. Which of the following aspects of commissioning does your role involve?



SEND commissioner support requirements

We also asked stakeholders about their requirements for further support, looking both at where they already draw on external expertise, and where they feel they would benefit from further support.

Use of others' skills and expertise

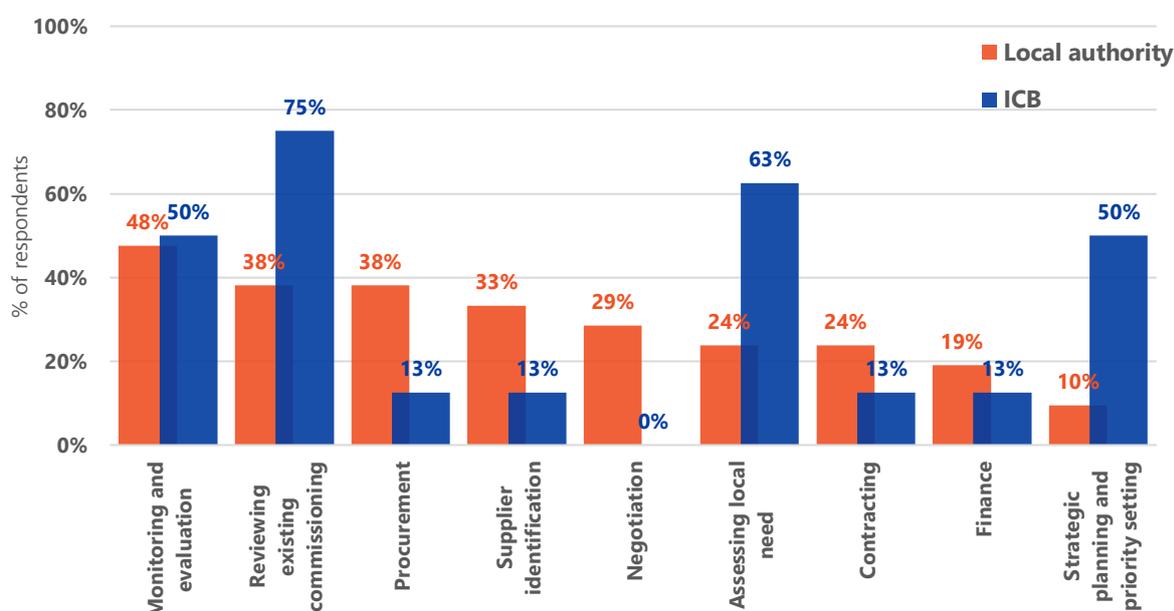
It was common to hear that SEND commissioners routinely draw on the experience and expertise of others. Almost two thirds (62%) of local authority respondents said that they rely on expertise from other commissioners within their local authority and 76% made use of informal relationships with other SEND commissioners.

Support requirements from beyond organisation

Across both local authorities and ICBs, many stakeholders identified aspects of SEND commissioning which they thought would benefit from support beyond their organisation. In particular, almost half of local authority respondents identified monitoring and evaluation as an area that would benefit from more support from beyond their local authority. This is an essential part of the SEND commissioning process, allowing commissioners to understand what is working well and what requires improvement.

Reviewing existing commissioning and procurement were also frequently identified as areas where support beyond the organisation would be useful. In fact, three quarters of ICB respondents identified reviewing existing commissioning as an area that would benefit from support beyond their ICB.

Figure 12. In which three aspects of SEND commissioning would you most benefit from support beyond your local authority or ICB?

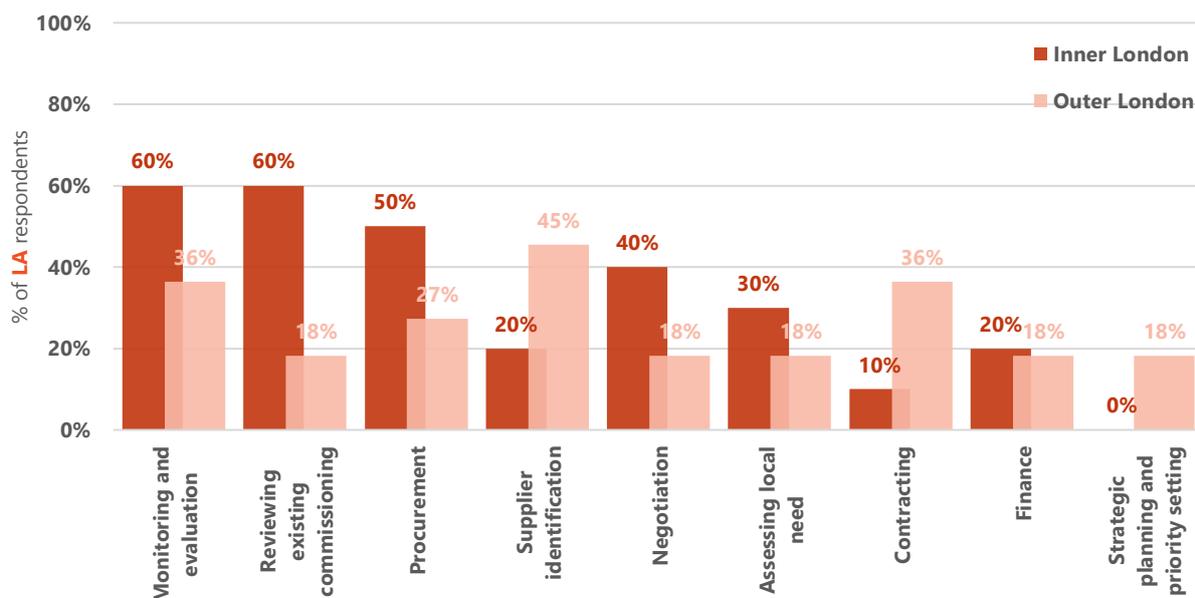


As with skills gaps, support needs also differed between inner and outer London local authorities. In general, inner London local authority respondents more frequently identified areas that would benefit from support beyond their local authority. This is despite the fact that, as we saw above, outer London respondents generally reported more skills and

expertise gaps. This may reflect the perceived value of peer support in inner London, where many of the same schools, colleges and other suppliers are commissioned by neighbouring local authorities.

In particular, inner London respondents more frequently reported monitoring and evaluation, reviewing existing commissioning, and negotiation as areas that would benefit from support beyond their local authority.

Figure 13. In which three aspects of SEND commissioning would you most benefit from support beyond your local authority? (Inner and outer London)



As shown in the chart below, there were also differences across London’s sub-regions. For example, stakeholders in the South West and North West sub-regions were more likely to want support with monitoring and evaluation than elsewhere.

Figure 14. In which three aspects of SEND commissioning would you most benefit from support beyond your local authority? (by sub-region)



Specialist supporting services for SEND commissioning

As has been outlined above, very few stakeholders we engaged saw finance, procurement and legal expertise as a main part of their SEND commissioning role. We therefore asked stakeholders about the availability of these important enabling professional services for SEND commissioning.

Finance, procurement and legal resourcing

When asked about their access to support in these areas of SEND commissioning, respondents identified a shortage of dedicated support across the board.

No survey respondents said they had access to fully dedicated legal resources for SEND commissioning, and almost none had access to dedicated procurement resources. The large majority of local authorities also reported sharing legal and procurement resources with other local authority teams, often with education teams.

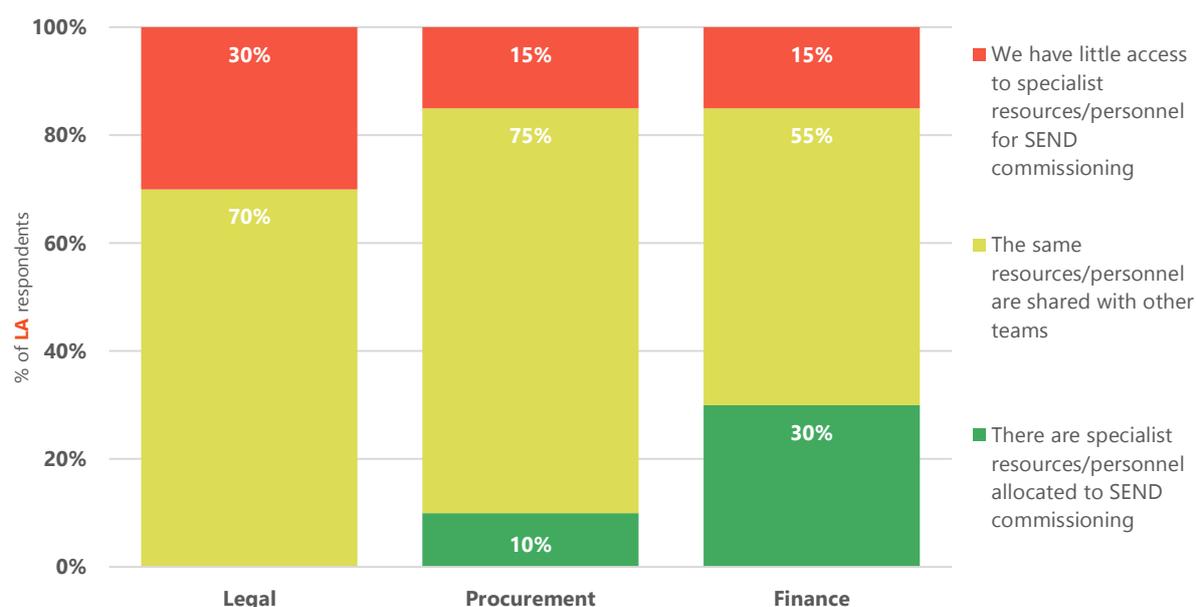
Dedicated financial resourcing for SEND commissioning is more common than dedicated legal or procurement resources, with 30% of surveyed local authorities having access to dedicated SEND commissioning finance resources. In some cases, the finance resourcing was dedicated to education and SEND. However, we also heard about the use of third party financial and legal services with little specific SEND sector knowledge. SEND or schools knowledge was felt to be particularly important for effective finance and legal support, though less so for procurement services.

“Finance is part of the general school-based finance, which is outsourced, while procurement are part of a wider commissioning team and do not have SEND specific knowledge.”

“There are dedicated finance officers who are expert in SEN finance.”

Only 10% of local authority respondents reported having dedicated procurement resources. None of the local authority respondents had access to dedicated legal resources, though a large proportion said they had some access to resources but that they were shared with other teams.

Figure 15. To what extent do you have access to dedicated support for SEND commissioning in the following areas? (local authority)



Looking at the differences between inner and outer London local authorities, we see slightly better access to these specialist professional resources in inner London. In particular, the proportion of respondents who said they had access to legal resources was higher in inner London than outer London. The proportion who said they had specialist financial resources for SEND commissioning was also higher among inner London respondents.

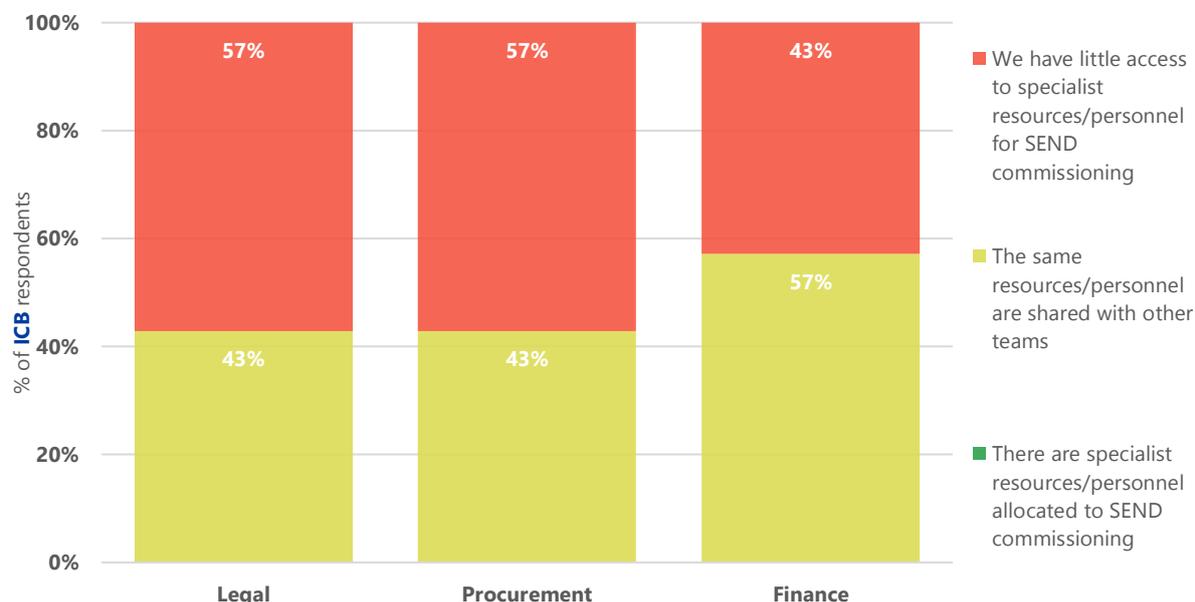
Figure 16. To what extent do you have access to dedicated support for SEND commissioning in the following areas



Access to these specialist resources was more limited in London's ICBs. Over half (57%) of respondents said they had little access to specialist legal and procurement resources for

SEND commissioning, and 43% of respondents saying they had little access to finance resources.

Figure 17. To what extent do you have access to dedicated support for SEND commissioning in the following areas? (ICB)



Importance of “real-world” expertise

As well as legal, procurement and financial services, focus group participants felt that those commissioning SEND placements and services also have limited access to colleagues with “real-world” experience working with young people with SEND, often relying on parent and carer networks for advice

In particular, it was felt that some, often high-cost, independent and non-maintained special school places were commissioned with very little discussion of the outcomes young people would be supported to achieve, and how these would be measured. Parents and carers felt that this could be addressed by commissioners having access to dedicated professionals with SEND experience.

D. Data for SEND commissioning

Data for SEND commissioning summary

This section sets out a new strategic approach to the use of data for SEND commissioning in London. This summarises our findings about the 'as-is' use of data for SEND commissioning in London, outlining the different types of data used by SEND commissioners, highlighting barriers to data sharing, and identifying data gaps. We then present a 'to-be' model for how London's local authorities and ICB could more effectively use data in SEND commissioning in future. The key findings include:

- **Clear demand for data for SEND commissioning** - SEND commissioners were clear that data is a valuable resource for commissioning. There is a clear demand for better access to data and for more sharing of data across London.
- **Use of online data sources** - SEND commissioners do frequently use both online and internal data sources to support their work, though these are limited in scope and data quality is variable.
- **Data as a barrier** - Information and data sharing was identified as one of the most important barriers to collaboration on SEND commissioning across London.
- **Data availability gap** – SEND commissioners would like a wide range of data to support the commissioning of independent and non-maintained school placements, including on costs and outcomes, but the availability of this data was very mixed.
- **Barriers to sharing health data** – Stakeholders commonly expressed uncertainty about sharing personal data, particularly when it related to health records. There was a lack of confidence and understanding about how this data can be safely and legally shared.
- **New shared data tools** – As part of this project, Mime have built two new data tools which collect and share data on specialist providers across London, aimed at support SEND commissioners with strategic decision-making, supplier identification and negotiations.
- **Role for a pan-London SEND commissioning hub** – LIIA should establish a pan-London SEND commissioning hub, and a SEND commissioning data working group with representatives from local authorities and ICBs, to lead the development and implementation of better data collection and sharing for SEND commissioning.

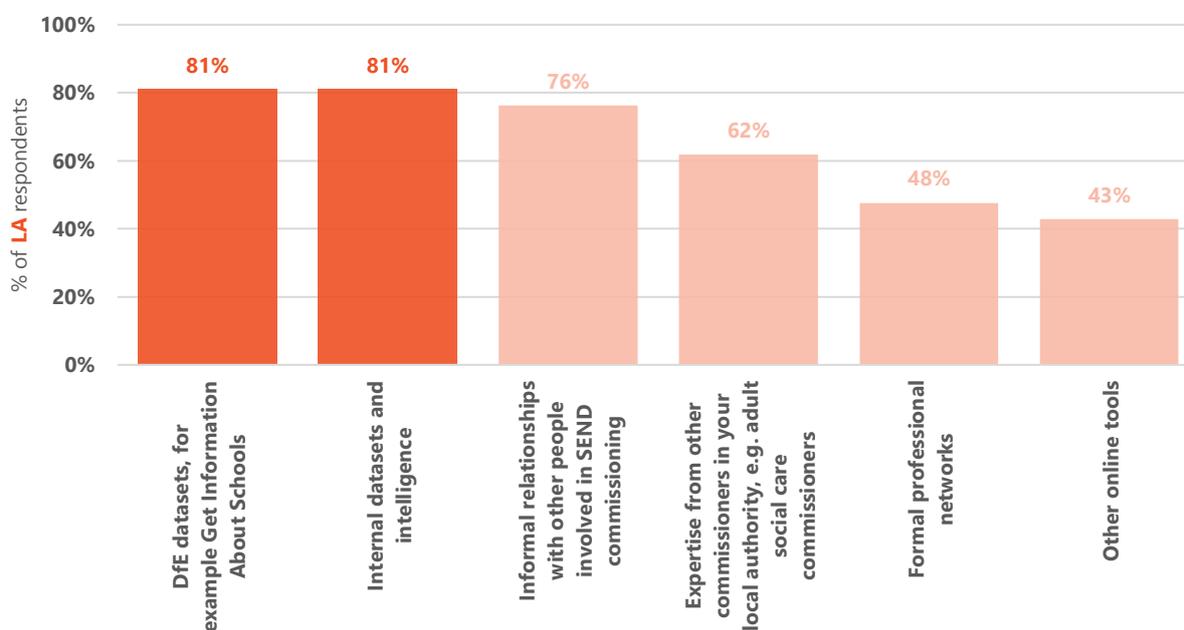
The 'as-is' use of data for SEND commissioning

Data as a key resource

Among local authority stakeholders, **data was the most commonly used resource for SEND commissioning**. Specifically, public datasets, such as the DfE's Get Information about Schools (GIAS) dataset, and internal datasets, were used by 81% of local authority survey respondents.

DfE datasets like GIAS were used to find information on schools and colleges, for example on the primary need specialisms and school age ranges they support. Interestingly, a larger proportion of inner London respondents (100%) reported using internal datasets compared to outer London (64%).

Figure 18. Which of the following existing resources do you use when commissioning SEND provision and services in your LA?

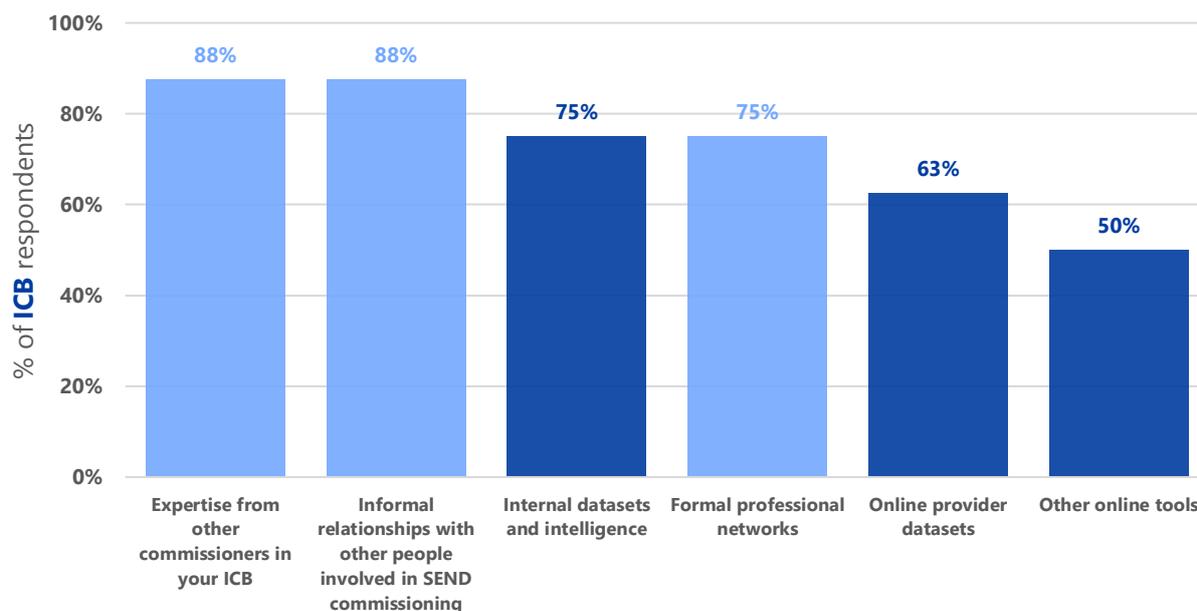


For SEND commissioners in London's ICBs, other sources of information, such as colleagues' expertise, were more commonly used than datasets. However, again both internal and online datasets were commonly used, with the majority of survey respondents reporting making use of both. In particular, 75% of ICB survey respondents reported using internal datasets and intelligence as a resource for SEND commissioning, the third most commonly referenced resource.

Although lower than among local authority stakeholders, 63% reported using online provider datasets, with 50% using other online tools.

The slightly less common use of data among ICBs may be partly driven by difficulties with sharing health-related data, both between NHS organisations and with local authorities.

Figure 19. Which of the following existing resources do you use when commissioning SEND provision and services in your ICB?



Data on independent and non-maintained providers

SEND commissioners were clear that they would like access to **better data to support the commissioning of independent and non-maintained school placements**. This includes data on the specialisms, cost, and quality of providers.

We asked stakeholders to identify the three most important pieces of data for commissioning independent and non-maintained school placements. Placement costs by school was the most commonly cited data point, with 76% of local authority respondents reporting that this was one of the three most important pieces of data. Many were also interested in a placement cost breakdown by primary need (43%).

As well as placement costs, around half of the survey respondents identified information on the specific SEND needs provided for by the school, as well as data on the academic outcomes of their pupils with SEND as one of the three most important data points.

Survey respondents also fed back that data on how well schools could meet the specific outcomes listed in an EHCP was key.

In addition to the data points asked about in the survey, stakeholders felt that it would be useful to access the following additional data on individual providers to guide commissioning:

- Pupil destinations, for example success at entering employment
- Ofsted rating
- Profit margin and openness to negotiation

*“What’s really important to be able to ascertain is **how well the school are meeting section F of the EHCP**, this is often where we find we are able to **make savings or design better provision**”*

Figure 20. Which are the three most important pieces of data and intelligence on independent and non-maintained special school places?

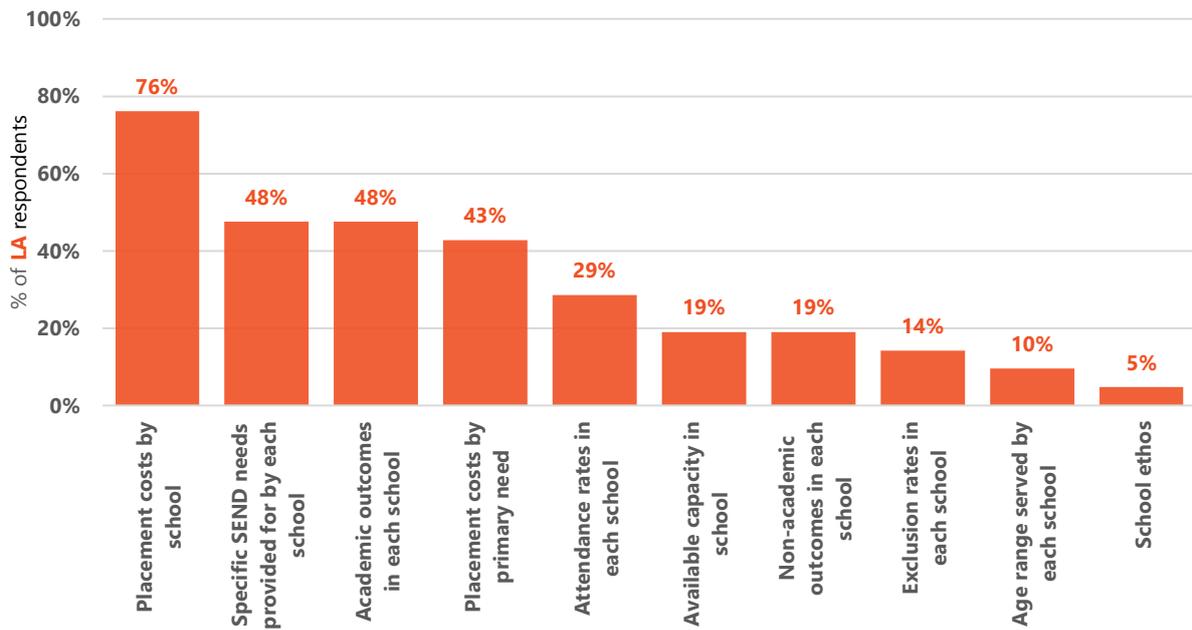
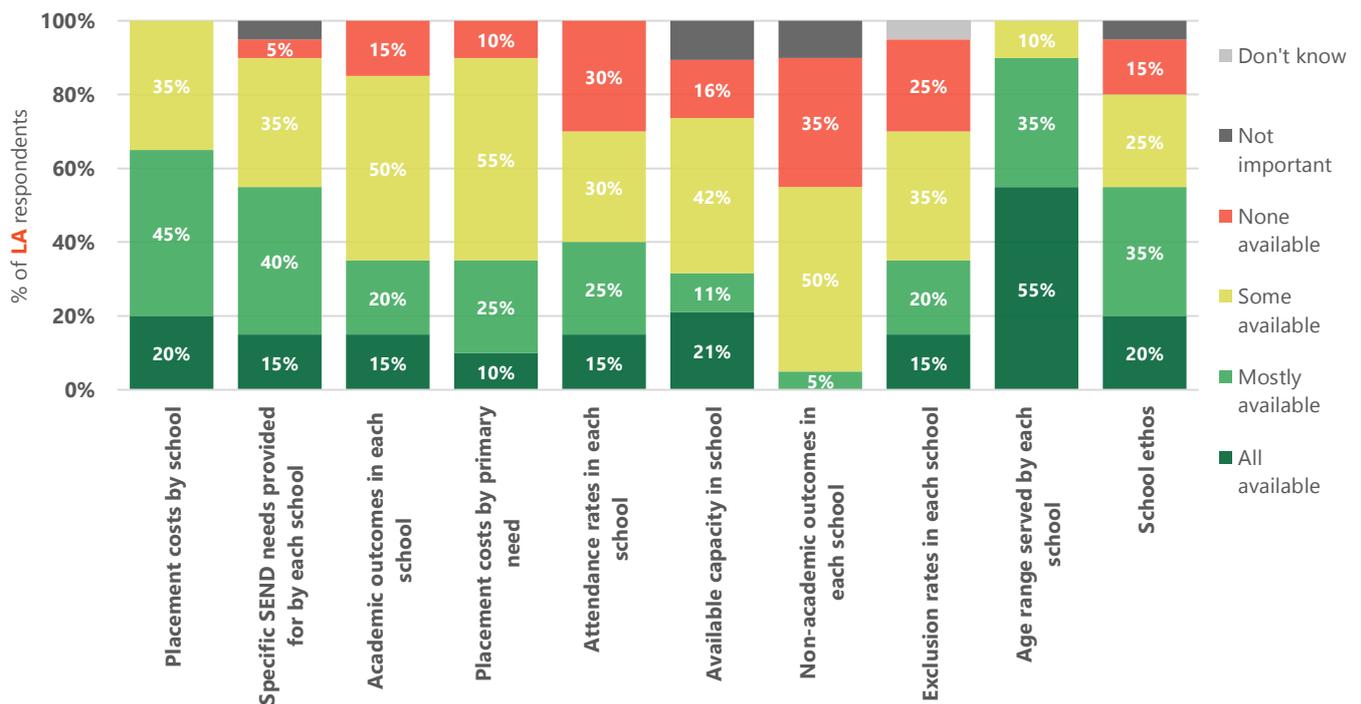


Figure 21. To what extent was each of the following data sources available?



When asked how easily accessible each of these data points were to SEND commissioners, responses were mixed.

Despite being the most commonly cited as important data, only 65% of respondents reported placement costs by school as being all or mostly available. Similarly, just 35% said cost by primary need were all or mostly available.

The specific SEND needs supported by each school was also not widely available, with only around half of respondents saying this was all or mostly available. This may reflect concerns about the data quality of the information in the GIAS dataset on schools' primary need specialisms.

Strikingly, 15% of respondents said that they did not have access to any data on the academic outcomes of pupils with SEND in independent or non-maintained schools, and 30% said they had no access to attendance data.

Data barriers to effective SEND commissioning

Stakeholders were clear that issues around information and data sharing was one of the most important barriers to effective SEND commissioning in London. In fact, **information and data sharing was the second most common barrier identified** across all survey respondents, with only resource constraint more commonly identified. The most substantial barriers were around sharing person level data on young people with SEND, but supplier level and strategic data sharing is also limited.

93%

Data sharing was also commonly referenced as a barrier to more effective commissioning in the focus group discussions. In particular, stakeholders referenced challenges with data sharing with the NHS. This was even identified as an issue between NHS providers, particularly when the young person with SEND was resident in a different local authority to their NHS providers or GP surgeries.

Of NHS and local authority respondents **identified information and data sharing as either 'somewhat a barrier', or a 'significant barrier'** to collaboration

As well as practical barriers, stakeholders reported cultural discomfort with data sharing and uncertainty around the implications of legislation, including the GDPR, on what can and cannot not be safely shared. However, stakeholders did point to ongoing efforts to establish better data sharing and identified small areas of good practice, for example in South West London.

Data Strategic Plan 2023-2028, South West London ICB

This plan 'describes how NHS and Local Authority Partners across South West London will use data and work together over the next five years to support delivery of joined up, person-centred care across our health and care system.' This includes plans for a new data governance framework and changes to organisational data cultures.

<https://www.southwestlondon.icb.nhs.uk/wp-content/uploads/2025/01/NHS-South-West-London-Data-Strategic-Plan-2023-to-2028.pdf>

There was again a difference between inner and outer London local authorities with all inner London local authority respondents identifying data sharing as 'somewhat' or a 'significant' barrier, compared with 73% of outer London local authority stakeholders.

When asked what the specific barriers were to better and more comprehensive data sharing, respondents identified a wide range of issues, including:

- Lack of standardisation of data collection
- Different data systems
- Caution and a lack of understanding of legal requirements, including around GDPR
- Organisational cultural reluctance to share data
- Uncertainty about data quality

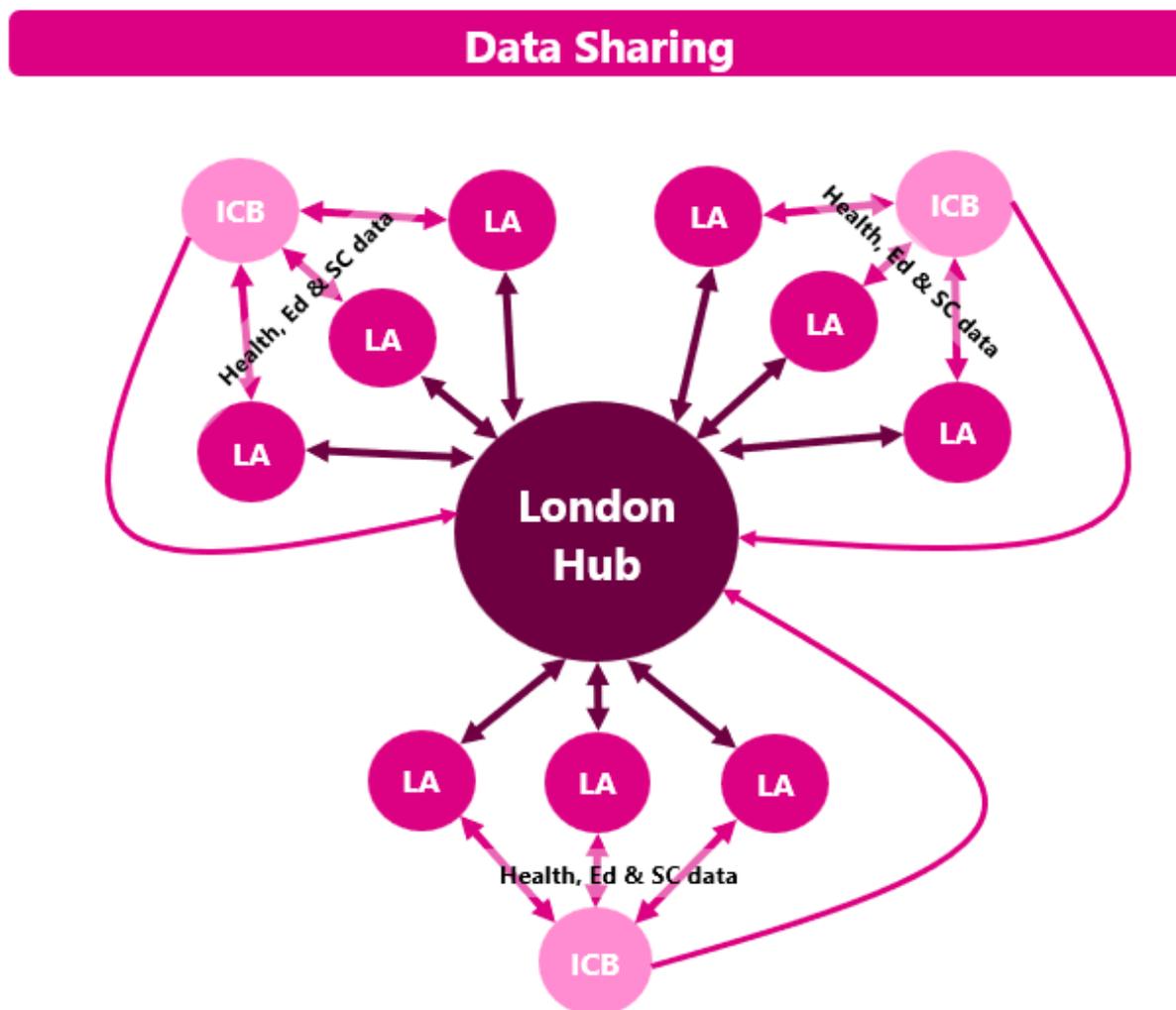
As well as preventing more effective collaboration, stakeholders were clear that the lack of data sharing results in duplication of effort across organisations, with the same data being collected by different people in different ways.

The 'to-be' model for data for SEND commissioning

As described above, stakeholders were clear that data is a key enabler of more effective SEND commissioning. However, there are clear data gaps, particularly around the commissioning of independent and non-maintained placements, and several barriers to better data sharing.

In this section we therefore outline a 'to-be' approach to the use of data for SEND commissioning in London's local authorities and ICBs. As shown in the diagram below, this model includes a substantial role for a London hub, as well as the establishment of widespread two-way organisational data sharing.

Figure 22: The 'to-be' model for data for SEND commissioning



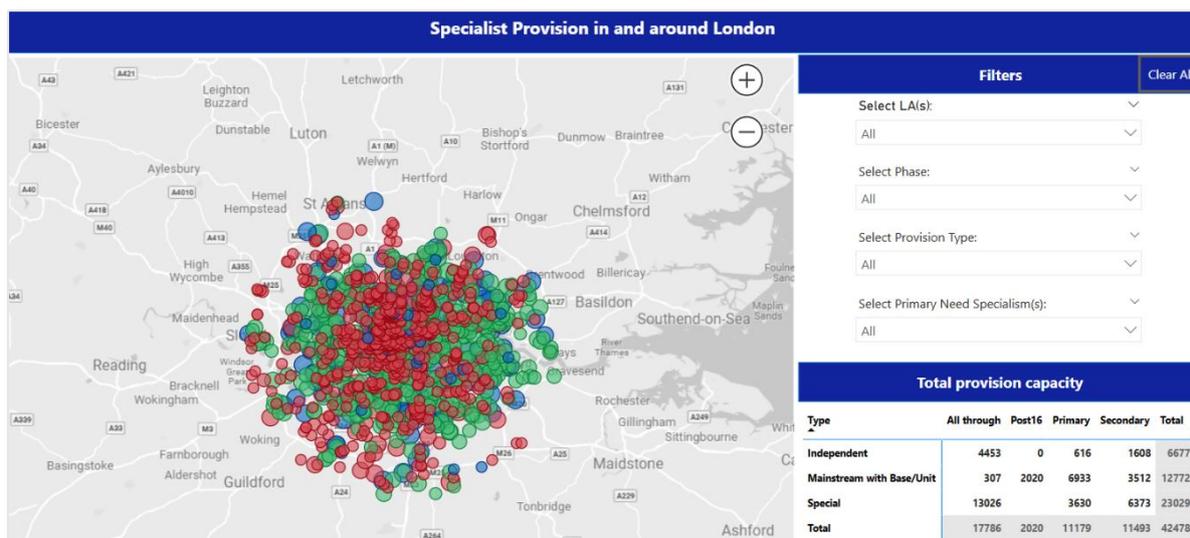
The specific steps to bring about this to-be model are outlined in the recommendations section of this report.

Shared data tools

As part of this project, Mime have developed two new data sharing tools aimed at addressing the gaps identified:

1. **A specialist supplier identification tool** – A pan-London online tool for identifying specialist school placements. This will combine several data sources into an interactive Power BI map with data from a single, central dataset with key information for commissioning, accessible to all London commissioners. This dataset includes information on each school's capacity, workforce, absence and exclusion rates, and the specific SEND needs supported.

Figure 23: Specialist supplier identification Power BI tool



2. **Independent and non-maintained provider strategic data collection** – A local authority level data collection, which will feed into a shared data tool with strategic information on independent and non-maintained specialist providers. The data collection tool allows commissioners to report their own data, including:

- Average placement cost by provider
- Average placement cost by primary need
- Academic outcomes achieved by young people with EHCPs
- Absence and exclusions of young people with EHCPs
- Non-academic outcomes achieved by young people with EHCPs, including health outcomes
- The SEND needs and level of complexity supported by the provider
- Openness to fee negotiations

This data will be combined with the returns from other London local authorities and presented in a shared Power BI tool. SEND commissioners can then explore the information on costs and outcomes achieved to inform their own commissioning decisions. Crucially, this collection will also expose where the same providers are charging significantly different rates to different local authorities.

Where possible, this data would be linked with publicly available data from a range of sources, for example of Ofsted rating or financial information from Companies House or the Charity Commission.

This tool should complement existing efforts to capture more data on independent providers. This includes the Commissioning Alliance’s work to collect detailed financial data from providers, in order to support local authorities to challenge year-on-year fee increases.

and distribute information on planned expansion of specialist provision including additional resource base, SEN unit and special school capacity.

- **Capacity building, guidance and templates** – The London hub should take a lead role in providing resources for data sharing and building confidence among SEND commissioners. This should include training and guidance around the legalities and practicalities of data sharing, covering themes like pseudo-anonymity and secure data transfer. In addition, the hub should share templates for data sharing agreements between local authorities and ICBs, which can be quickly adapted to support cross-organisational data sharing.

Establishing cross-organisational data sharing

One of the clearest barriers to more effective SEND commissioning was data and information sharing across organisations. Therefore, on top of the pan-London work, the 'to-be' model for the use of data for SEND commissioning must address two-way cross-organisational data sharing between local authorities and ICBs. This should include person-level information held by the local authority education and care teams, and by the ICB.

Facilitated by the London hub, organisations should establish data sharing agreements, protocols and systems within their sub-regions, and then beyond. This should provide for seamless and compliant data sharing between organisations involved in SEND commissioning. Some sub-regions have established more developed approaches to data sharing so will be in a position to progress this work more quickly. Learnings from these sub-regions should therefore be shared back with the London hub and distributed across London.

E. Market position statement

Market position summary

This section presents the market position statement for SEND in London. This brings together data from SEN2 returns shared by London local authorities, with public DfE datasets. The analysis in this section outlines recent trends in SEND need in London, highlights the key takeaways from our need forecast, and identifies existing and future provision gaps. Together, this should directly inform SEND commissioning priorities. The key findings from the market position analysis are:

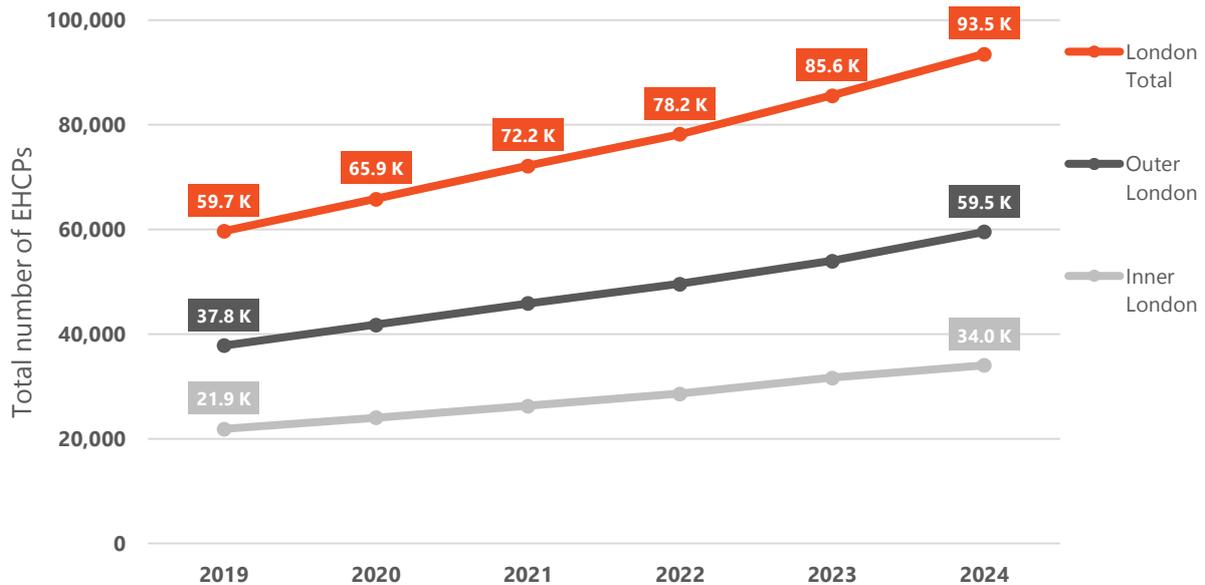
- **Cohort growth forecast to continue** – In spite of year on year falls in the number of 0 to 25 year olds in London, London’s EHCP cohort has grown rapidly in recent years. This growth is forecast to continue over at least the next ten years. The growth has been driven by large increases in the number of requests for an EHCP over the past few years. The scale of the future growth will depend on local policies and practices, as well as national government decisions.
- **Population changes dampen the growth** – Due to lower birth rates and net migration of young families out of the capital, the population of young Londoners has been falling. While this is having a significant impact on school rolls, the growth in the EHCP cohort remains much larger than the movement out of young people with EHCPs.
- **Forecast growth in need at secondary and post-16** – As the large primary school cohorts age into secondary, the secondary age EHCP cohort will grow. We therefore expect to see a large growth in the need for secondary phase specialist provision in London in the next few years.
- **Rise of speech, communication and language needs** – With one in four *new* EHCPs being issued for a primary need of speech, language and communication needs (SLCN), this need group is forecast to grow substantially, representing an increasingly large proportion of the EHCP cohort. While autistic spectrum disorder (ASD) is likely to remain the largest need group, SLCN needs will continue to grow, particularly among the secondary school age cohort.
- **Insufficient state-funded specialist provision** – London’s specialist provision has not grown at the same pace as the EHCP cohort, and there has been large increase in the numbers of young people with EHCPs placed in mainstream schools. London’s state-funded specialist providers most commonly supports young people with ASD, SLCN and learning difficulties, while London’s independent specialist provision is more often focused on SEMH needs.
- **Provision gaps, particularly for ASD and SEMH needs** – Independent provision is already being relied on, particularly at secondary and post-16. This is often to meet the needs of those with primary needs of SEMH or ASD, even despite the prevalence of state-funded provision for ASD needs. There is also a gap in SLCN provision, the need for which is forecast to grow. As the secondary and post-16 cohorts grow further, these provision gaps are likely to widen unless SEND commissioners can develop more state-funded provision to meet these needs.

Recent trends in London's EHCP cohort

EHCP cohort growth

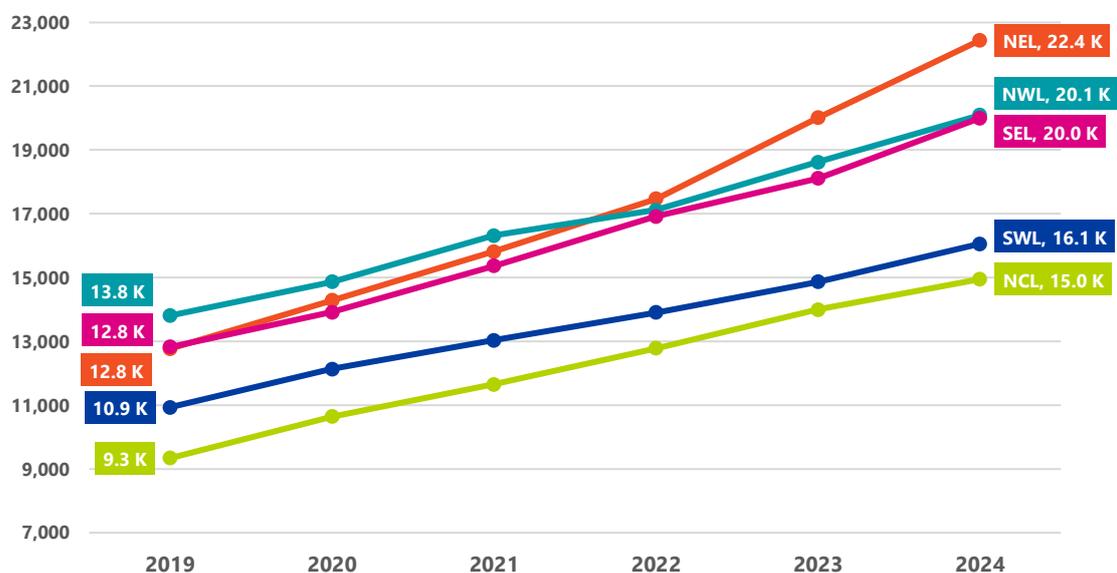
Before looking at the need forecast, it is important to understand recent trends. **Since 2019, the total number of young people in London with an EHCP has increased rapidly** from around 59,700 in 2019, to over 93,000 in 2024. Our forecast projects that this number will continue to increase over the next ten years, peaking at around 150,000 young people with EHCPs (more detail below).

Figure 25. Number of EHCPs between 2019 and 2024.



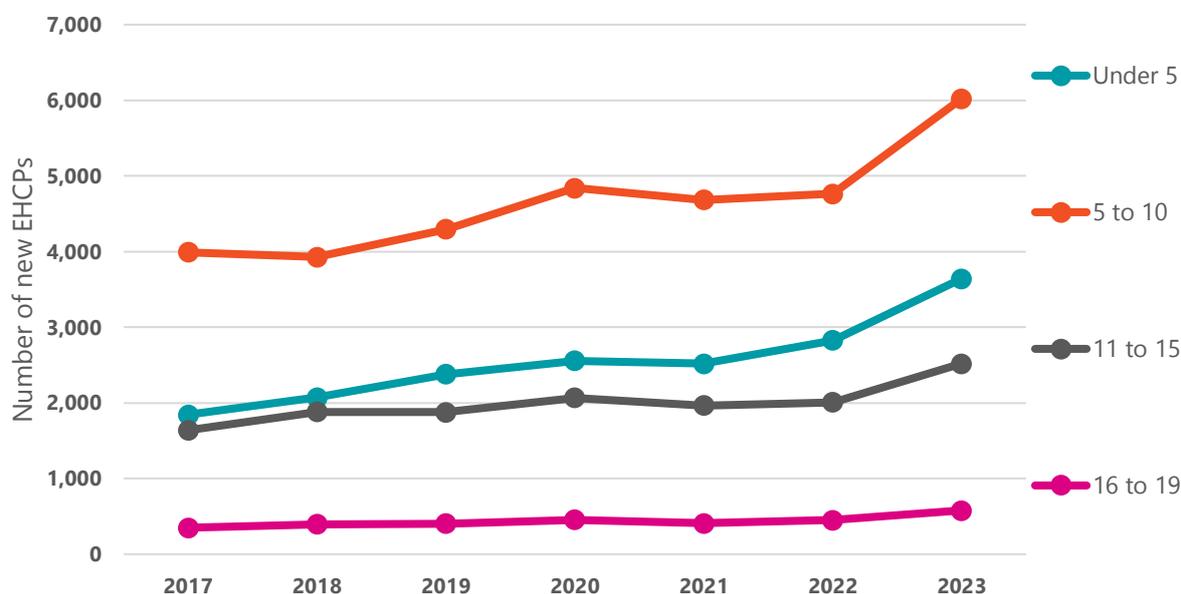
This growth has been present in both inner and outer London, and across all five of London's sub-regions. However, in recent years there has been a particularly large amount of growth in the EHCP cohort in North East London.

Figure 26. Number of EHCPs between 2019 and 2024 across London subregions.



Looking at the growth by age group reveals that there has recently been particularly large growth in the number of *new* EHCPs for five to ten year olds, rising above 6000 new plans. The growth in EHCPs among primary school age London residents has created a primary school age cohort that is much larger than historic primary school age cohorts. This is likely to mean large growth in the secondary school age group in the coming years.

Figure 27. Number of *new* EHCPs for London residents per age group.



Increases in requests for EHCP assessment

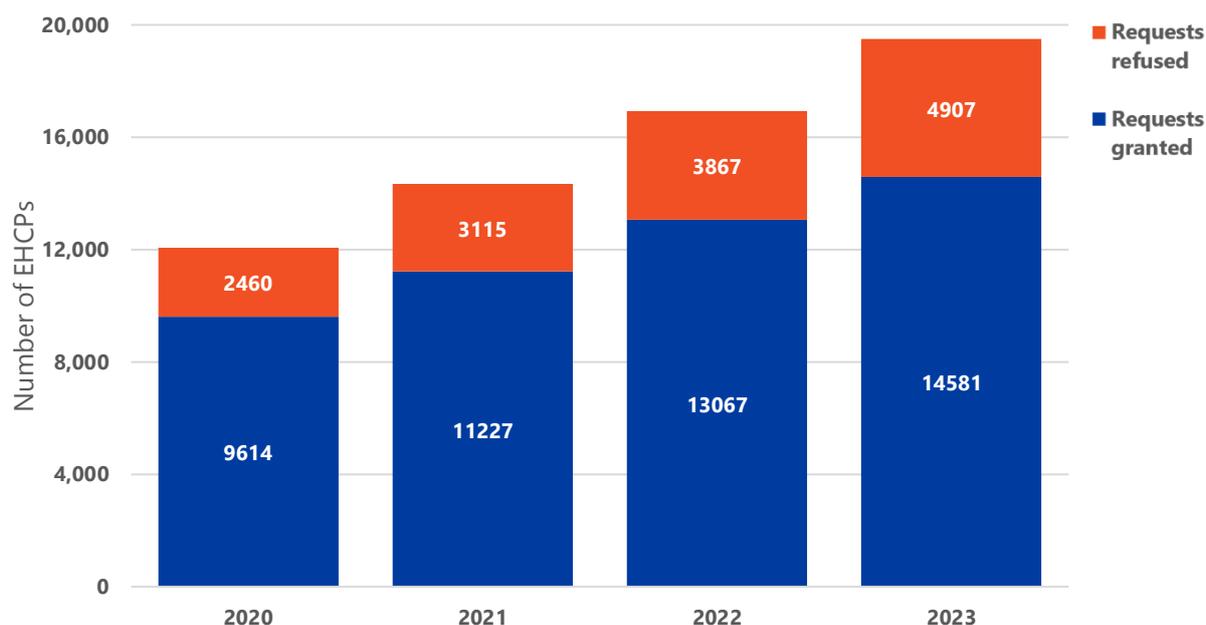
The biggest driver of cohort growth in recent years has been a growth in the number of requests for an EHCP assessment. In London, there has been a substantial increase in the number of requests for assessment for an EHCP, with almost 20,000 new requests submitted in the most recent year on record, compared with just 12,000 three years earlier. As a proportion of the under 25 year old population, this is equivalent to an increase from 0.45% of all young residents requesting an EHCP assessment, to 0.72%. This most recent figure means that one in every 140 young Londoner having a new EHCP assessment request in the year.

1 in 140

0 to 24 year old London residents requesting an EHCP assessment in one calendar year

Alongside the increase in the number of requests for an EHCP assessment, the proportion of requests for assessment in London that are refused has also increased. In the most recent year on record, over a quarter (25.2%) of requests were refused. While this has slightly dampened the cohort growth, the number of requests *granted* has still increased substantially year on year. In some cases, these requests are for young people who have previously had their request refused.

Figure 28. Number of granted and refused requests for EHCP assessment.



The changing primary need profile

While primary needs are never a perfect indication of the type and complexity of young people's needs. Additionally, some stakeholders cautioned that primary need categories can be understood differently across different local authorities, and others told us that in young people waiting for an autism diagnosis are assigned a different primary need in the interim.

However, taken in aggregate and over time the primary need patterns can reveal important trends that have implications for provision. In particular, comparing the need makeup of existing EHCPs with those of new EHCPs being issued can reveal which need groups are likely to grow in the coming years.

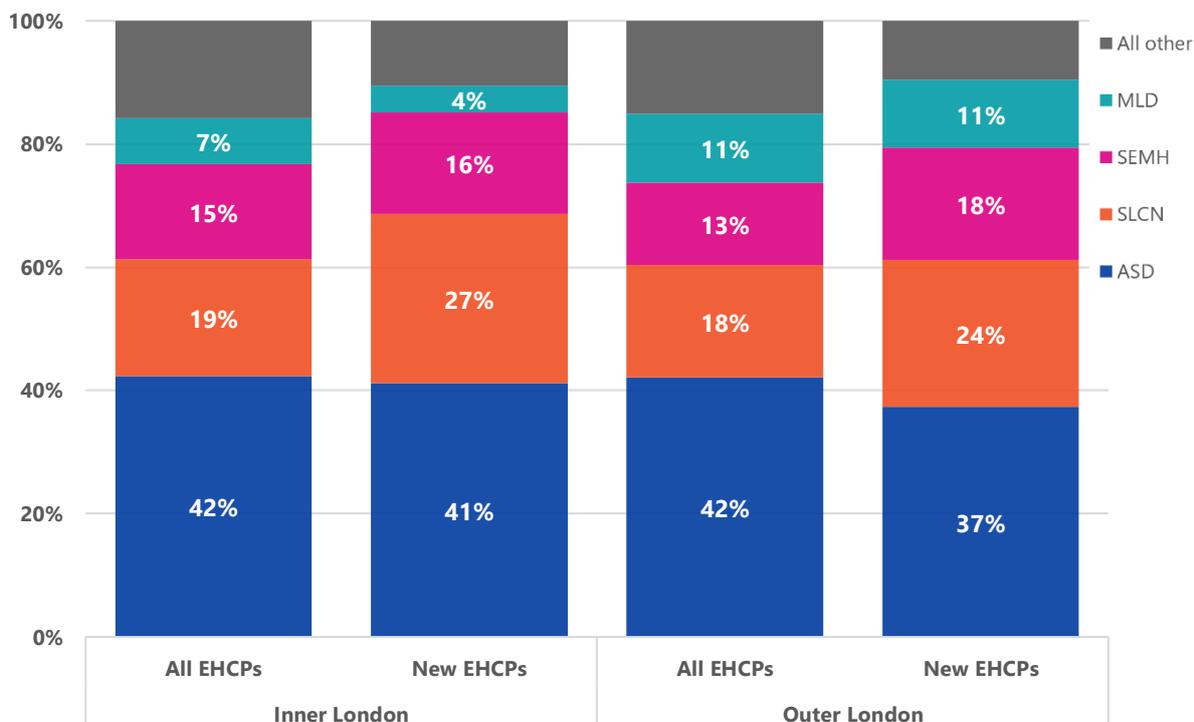
In London, more than two in five residents with an EHCP have a primary need of ASD, the single largest need group. Speech, language and communication needs (SLCN) is the second most prevalent primary need among the EHCP cohort at 19% of all EHCPs. This is also the fastest growing need group, with 26% of all new EHCPs issued for a primary need of SLCN. SEMH needs also appear to be growing, representing 17% of all new EHCPs compared with 14% of existing EHCPs in London.

Figure 29. Primary need breakdown of total and new EHCP cohort in London in 2024



While both SLCN and SEMH are growing in inner and outer London, there are slight differences in the need profile in inner London compared with outer London. The proportion of new plans issued for a primary need of SLCN is larger in inner London, pointing to faster growth in that cohort, while in outer London there a larger proportion of new plans are for SEMH needs. This points to slightly different future trends in the need profile in inner London and outer London, which could have implications for SEND commissioners.

Figure 30. Primary need breakdown of total and new EHCP cohort in inner and outer London in 2024



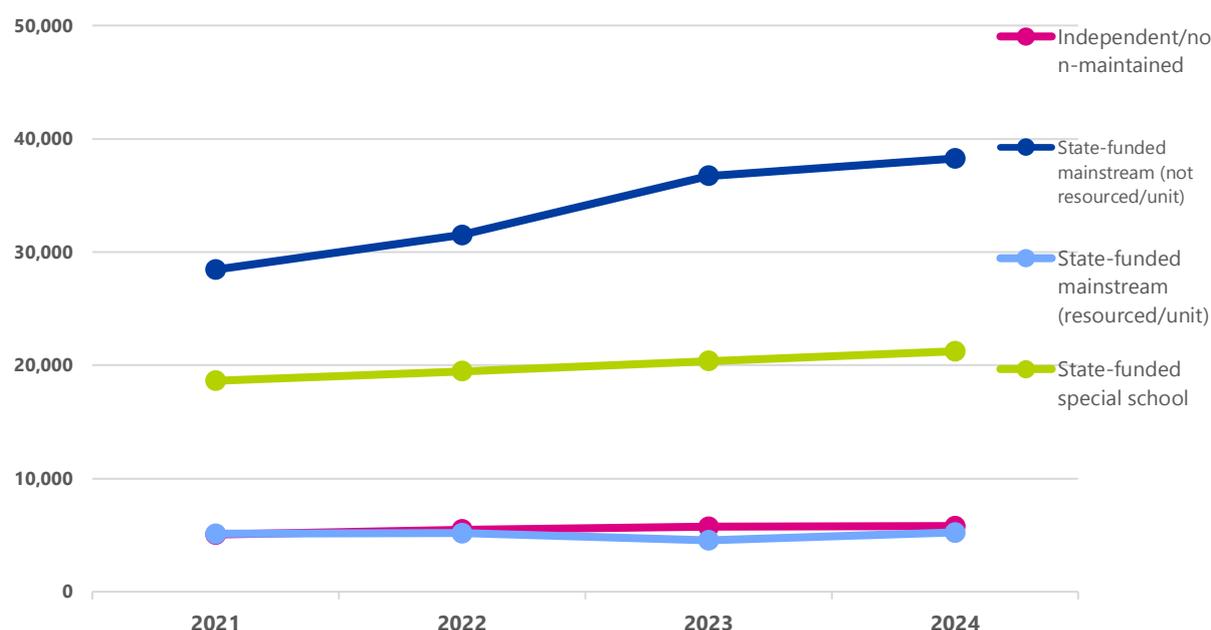
Though the data is incomplete, there are also differences in primary need makeup across London’s sub-regions. In North East London, a particularly large proportion of new EHCPs are for primary needs of SLCN, suggesting faster growth in the SLCN cohort than elsewhere. In contrast, SEMH accounts for a larger proportion of new EHCPs in North Central and South West London compared with the other three sub-regions. Understanding these different need patterns and trends across London will be important for determining sub-regional priorities.

Specialist provision in London

Growing numbers in both special and mainstream schools

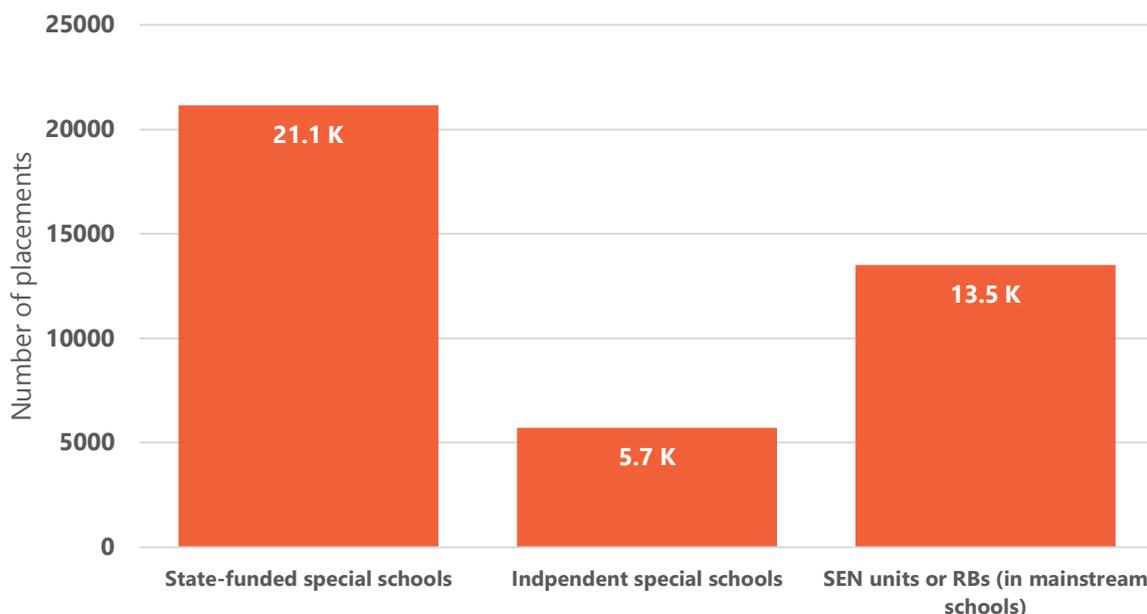
Across London, the most common provision type for young people with an EHCP has remained state-funded mainstream schools, with 41% of the cohort placed in mainstream schools (not in resourced provision or SEN units). In contrast, as the cohort has grown, the proportion of young people with an EHCP placed in state-funded special schools has fallen, from 26% of the cohort in 2021 to 23% in 2024. It is important to note that, while the *proportion* of the cohort placed in state-funded special schools has fallen, the *number* in these schools has grown.

Figure 31. Placement of young people with an EHCP in London between 2021 and 2024



In London, there are over 40,000 places available in dedicated specialist provision, across state funded and independent special schools, plus SEN units and resource bases attached to mainstream schools. The large majority of these placements are in state funded special schools, where roll numbers have grown substantially over the past few years.

Figure 32. Total specialist provision capacity in London (as at April 2025)



Primary need specialisms of London’s provision

Across all types of specialist providers in London, ASD was the most common primary need specialism. In fact, 71% of state-funded special schools, 60% of resource bases and SEN units, and 58% of independent special schools listed ASD as one of their specialisms.

A large proportion of state-funded special schools provide specialist support for pupils with SLD (53%), MLD (42%) and SLCN (40%).

Figure 33. London’s state-funded special schools - primary need specialism.

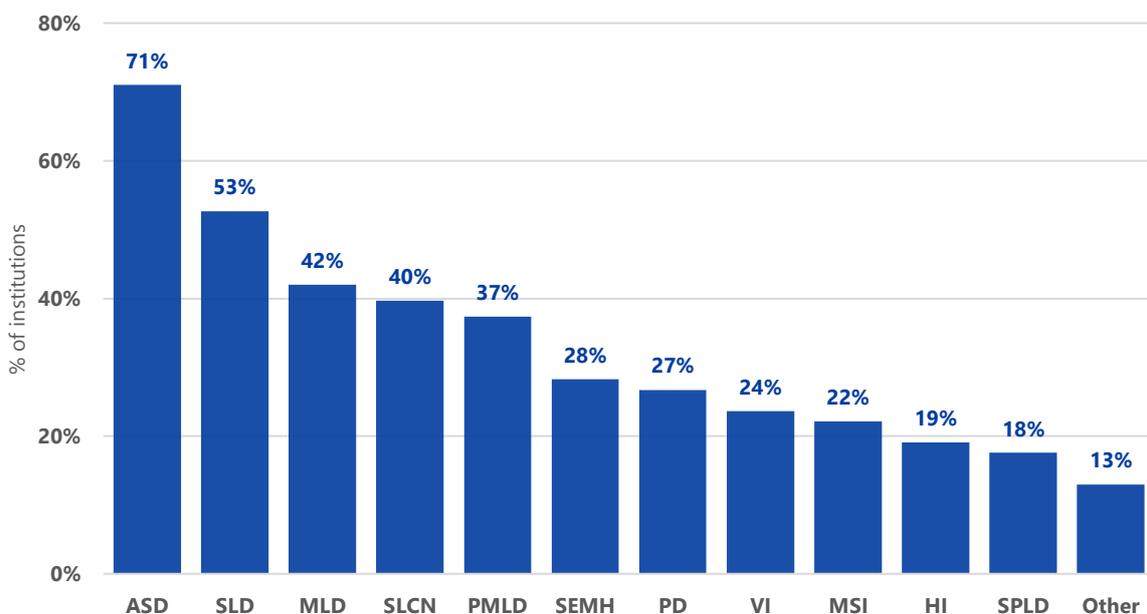
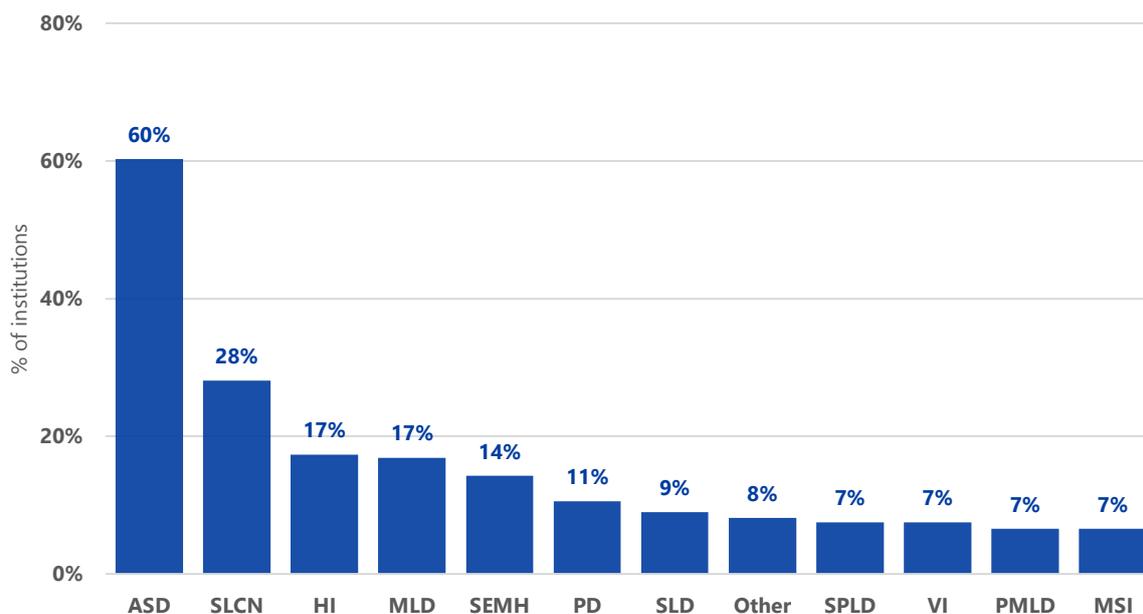
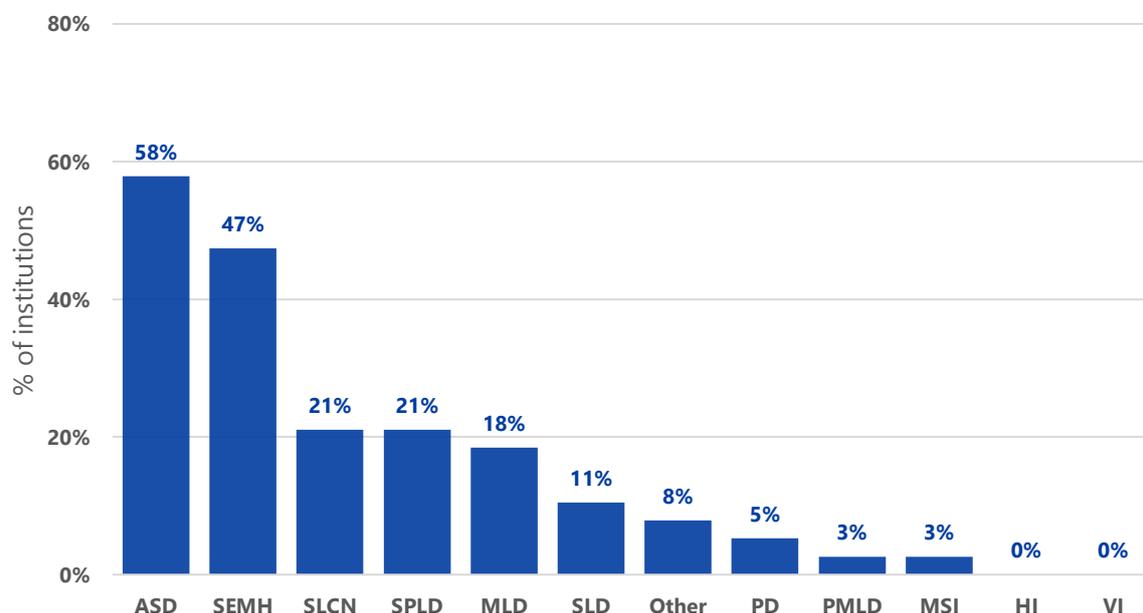


Figure 34. London's mainstream schools with a resource base or SEN unit – primary need specialism.



In contrast to state-funded specialist provision, a large proportion of independent special schools provide specialist support for pupils with SEMH (47%) compared with state-funded special schools (28%) and resource bases and SEN units (14%).

Figure 35. London's independent special schools - primary need specialism.



Another important factor for specialist provision in London is that cross-border pupil mobility is much higher in London than across England. In fact, 16% of state-funded special school pupils living in London attend schools in other local authorities, compared with 9% across England.

Existing provision gaps

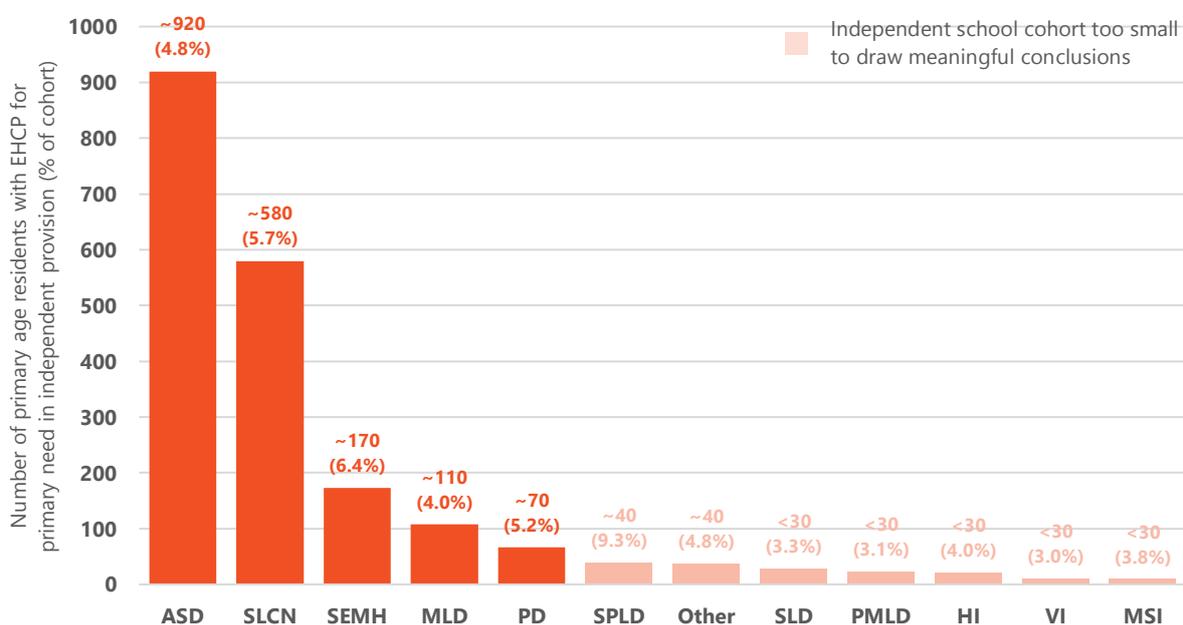
Stakeholders were clear that independent specialist provision is never the preferred commissioning option but is required when state-funded schools do not have spare capacity or cannot meet specific needs. To identify gaps in London’s specialist provision, we have therefore looked at the proportion of the EHCP cohort across each school phase and primary need group who are in independent provision. The numbers in brackets in the charts are estimates of how many places this translates to for the current cohort across London.

This analysis shows which groups in London’s EHCP cohort are currently least well provided for by state-funded provision. Overall, we have found that specialist provision gaps are largest among secondary age pupils and for those with primary needs of ASD, SLCN and SEMH.

Primary phase

Across school phases, independent provision is least commonly used for primary school age pupils with EHCPs. Excluding very small cohorts, the largest gaps in state-funded primary phase specialist provision were for the growing SLCN cohort and the large ASD cohort. Primary school age pupils with EHCPs for SEMH needs are the next most likely to be in independent provision. The relatively small cohort of young people with EHCPs for physical disabilities also see a substantial proportion (one in 20) placed in independent provision.

Figure 36. Percentage of primary age residents with an EHCP placed in independent provision

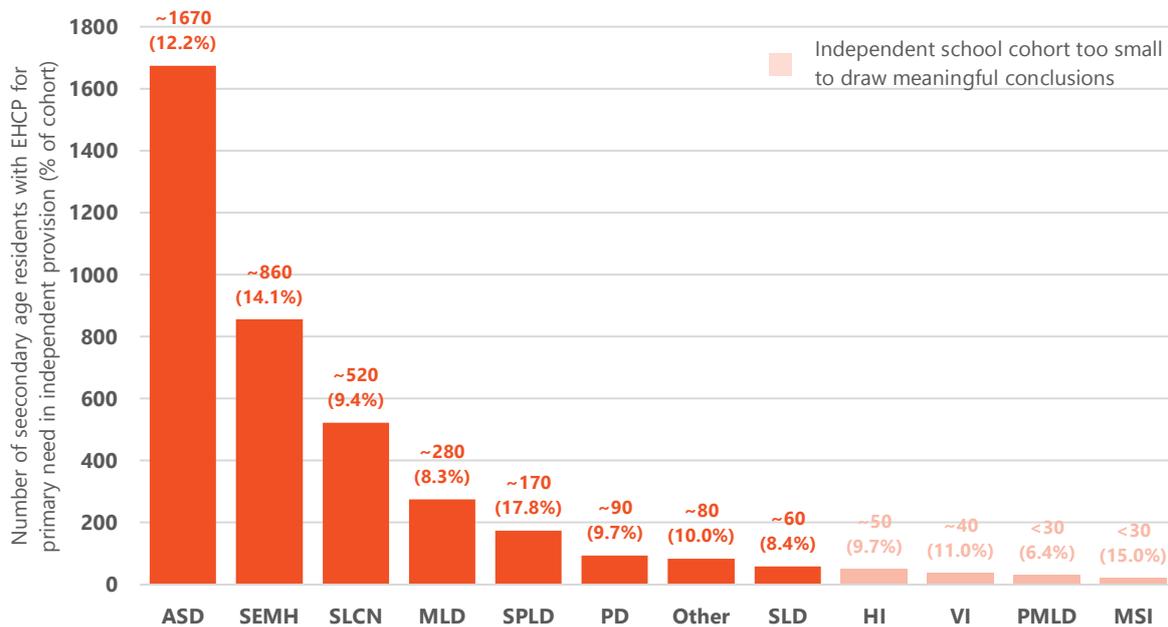


Secondary phase

At secondary, provision gaps appear much larger, with large independent school cohorts. The largest three cohorts in independent provision are the ASD, SEMH, and SLCN primary need cohorts. Concerningly, given the forecast growth of the SLCN cohort, almost one in ten secondary age pupils with an EHCP for a primary need of SLCN are placed in independent

provision. This suggests an already large provision gap that is likely to grow in the coming years.

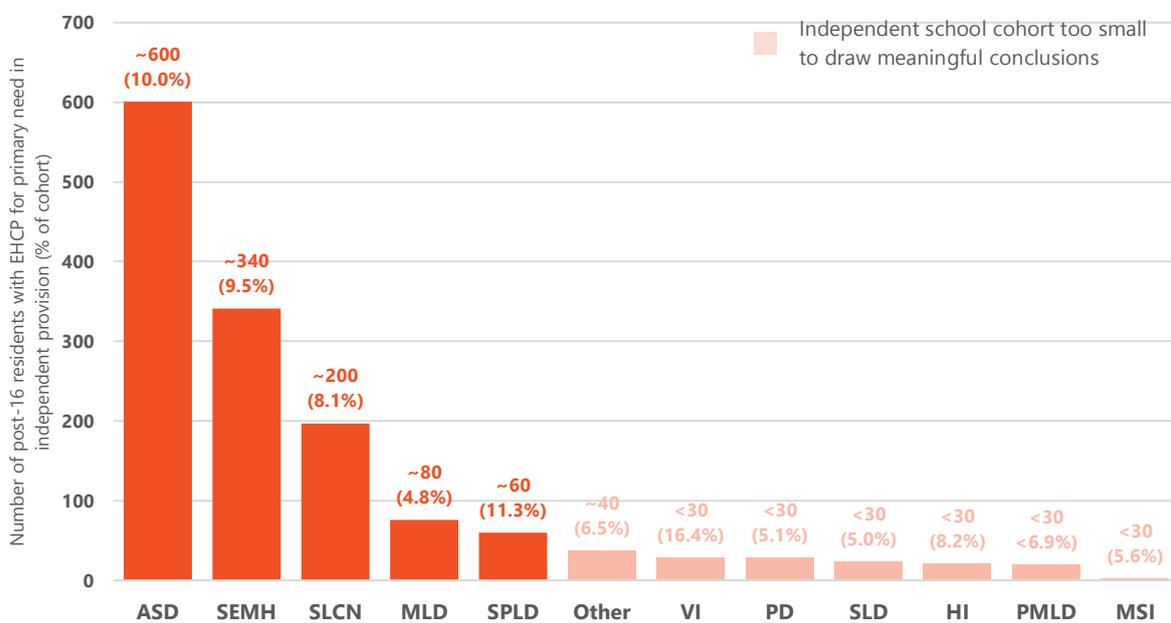
Figure 37. Percentage of secondary age residents with an EHCP placed in independent provision.



Post-16 provision

The pattern among the post-16 cohort was similar to secondary, with the largest specialist provision gaps for the ASD, SEMH, and SLCN cohorts.

Figure 38. Percentage of post-16 residents with an EHCP placed in independent provision.



Forecast growth in need

Three scenarios for London's cohort

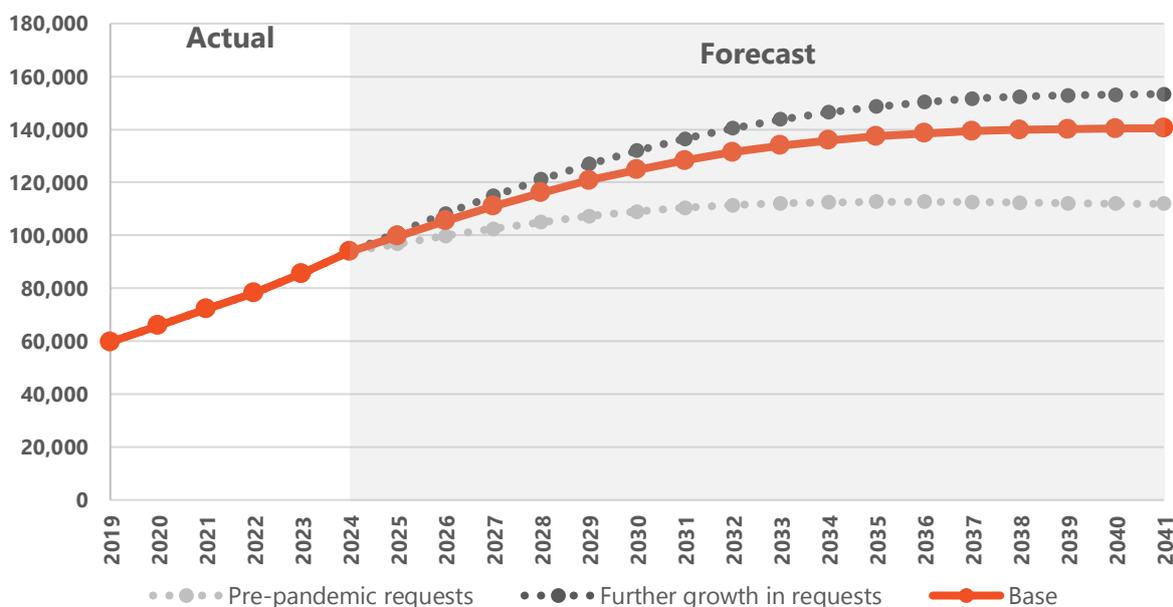
Applying Mime's EHCP cohort forecasting modelling approach to London shows that the cohort is likely to grow further over the next ten years. As shown in the chart below, we have produced three alternative scenario forecasts for London's EHCP cohort, which each forecast substantial further growth:

1. **Base model** – assumes that EHCP issuing patterns remain similar to recent years.
2. **Pre-pandemic model** – assumes a fall back towards 2019 EHCP issuing rates.
3. **Further growth model** – based on requests for EHCP assessments continuing to grow before plateauing at a higher rate.

In all three cases, we forecast substantial growth in the EHCP cohort over the next decade, with a plateauing out in the 2030s. While the drivers of the growth and plateauing are discussed in more detail below, it is important to note that the forecast growth is largely due to the existing large primary school age cohorts ageing through the system and replacing smaller cohorts as they do so. As these cohorts then age out of the EHCP system, we see a plateauing out. If the rate of EHCPs issued to young children increases again in future, for example through early identification efforts, then growth will be steeper than forecast and the plateauing later.

All three models account for the falling population of 0 to 25 year olds in London, which has a slight dampening effect on the forecast growth.

Figure 39. EHCP cohort size forecasts for London (2024-based)

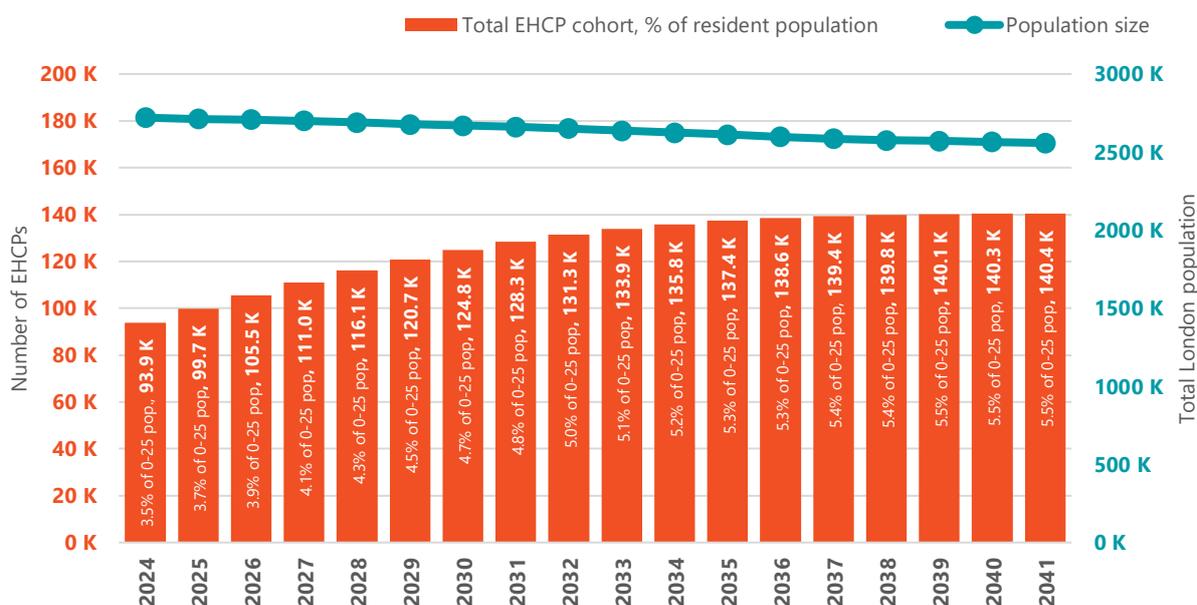


While the pre-pandemic request model results in a substantially smaller cohort in the longer term, it still forecasts significant growth over the next five years. On the other hand, if requests increase again, as they have done in recent years, then we could see rapid growth,

with the cohort reaching 140,000 as soon as 2032. While these two scenarios are certainly possible, and the trajectory the cohort takes will depend on changes in local policies and practices in London, as well as government policy, we believe that the base model is the most useful scenario for planning.

From this point on, the analysis presented is therefore from the base model only. This base model forecasts that, between 2024 and 2039, the number of young people with an EHCP in London will increase by over 45,000, rising from 3.5% to 5.5% of the total 0 to 25 year old population. This growth is despite London’s 0 to 25 year old population projected to fall year on year.

Figure 40. EHCP cohort growth vs London population change



The impact of population changes

London’s demographics are changing, with a falling population of young Londoners. This is due to both falling birth rates and migration patterns. The impact of this on school rolls is already being felt across London, with the decline in school pupils forecast to continue over the next decade. London Councils’ [research](#) showed that this impacts both inner and outer London boroughs.

The EHCP cohort forecast for London presented here accounts for this falling population by:

1. Modelling smaller new cohorts entering the cohort, due to **falling birth rates**. As shown in the charts below, falling birth rates have been seen across both inner and outer London, as well as all five of London’s sub-regions.

Figure 41. Falling birth rate – the actual and predicted number of births in London over time

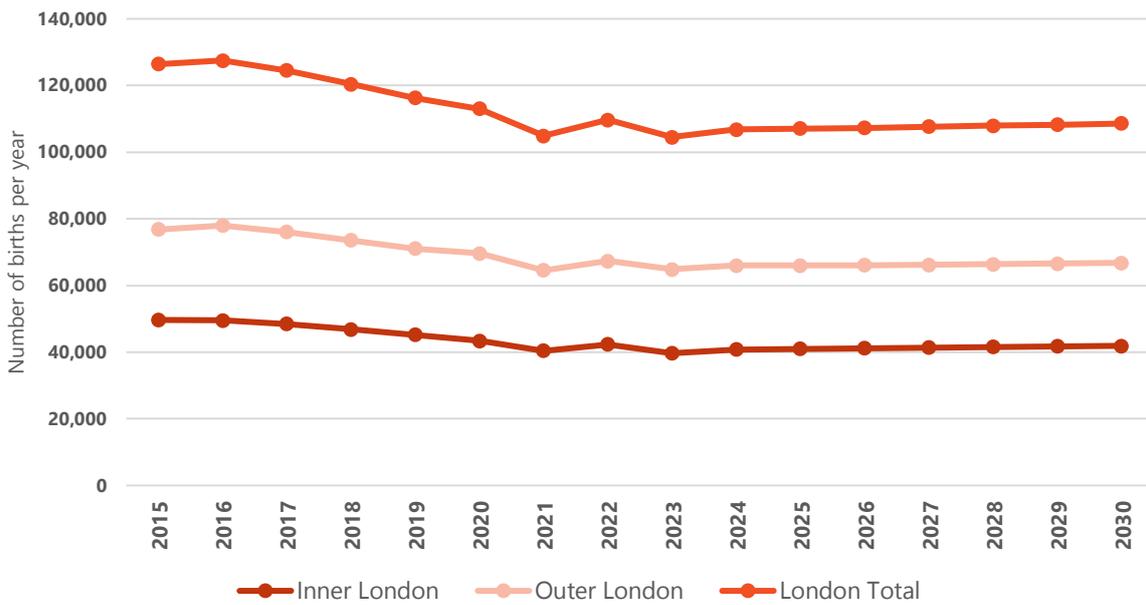
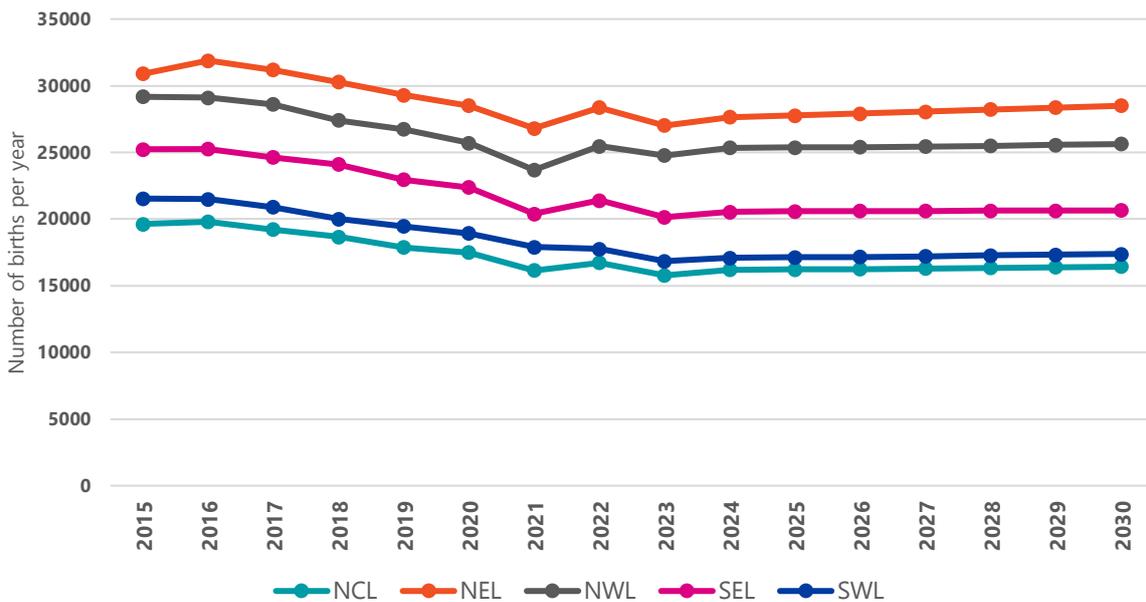


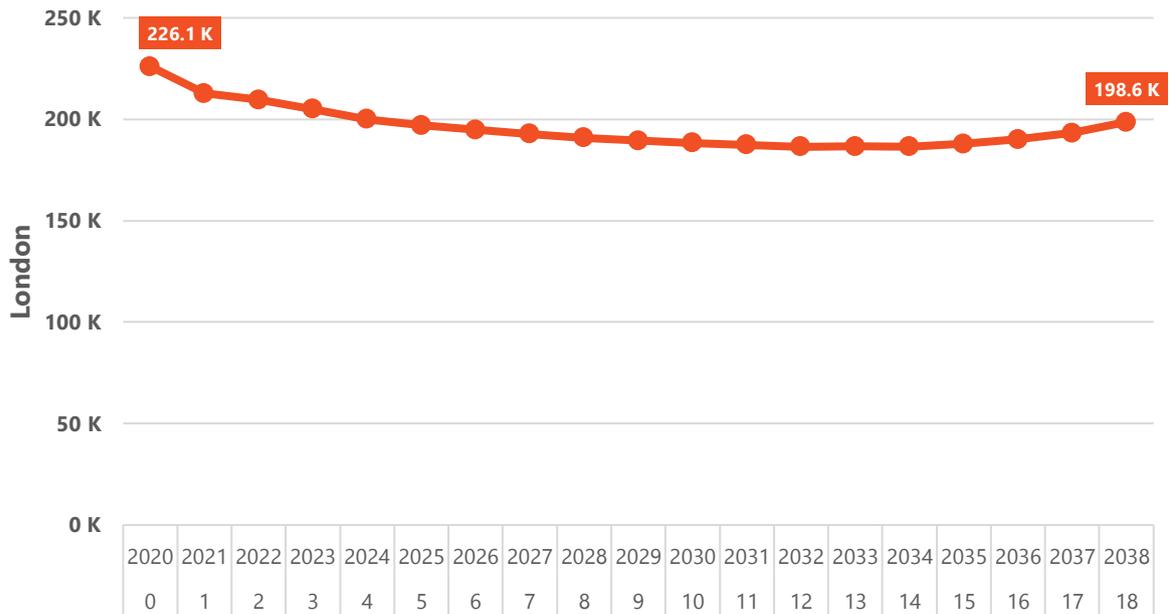
Figure 42. Falling birth rate – the actual and predicted number of births in London’s sub-regions over time



2. Modelling the **net migration out of London** of young people.

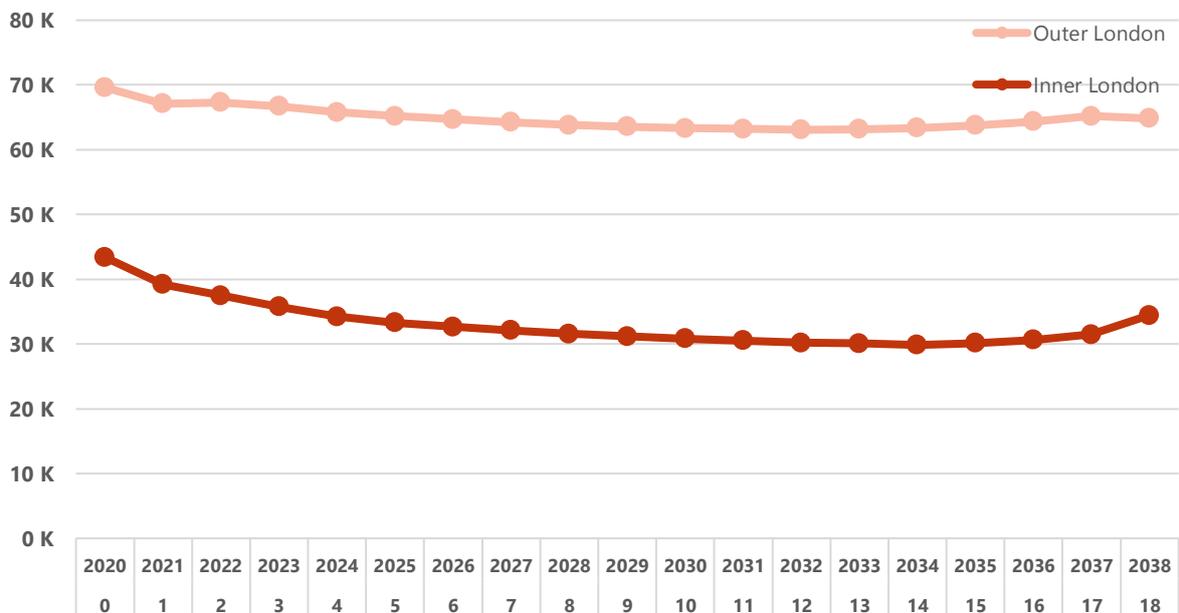
The figure below shows the impact of net migration out of London by looking at the population of the cohort of children born in 2020 in London. The chart tracks the number of this cohort in London as they age over time. It shows that there is a relatively large movement out of London in the years before primary school and then a steady continuing drop throughout the primary school age range. The population steadies at secondary age before a small uptick around 16 years old, perhaps due to some domestic and foreign immigration into London.

Figure 43. Tracking the population forecast for the cohort of children born in 2020 over time in London



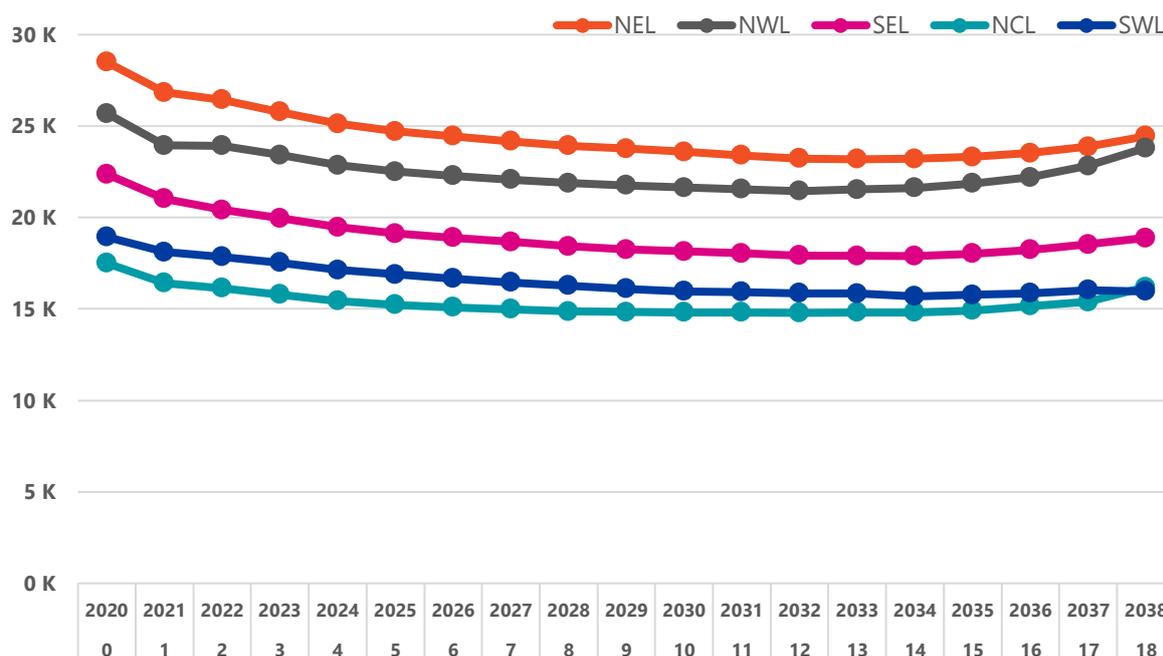
While this is a pattern seen across London, the chart below shows that the net movement out of young people is slightly more pronounced in inner London than outer London. This means that, on average, inner London local authorities should see slightly slower growth in their EHCP cohorts, and a slightly earlier plateauing of the EHCP cohort. However, even in inner London, this population effect is still much smaller than the growth in EHCPs issued.

Figure 44. Tracking the population forecast for the cohort of children born in 2020 over time in inner and outer London



As shown below, the net migration of young people out of London is seen across all five sub-regions, though is slightly steeper in some.

Figure 45. Tracking the population forecast for the cohort of children born in 2020 over time in London's sub-regions



While birth rates and migration are important factors to ensure robustness of the forecasts, the scale of the impact of the falling population in reducing the number of young people in London with EHCPs each year is far smaller than the number of young people being issued with new EHCPs. In other words, the population effect shown here merely dampens the growth in the EHCP cohort. Across London, this pattern of falling school rolls but growing EHCP cohorts is proving problematic. This results in smaller cohorts with more complex needs, putting pressure on school budgets and driving school closures.

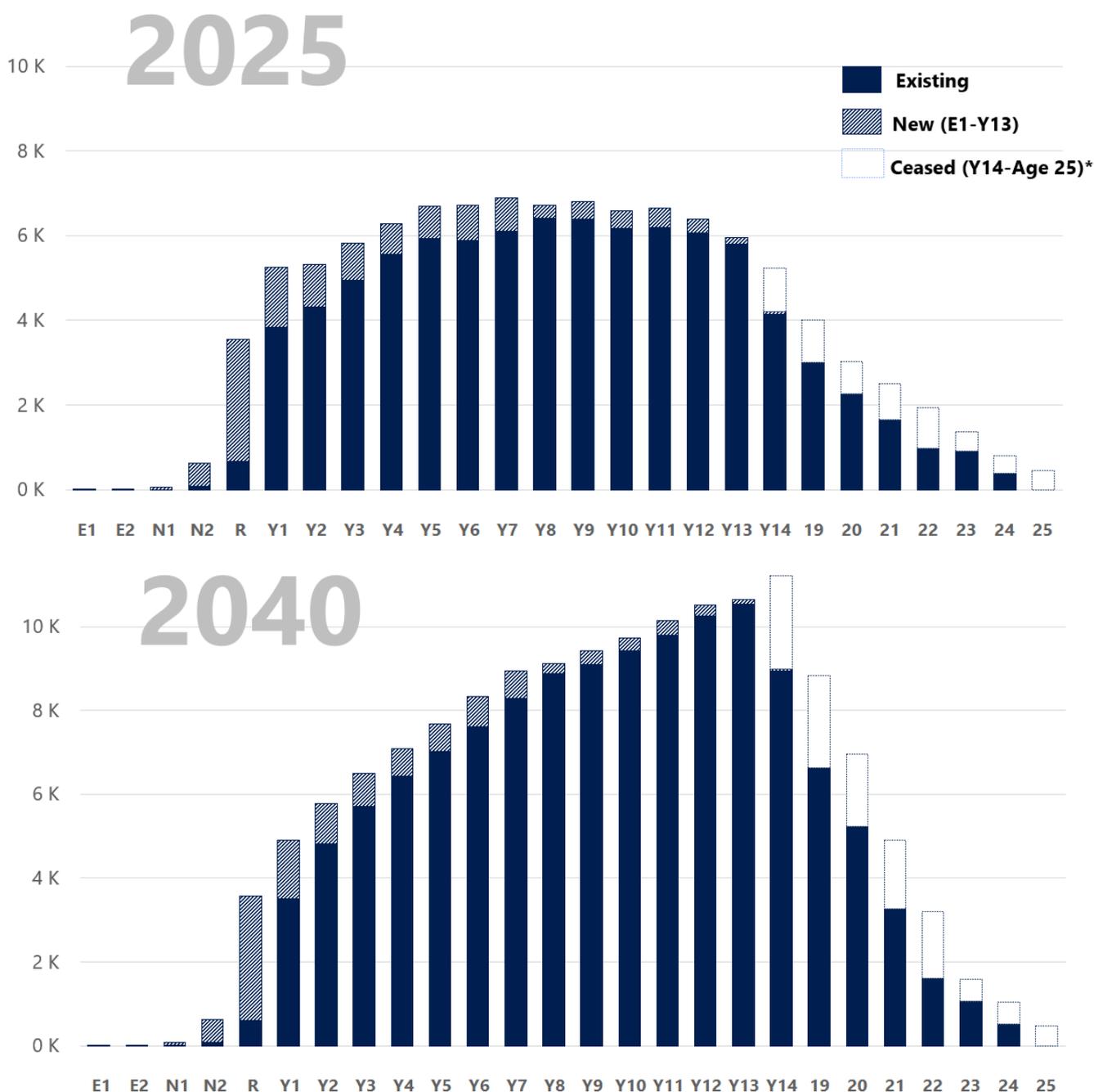
Forecast growth by school phase

To understand the forecast need for London, it is crucial to look at the cohort by age group. As we saw in the previous section, there has been a recent increase in the number of new EHCPs issued to younger, primary age pupils and London has seen a large growth in the primary age cohort with an EHCP. We can see the result of this in the shape of the 2025 EHCP cohort in the figure below. If EHCP issuing rates were consistent over time, we would expect to see the number of EHCPs increasing steadily over the school years as plans accumulate – at least until plans are ceased in large numbers post school-age. However, in the current EHCP cohort, primary school age cohorts are already almost as large as secondary school age cohorts. As these cohorts age, and new plans are issued, they are very likely to be larger than the older cohorts they are replacing. It is that pattern that is driving much of the forecast growth over the next five to ten years.

Over the coming years, we therefore expect the largest area of growth to be among secondary age and post-16 pupils as the current primary cohort ages and new EHCPs are issued. By 2040, the distribution of EHCPs is therefore likely to look quite different as issuing rates stabilise and the EHCP cohort sizes therefore increases with age.

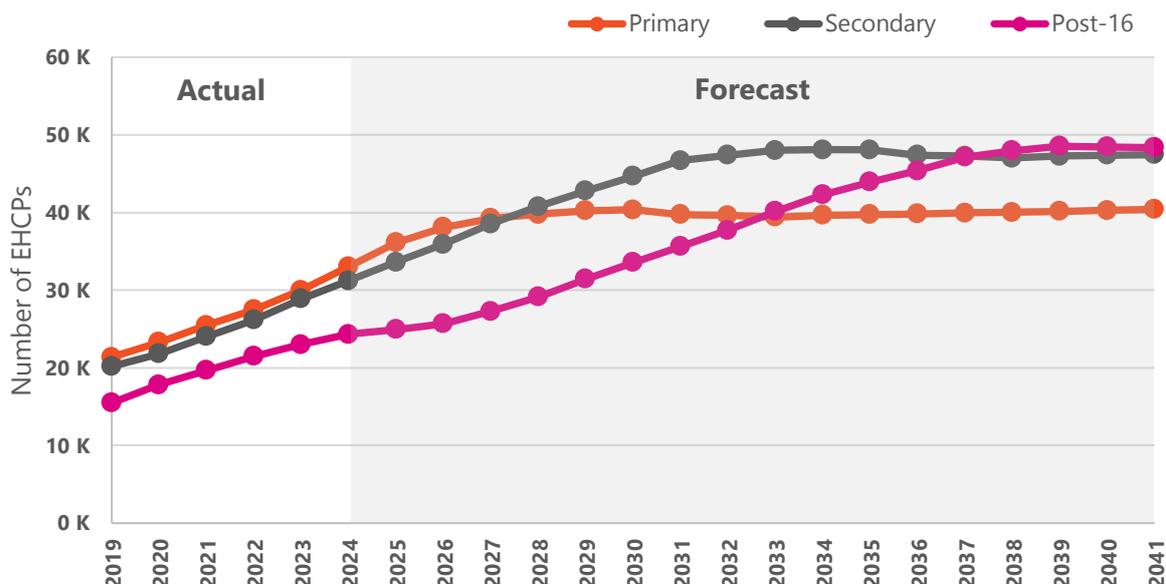
The 2040 distribution also helps to show why we forecast a plateauing in the EHCP cohort size. The current primary school age cohorts will have aged through the system and would then be being replaced by cohorts following a similar trajectory. As mentioned, this would be impacted by any substantial changes in issuing practices.

Figure 46. Snapshot of predicted cohort age distribution - 2025 versus 2040



The line chart below shows what this means in terms of school phase cohort sizes. As discussed above, the forecast projects substantial growth in secondary, and then in the post 16 age group. In contrast, the forecast shows relatively little further growth among primary-age pupils. However, it is worth noting that if there is a further increase in EHCP issuing rates, as per the model 3 above, then we will see larger increases among the primary age cohort.

Figure 47. Breakdown of EHCP growth across different education phases.



Forecast growth by need type

In line with the prevalence of SLCN needs among the new EHCP cohort in London, the cohort forecast shows an increase in the proportion of EHCPs for a primary need of SLCN, rising from 19% to 28% of the total EHCP cohort by 2040. In contrast, the proportion of EHCPs for primary needs of SEMH and ASD are both expected to fall over the long term.

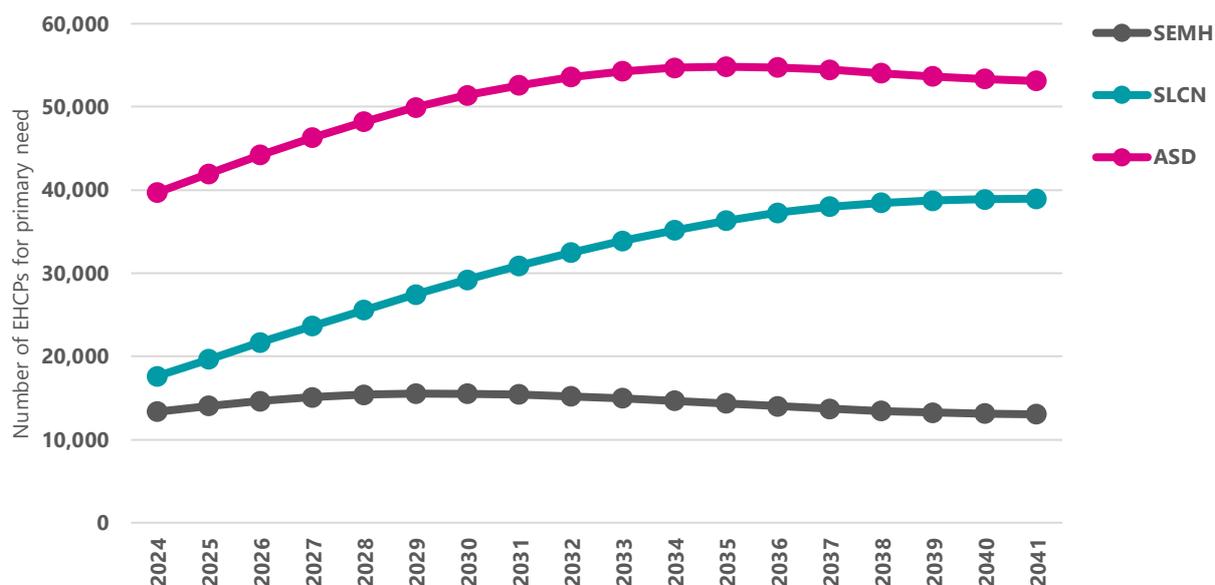
While we forecast little change in the proportion of the EHCP cohort with cognition and learning, or physical and sensory, primary needs, since the overall number of EHCPs is expected to increase, we do still expect the number of young people requiring specialist provision to support these needs to increase over time.

Table 1. Primary need breakdown over time

Year	SPLD	MLD	SLD	PMLD	SEMH	SLCN	ASD	HI	VI	MSI	PD
2024	2%	9%	3%	2%	14% (13K)	19% (18K)	42% (40K)	2%	1%	0%	3%
2031	2%	8%	2%	2%	12% (15K)	24% (31K)	41% (53K)	1%	1%	1%	4%
2040	2%	9%	2%	3%	9% (13K)	28% (39K)	38% (53K)	1%	2%	1%	4%

In fact, looking at the forecast cohort size for just the largest three primary need groups, we can see substantial growth in the number of EHCPs issued for both ASD and SLCN.

Figure 48. Changes in largest primary need groups over time



Again the picture is not the same for primary and secondary age groups. Among primary school age residents, we forecast that the number of people with EHCPs for a primary need of ASD will remain around 2025 levels, though the model does forecast continued growth in the SLCN cohort.

Among secondary-age groups, the number of young people with EHCPs for primary needs of both ASD and SLCN is forecast to continue increasing substantially in the next few years, peaking in the early 2030s. This increase among secondary-age pupils is largely due to the current primary-age cohort ageing into secondary schools. While there may be some change in individual primary needs as young people age, our previous research suggests this is not particularly common.

Forecast growth by specialist provision required

By looking at the age and primary need profile of the forecast cohort, and comparing to recent provision trends, we can explore likely provision type requirements.

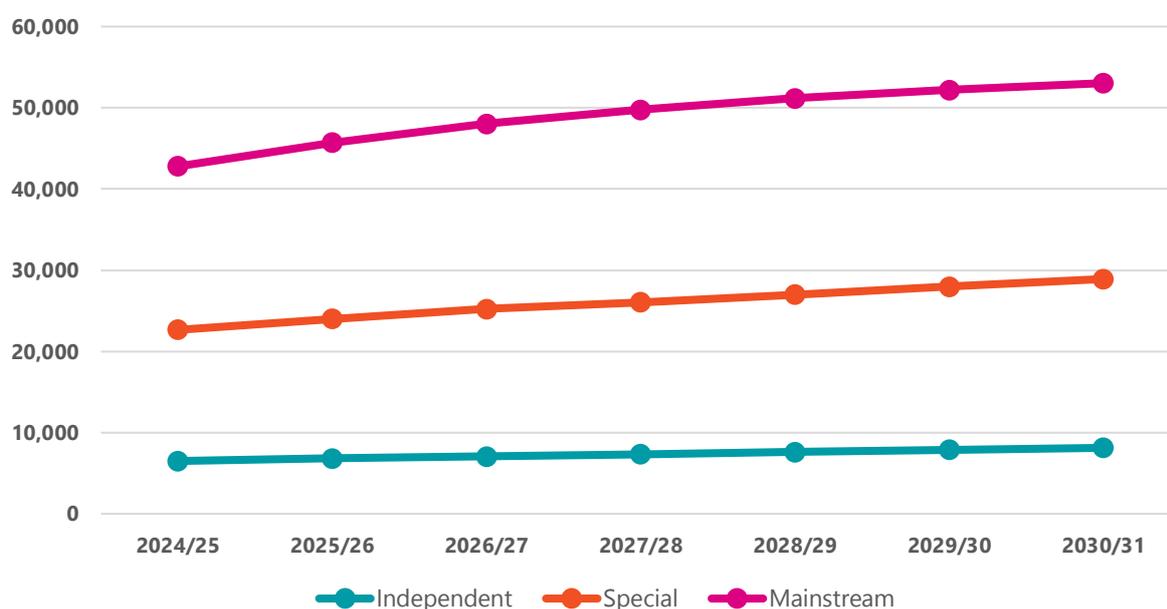
If recent placement practices continue, the largest increase in the number of placements required for young people with EHCPs over the next few years will be in mainstream schools, where our model predicts around 10,000 additional young people with EHCPs. This further highlights the need for more inclusive practice in mainstream schools.

Specialist provision in both independent and state-funded special schools, as well as resource bases and SEN units, are also all expected to see increased demand over the next six years. In particular, our model predicts a substantial increase in the number of special school placements required, rising by around 6,000 places by 2031.

If the additional places cannot be provided in state-funded special schools, or efforts to more effectively include young people with SEND in mainstream schools are insufficient,

then we would expect to see the independent placement figure increase to meet that demand.

Figure 49. Number of placements required by institution type



As we saw before, the majority of the growth over the next 5 years is expected to be among secondary-age pupils, and we expect significant growth in both the state-funded mainstream and state-funded special school placements required among this age group.

Figure 50. Number of mainstream school placements required by phase

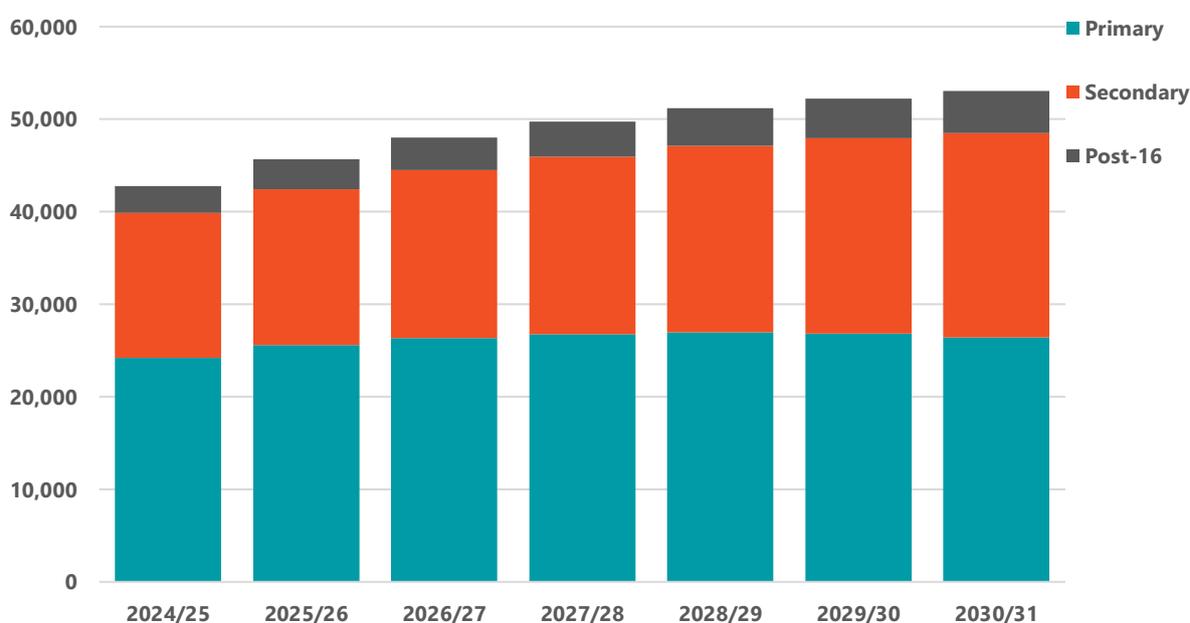
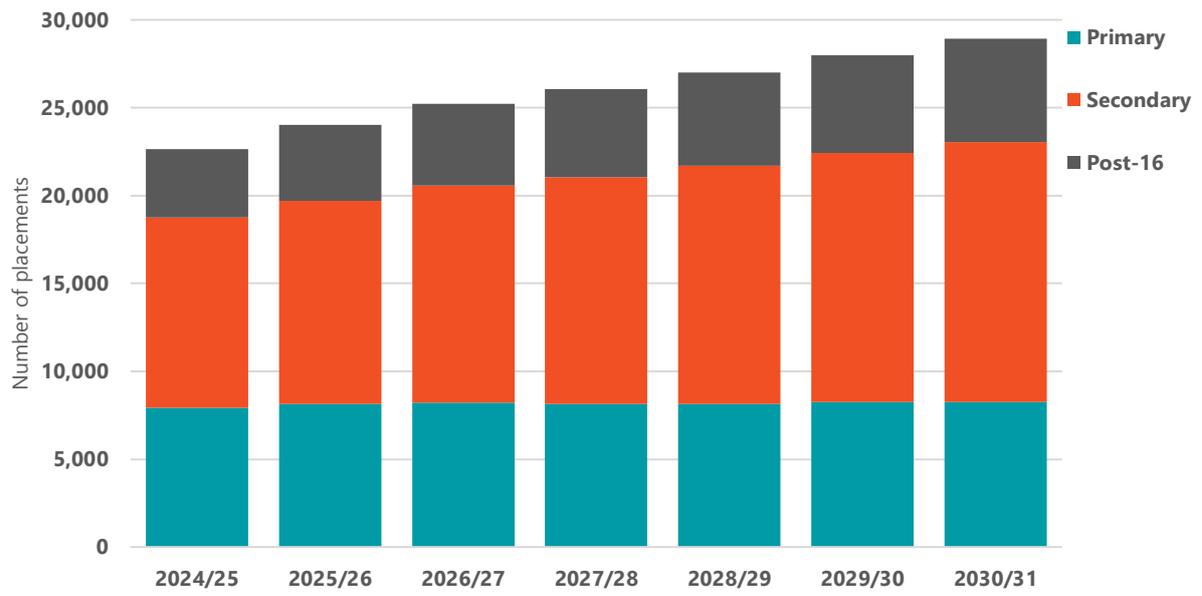


Figure 51. Number of special school placements required by phase



F. A future model for London

Future SEND commissioning model summary

Having presented a range of evidence on the current approach to SEND commissioning, the barriers faced and likely future challenges, this section outlines a future model for more effective SEND commissioning across London. This brings together evidence from our desk research, stakeholder surveys, focus groups and steering group discussions. This includes analysis of the role of collaboration across different geographical areas, including where joint commissioning may be effective. The key findings about the future model are:

- **Changing context** – There is uncertainty around the future, with ongoing changes to SEND funding and policy, as well as restructuring and budget cuts in the health sector, and changes in the care sector. These changes may present opportunities or challenges for SEND commissioning in London.
- **Stakeholders want to collaborate in many areas** – There is a strong desire to collaborate on SEND commissioning, with all survey respondents willing to join a new SEND commissioners network. This includes both informal collaboration, and formal joint commissioning. However, there is a substantial mismatch between this desire and the current levels of collaboration.
- **A clear desire for pan-London collaboration** – There is a clear desire for collaboration across London as a whole, particularly around the commissioning of independent and non-maintained special school places.
- **Role of sub-regional collaboration** – Commissioners would benefit from sub-regional collaboration on the commissioning of health services, including therapy services and the purchasing of specialist equipment.
- **Inner London collaboration** – Stakeholders in inner London told us that there is also a role for collaboration on the commissioning of both SEND transport services and post-16 college places.
- **An important role for joint commissioning** – Stakeholders want more joint commissioning, both between local authorities and their local NHS commissioners, and across groups of local authorities. Therapy services and specialist equipment, as well as placements for those with complex needs, should be jointly commissioned. Joint commissioning should mean more than just sharing the bill.
- **Achieving stronger outcomes** – Through more effective collaboration, commissioners were clear that they will be able to achieve better outcomes for young people with SEND, through quicker and more suitable commissioning, as well as improve value for money for commissioning authorities.

Contextual challenges and opportunities

It is important to acknowledge that, with changing political priorities and policies, there is a changing national context that presents both opportunities and challenges for SEND commissioning in London. In particular:

- **Uncertainty around high needs funding** – Many local authorities in London are currently relying on the 'statutory override', which allows them to maintain high needs deficits. In addition, there is uncertainty about the future of the DfE's Safety Valve and Delivering Better Value programmes, which a majority of London local authorities are involved with.
- **NHS restructure in England** – In March 2025, the Department of Health and Social Care announced a significant restructuring of the NHS in England, centring around the abolition of NHS England and large ICB budget cuts. This will have implications across London's healthcare system, with particular uncertainty about the role of London's five ICBs in SEND commissioning. In addition, the restructure is likely to consume resources and attention of key decision makers who may otherwise have been involved with SEND commissioning.
- **Regional care cooperatives** – The DfE has been working in partnership with local authorities to establish regional care cooperatives (RCC). RCCs are envisioned to ensure sufficiency of placements, negotiate with providers as 'one customer', and increase collaboration between health and justice commissioners.
- **Existing local partnerships** – There are existing regional, sub-regional and local partnerships collaborating on commissioning of other local authority services, such as the Commissioning Alliance based in West London, which focuses on social care, education and housing commissioning.

Importantly, there are also ongoing discussions around schools, SEND, and devolution policy, which are likely to have implications for SEND commissioning in London.

- **DfE and Ofsted emphasis on inclusion** – The government has made clear that it would like to see better inclusion in mainstream schools. For example, the DfE's March 2025 [guidance](#) for local authorities spending their capital allocations encourages investment in specialist provision within mainstream schools (resourced provisions or SEN units), as well as physical adaptations and improvements to better support pupils with SEND in the mainstream school environment. Similarly, the proposed new [Ofsted inspection framework](#) looks at inclusion as a distinct area, as well as a factor across all other areas of inspection. They have also committed to measures of inclusion being on the proposed new school report cards. These changes have clear implications for SEND commissioning. For example, if mainstream schools better meet the needs of young people with SEND, then there will be less need for commissioning specialist independent places.
- **Wider SEND system reform** – While the government has been clear in its intention to address the well-publicised issues in the SEND sector, there have been no formal policy announcements. Any major restructuring of the system, for example changes to the emphasis on parental choice of specialist placements or to the nature of and eligibility for EHCPs, could have significant implications for SEND commissioning.
- **Devolution policy** – The government has announced a shift to greater devolution to strategic authorities, including the GLA. While this is only at the white paper stage, the proposals include better integration with the NHS, including alignment with health administrative borders.

Future collaboration across London

Pan-London collaboration

Through the surveys and focus groups, it was clear that there is a **widespread desire for collaboration on SEND commissioning across London**. This is needed both across geographical areas, and between different organisations operating in the same geographical area, such as local authorities, NHS bodies, and parent and carer forums.

100%

Of NHS and local authority respondents would **participate in a future pan-London SEND commissioning network**

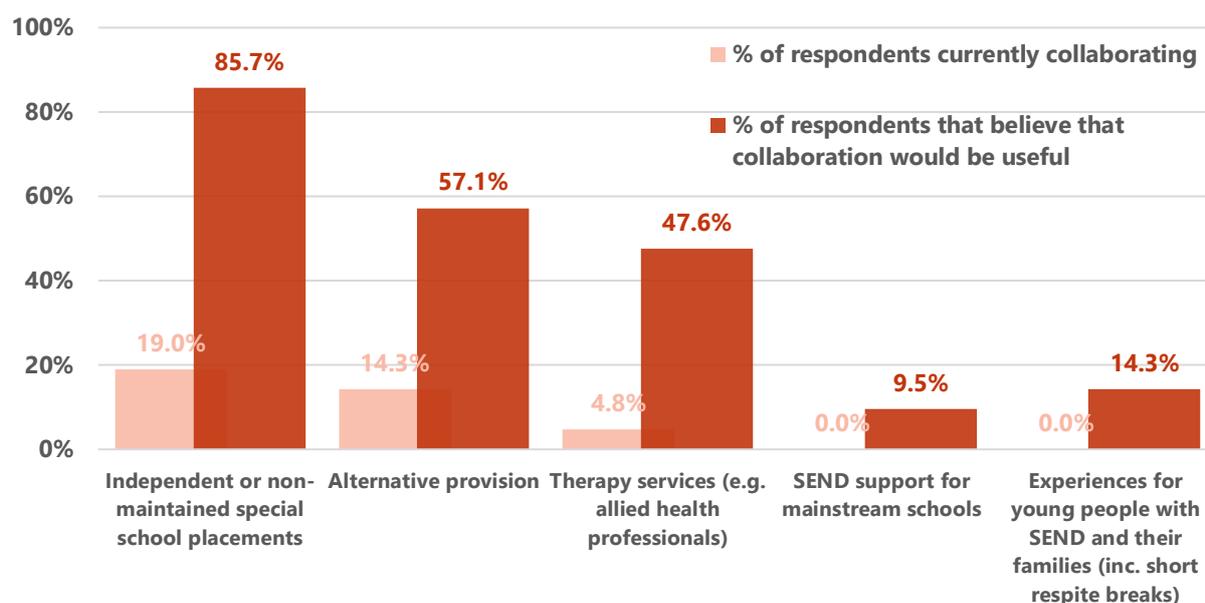
In fact, 100% of respondents to both the local authority and ICB surveys said that they, or someone else from their organisation, would like to be part of a future pan-London SEND commissioners network. There were also many comments on the usefulness of collaboration in the survey and focus groups, such as 'regular networking events would help.' There was also discussion of the importance of wider collaboration, including with families and frontline SEND professionals, in SEND commissioning, for example in helping to set the strategic direction for commissioners.

However, despite the desire for collaboration, there is a substantial mismatch between existing collaboration, and what local authority stakeholders think would be useful. There is currently little pan-London collaboration, with a large majority of respondents failing to identify any areas of collaboration across London's local authorities.

Almost all local authority respondents said they would like to be collaborating pan-London on commissioning independent or non-maintained special school places, and a majority would like to collaborate on alternative provision commissioning. Therapy services were also identified as an area for future collaboration across London.

Interestingly given the forecast growth in SEND in mainstream schools, and the government's focus on inclusion (discussed above), just one in ten respondents felt that pan-London collaboration on SEND support in mainstream schools would be useful. From our focus group discussions, it seems that this is likely driven by the SEND commissioners surveyed not feeling like commissioning for mainstream schools was a priority in their roles, with many focused on commissioning of the most specialist places for those with the most complex needs.

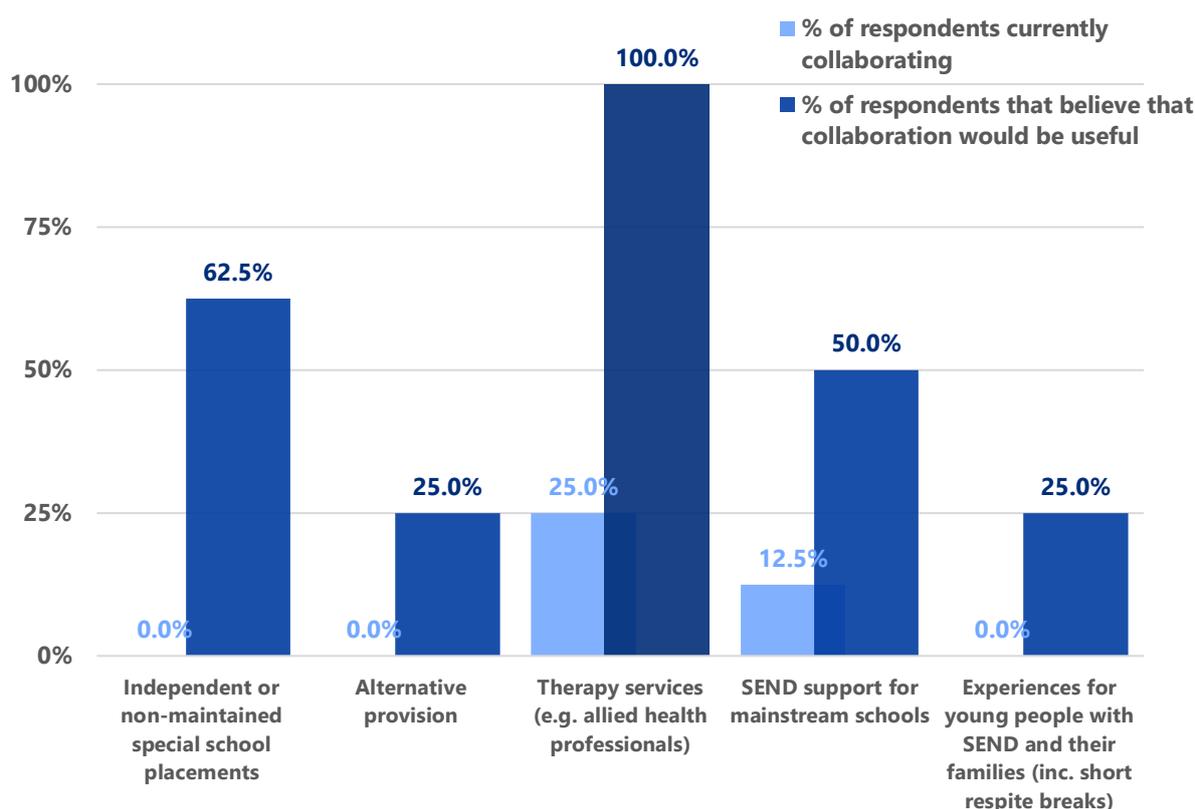
Figure 52: Local authority stakeholder views on pan-London collaboration



The feedback from ICB stakeholders was similar. While three quarters failed to identify any areas of pan-London collaboration, every respondent reported that pan-London collaboration on therapy services would be useful and a majority also identified independent and non-maintained special school places as an area for London-wide collaboration.

However, unlike the local authority respondents, half of ICB stakeholders felt that they could usefully collaborate on the commissioning of support for SEND pupils in mainstream schools. Stakeholders discussed the value of taking a pan-London approach to things like the commissioning of in-school support with speech and language.

Figure 53: ICB stakeholder views on pan-London collaboration



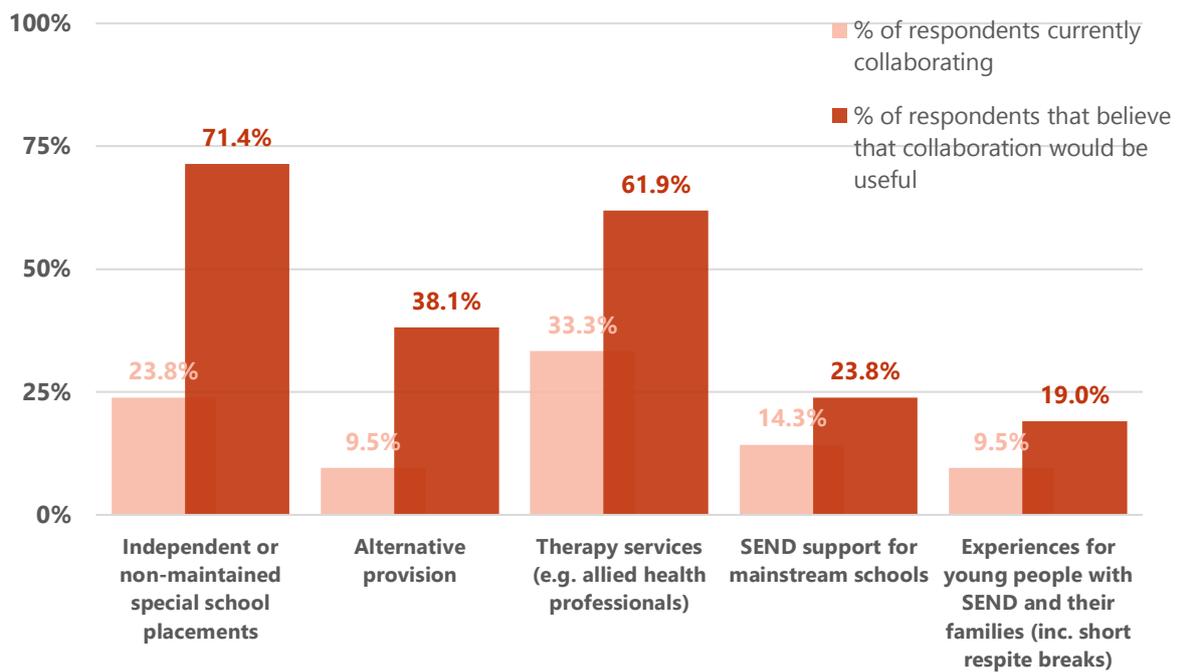
Sub-regional collaboration

While more existing collaboration was identified across individual sub-regions (see appendix 1 for definitions of sub-regions), there is still a substantial mismatch between current and desired collaboration. When asked about future collaboration in their sub-regions, local authority stakeholders were more likely to identify therapy services as an area for collaboration. This is also an area where a third of respondents reported existing collaboration, likely driven by the sub-regional role of ICBs in London.

There was a greater desire for collaboration on SEND support in mainstream schools at the sub-regional level than pan-London. This may be because commissioners feel that the number of schools to collectively support across a sub-region is more manageable than across London. In addition, many respondents identified the commissioning of post-16 college placements as an area for sub-regional collaboration.

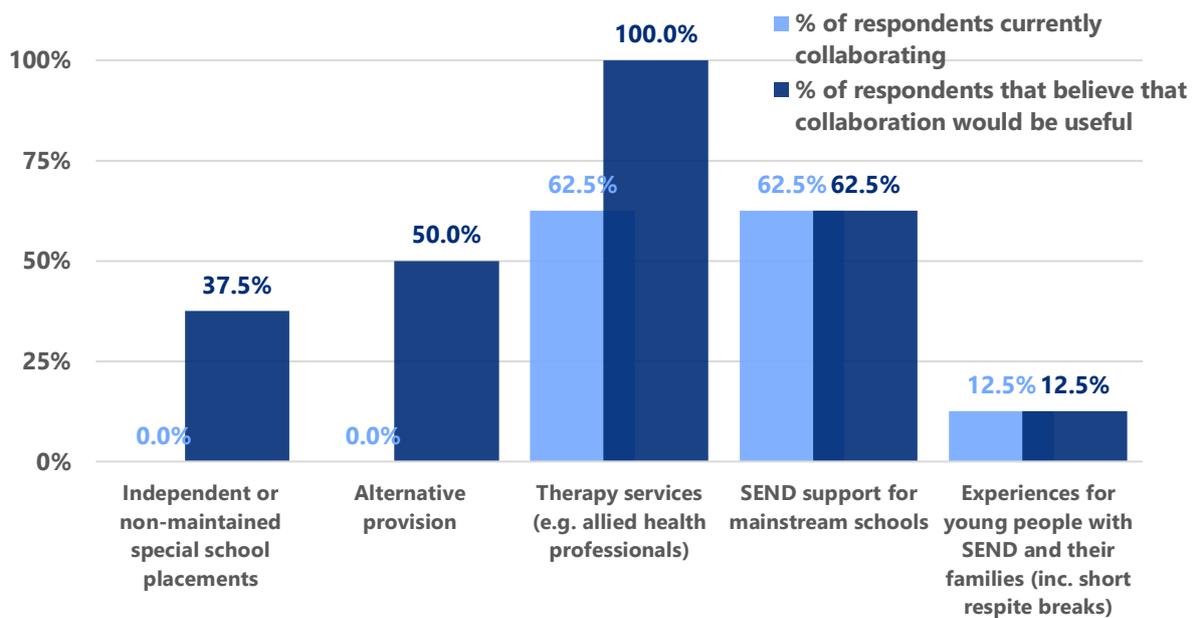
The picture varied across London's five sub-regions. Stakeholders in the North East and South East reported more existing collaboration than in other sub-regions. However, even in those sub-regions there was a desire for further collaboration.

Figure 54: Local authority stakeholder views on sub-regional collaboration



ICB respondents were also clear that therapy services should be an area for collaboration across the sub-region. However, this is not always happening at the moment. The commissioning of SEND support in mainstream schools was also identified as an area for sub-regional collaboration, though many felt that this collaboration was already ongoing. This is likely due to the fact that a single ICB covers each sub-region.

Figure 55: ICB stakeholder views on sub-regional collaboration

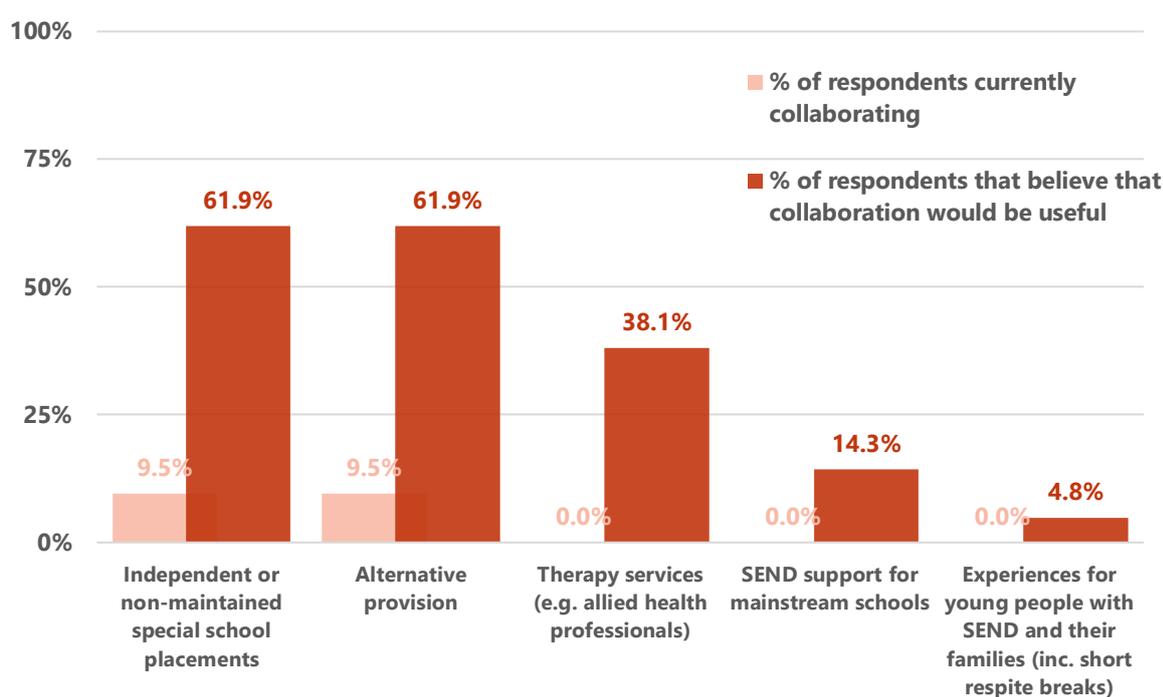


Collaboration with neighbouring local authorities

Local authority stakeholders reported less ongoing collaboration with neighbouring local authorities. In fact, 18 of the 21 local authority respondents identified no existing areas of collaboration across a small number of local authorities.

However, once again, there was a clear desire for greater collaboration. As well as independent and non-maintained special school places, alternative provision was commonly identified as an opportunity for collaboration at this level. When asked about other areas, many respondents identified SEND transport commissioning as a good opportunity for local collaboration.

Figure 56: Local authority stakeholder views on local collaboration with a small number of local authorities

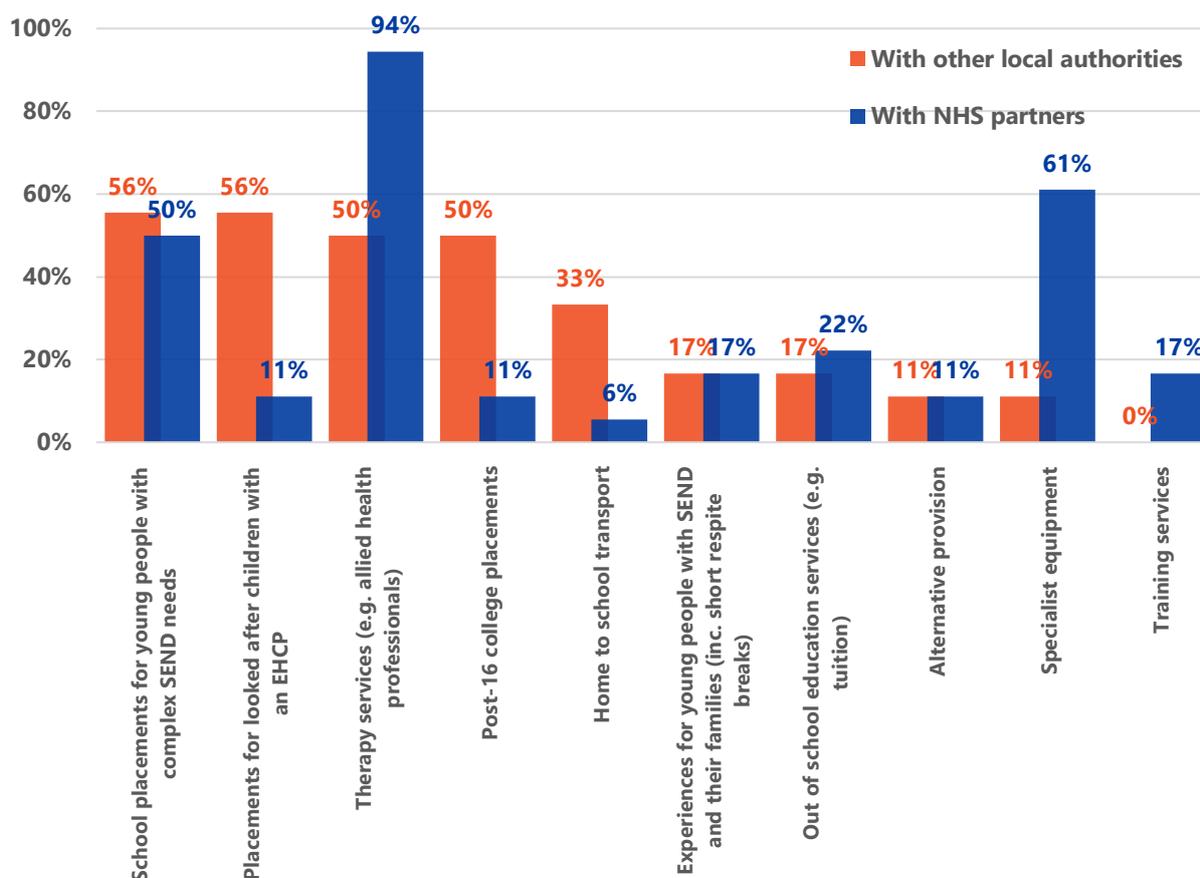


Joint commissioning priorities

There is a **widespread feeling across London’s local authorities that some SEND placements and services should be jointly commissioned.**

Local authority stakeholders were clear that therapy services, specialist equipment, and school placements for those with particularly complex needs, should be jointly commissioned with NHS partners. Many local authority stakeholders also identified opportunities for joint commissioning with other local authorities including on school and college placements, and home to school transport.

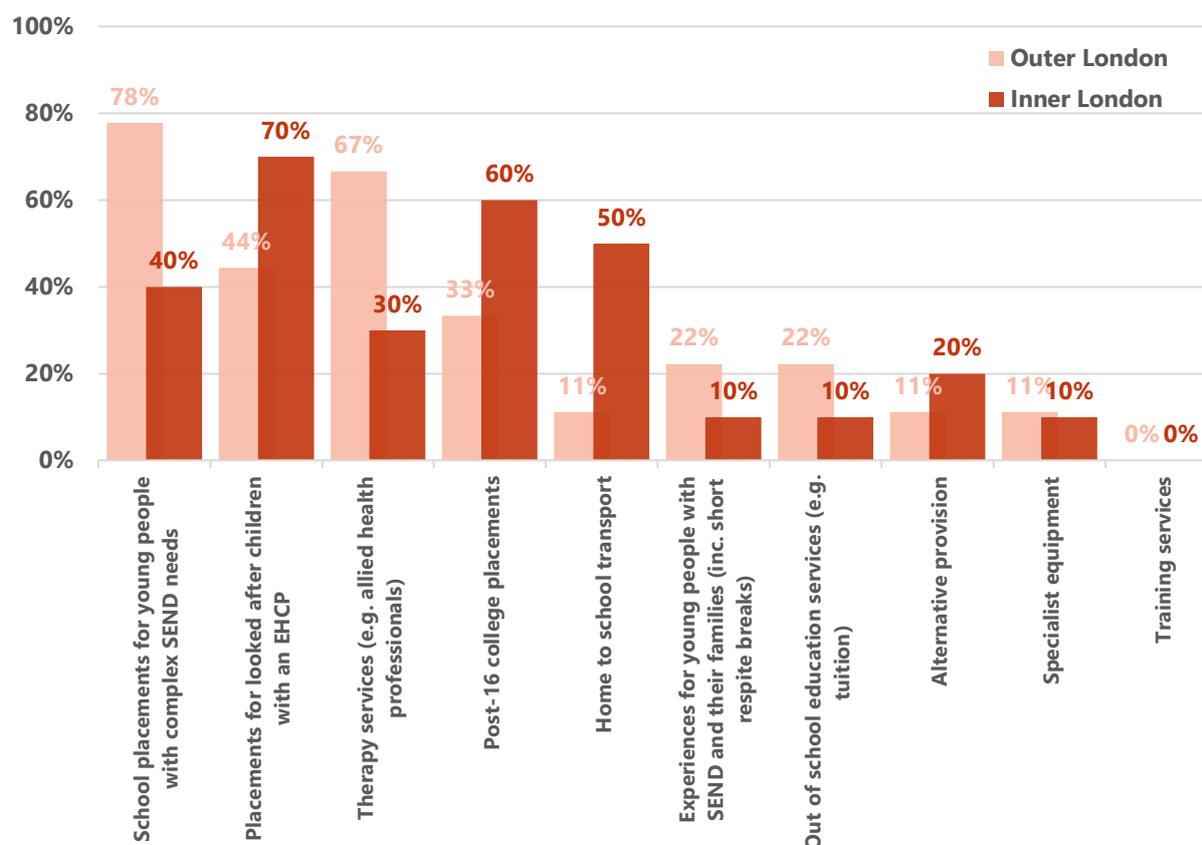
Figure 57: Local authority stakeholder views on areas that would benefit from joint commissioning



Views on joint commissioning do vary across London. In inner London, stakeholders identify school placements for looked after children with an EHCP as most benefiting from joint commissioning with other local authorities, while in outer London there is a greater emphasis on the joint commissioning of placements for those with complex SEND needs.

Inner London local authorities were also much more interested in jointly commissioning post-16 college placements and home to school transport. This likely reflects that inner London local authorities are generally smaller and see more cross-border movement.

Figure 58: Inner and outer London stakeholder views on areas that would benefit from joint commissioning

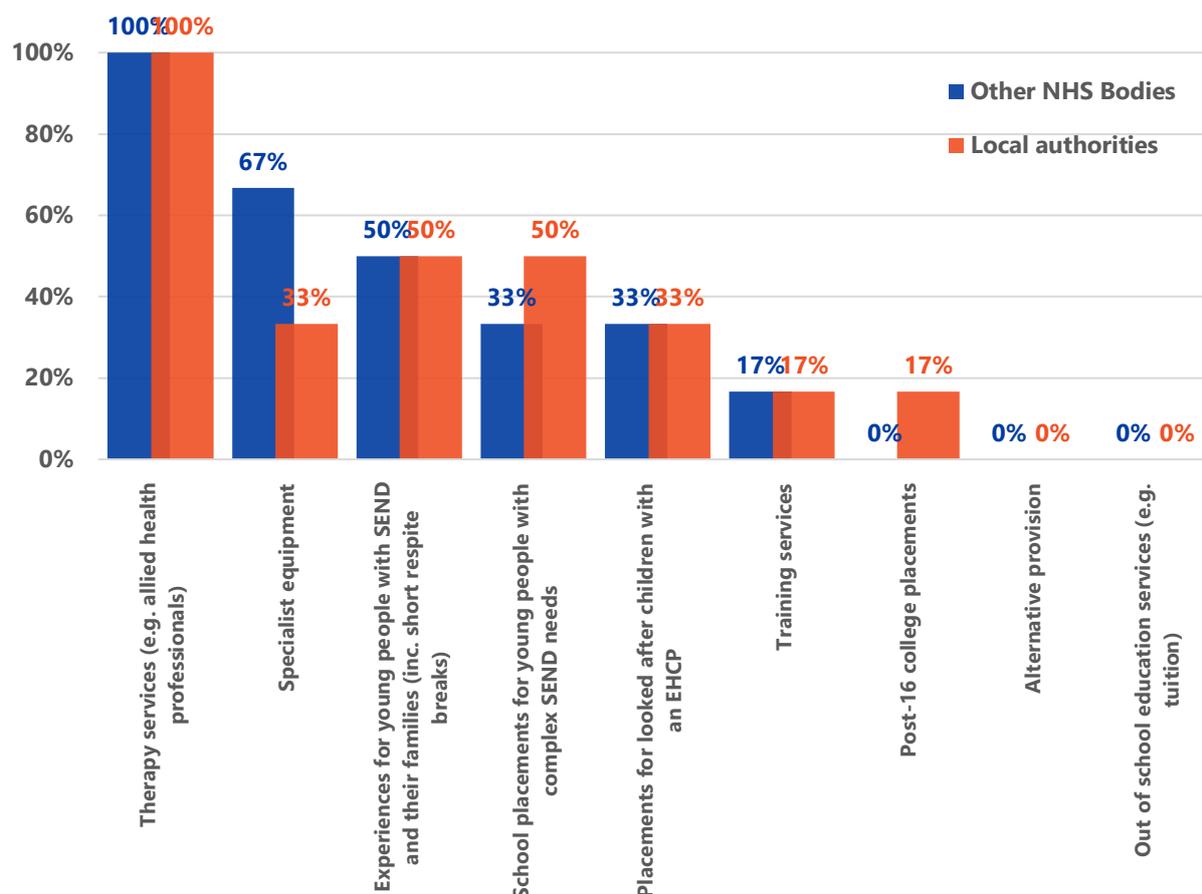


Across London’s sub-regions, priorities for joint commissioning varied. In North Central and South East London, the clear priority was school placements for those with complex SEND needs, while in North West London placements for looked after children were more commonly identified as an area that would benefit from joint commissioning. In North East London, placements for both looked after children and those with complex SEND, as well as post-16 college places were all equally identified as areas that would most benefit from joint commissioning. Responses were quite different in South West London, where therapy services and alternative provision were the most commonly identified priorities for joint commissioning.

NHS stakeholders were clear that both therapies and specialist equipment would benefit from joint commissioning. In contrast to local authority stakeholders, half of ICB survey respondents also identified respite breaks as an area for joint commissioning with other NHS bodies and local authorities.

While we heard in focus groups that school placements are often seen as the local authority’s responsibility, a large number of both ICB and local authority stakeholders, identified placements for those with complex needs as an area for joint commissioning between the NHS and local authorities.

Figure 59: ICB stakeholder views on areas that would benefit from joint commissioning



In summary, there is a **clear appetite for more collaboration and joint commissioning on SEND commissioning across London**. Based on the evidence presented in this report, we have identified the following likely focus areas by geography:

- **Pan-London priorities** – School placements for those with particularly complex needs and for looked after children.
- **Sub-regional priorities** – Therapies and other health-related services, as well as specialist equipment.
- **Inner London priorities** – Post-16 college placements and SEND transport.

There was no clear case for prioritising separate collaboration across outer London local authorities. This is likely due to the wide geographical area that these local authorities cover, and the range of local challenges they face.

Joint Commissioning Checklist, Council for Disabled Children (CDC)

The CDC have published a checklist tool to support local areas with establishing effective joint commissioning. This asks strategic leaders from across local authorities and the NHS to ensure an 'agreed vision', 'clear data' and a 'clear strategy, arrangements and governance' for the joint commissioning.

<https://councilfordisabledchildren.org.uk/resources/all-resources/filter/health/joint-commissioning-checklist>

Benefits of collaboration

Stakeholders identified four major benefits of working more collaboratively:

Improved outcomes for young people with SEND

By enabling more joined-up holistic support across education, health, and care provision, joint commissioning can improve outcomes for young people with SEND. This should ensure that support across all three domains (education, health and care) is complementary, and all directed at supporting the young person to achieve the outcomes identified in their EHCP.

By bringing together a wider range of experts, pooling resources and sharing data, commissioners are more likely to identify the best placement or service for the young person. Additionally, more joined up working can ensure that interventions are put in place earlier, preventing escalation of need and associated trauma.

Finally, collaboration can drive innovation, and the sharing of ideas can lead to the new best practice emerging. This ensures that commissioners across London can learn from successes elsewhere and implement them in their own work.

Ensuring value for money

Particularly for low incidence and high-cost requirements, joint commissioning creates economies of scale and supports more effective negotiations. For example, partnerships of buyers can better negotiate with suppliers, and negotiations can be handled collectively, reducing duplication of effort. Joint commissioning can also help ensure consistency in pricing across London, which supports SEND commissioners to better plan their resources.

Consistency for families

In London there is a large amount of movement across administrative borders. Joint commissioning of SEND services can help to ensure consistency in approaches, avoiding confusion and delays. Better collaboration also ensures clarity around accountability, with families having clarity on who is responsible for supporting them or can be more quickly referred onto the right people.

Sharing expertise

Joint commissioning can create opportunities to share expertise, such as legal, procurement and finance resources, as well as access to expertise that would otherwise not be available to SEND commissioners. Additionally, monitoring and evaluation efforts can be combined, increasing their coverage and reducing duplication. This can help to ensure that SEND commissioning is efficient, ensures value for money, and that providers are appropriately held to account for the outcomes they achieve for young people with SEND.

G. Recommendations

Our recommendations detail how London can move from the current position to the desired future model, with much greater cross-organisational collaboration across London, in sub-regions and between neighbouring local authorities. The recommendations are split into the following three themes:

1. Priorities setting, buy-in and peer-support

2. Data sharing

3. Joint commissioning

We have also developed an implementation roadmap, which sets out the interdependencies between the recommendations and the delivery timelines.

Below, we present 17 recommendations across these three themes, summarising the findings behind each, the lead for delivery, and the expected outcomes to be achieved.

Each recommendation is assigned to be implemented by one of the following stakeholders:

- **LIIA** – These actions should be taken forward by those leading LIIA's SEND commissioning workstream.
- **Pan-London SEND commissioning hub** – A group of SEND commissioners with the experience and capacity to implement these actions, likely hosted within LIIA, with LIIA staff providing secretarial support.
- **Pan-London SEND commissioners network** – An informal network of all SEND commissioners across London.
- **Sub-regional leads** – Lead local authorities or existing sub-regional organisations for each of the five London sub-regions. Each lead should have a named senior leader with capacity to implement these recommendations
- **SEND commissioning data working group** – A group of local authorities and ICB stakeholders with experience and expertise in data sharing for SEND commissioning.
- **Inner London representatives from pan-London SEND commissioning hub** – A sub-group of the SEND commissioning hub comprised of members from inner London local authorities.

1. Priorities setting, buy-in and peer-support

As identified above, a lack of a strategic approach to SEND commissioning prevents effective commissioning to meet the needs of young people with SEND and ensure cost effectiveness. These recommendations set out how pan-London and sub-regional priorities should be agreed, and how key information should be shared across commissioners.

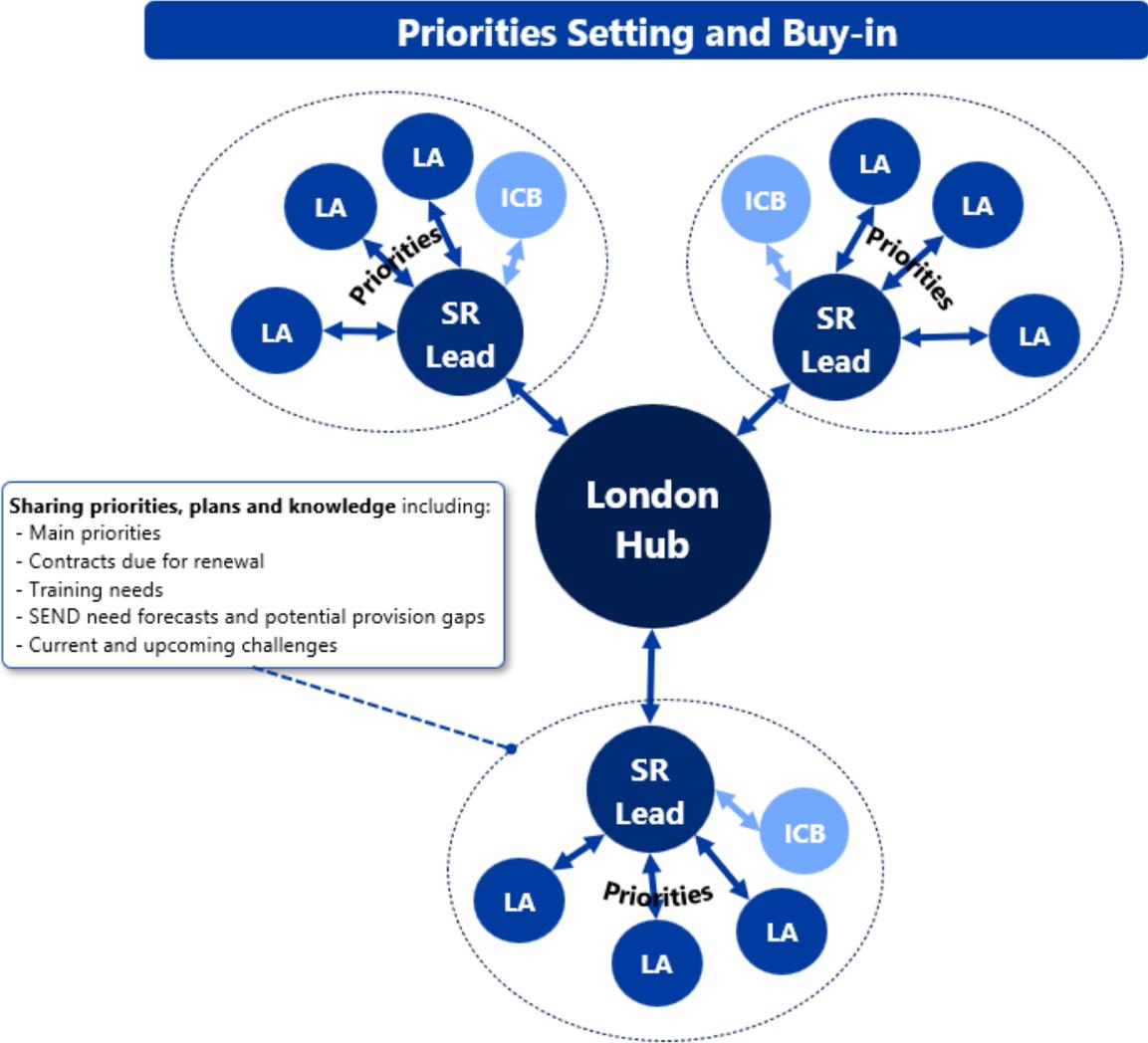
What we found	Recommendation	Lead	Outcome
<p>Local authorities and ICBS want much more collaboration at the regional level across a range of commissioning areas and all respondents indicated a willingness to be part of a pan-London SEND commissioners network.</p> <p>However, stakeholders face a range of barriers to collaboration, including resource constraints, process alignment, a lack of a common approach, and different priorities.</p>	<p>1. LIIA should secure resource for, and establish, a pan-London SEND commissioning hub to lead collaboration across London, likely focusing on priorities around the commissioning of independent or non-maintained school placement for those with particularly complex needs. The hub will ensure alignment across organisations and help to agree priorities for collaboration.</p> <p>This hub is likely to be hosted within LIIA but other options should be explored. Options for delegating some decision making responsibility to the hub should also be explored</p>	LIIA	Clear direction and vehicle for pan-London collaboration in priority areas, creating opportunities for more cost-effective and impactful SEND commissioning
	<p>2. LIIA should establish a pan-London SEND commissioners network to facilitate the sharing of useful information, encourage relationship building, and promote a culture of collaboration on SEND commissioning.</p> <p>The network should have simple and accessible communication channels for stakeholders to ask questions or share learnings.</p>	Pan-London SEND commissioning hub	Useful information is shared between SEND commissioners across London and supportive relationships are developed, empowering SEND commissioners to be more effective

What we found	Recommendation	Lead	Outcome
<p>There is a lack of data sharing governance and a lack of confidence in what processes to follow. This has led to insufficient data sharing across London.</p> <p>In particular, stakeholders reported issues with the sharing of health-related personal data.</p>	<p>3. The pan-London SEND commissioning hub should establish pan-London data sharing governance.</p> <p>This should provide the basis for those setting up sub-regional and other local data sharing, including to facilitate person level data sharing.</p> <p>This should include an approach to sharing health-related data, and finance data, for example on the costs of independent placements.</p>	<p>Pan-London SEND commissioning hub</p>	<p>Local authorities and ICBs empowered to share data, reducing delays which impact cost-effectiveness and negatively affect young people with SEND</p>
<p>There are examples of best practice that could be adopted more widely but are not routinely shared.</p>	<p>4. The pan-London SEND commissioners network should collate and share examples of best practice.</p> <p>This should be done through accessible informal discussion forums, such as a Microsoft Team with channels for different topics.</p>	<p>Pan-London SEND commissioners network</p>	<p>SEND commissioners across London learn from best practice and support networks, implementing changes locally to improve cost-effectiveness or deliver better outcomes for young people with SEND</p>
<p>Many SEND commissioners benefit from informal and formal networks, but knowledge and use of these networks is patchy.</p>	<p>5. The pan-London SEND commissioners network should collate and share a directory of informal and formal support networks.</p>	<p>Pan-London SEND commissioners network</p>	

What we found	Recommendation	Lead	Outcome
<p>Local authorities and ICBs want much more collaboration at the sub-regional level, particularly around the commissioning of health-related services.</p>	<p>6. LIIA should identify sub-regional lead organisations.</p> <p>These could either be lead local authorities or existing sub-regional partnerships (e.g. the Commissioning Alliance) depending on the context in each sub-region. The lead organisations must have identified a named senior leader with adequate time and resourcing to implement these recommendations</p>	LIIA	<p>Clear direction and buy-in for sub-regional collaboration in priority areas. This should reduce duplication, reduce reliance on independent school placements, and improve outcomes for young people with SEND</p>
	<p>7. Sub-regional leads should establish the sub-regional context and agree priorities.</p> <p>These priorities should be driven by evidence from the skills and expertise audit, the need forecast, and the provision gaps analysis, as well as local knowledge on current challenges and context around things like existing contracts.</p> <p>These priorities should be updated as and when newer information becomes available, for example with the data from each annual SCAP return. The priorities should be shared with the pan-London hub and distributed across London so that sub-regional leads can see who else is working on similar priorities.</p>	Sub-regional leads	

What we found	Recommendation	Lead	Outcome
<p>There is a lack of data sharing within sub-regions, particularly between local authorities and health partners. An important barrier is a lack of understanding and resources around data sharing governance.</p>	<p>8. Sub-regional leads should establish sub-regional data sharing arrangements, building on the pan-London governance established.</p> <p>This should cover two-way person-level data sharing between the local authorities and the ICB.</p> <p>As well as data sharing agreements, this should include guidance on how and when to pseudo-anonymise and how to minimise the data you are sharing.</p>	<p>Sub-regional leads</p>	<p>Data more easily and more quickly shared between sub-regional partners involved in SEND commissioning, reducing delays which impact cost-effectiveness and negatively affect young people with SEND</p>
<p>There are common skills and expertise gaps identified by SEND commissioners across London</p>	<p>9. Sub-regional leads should establish joint training requirements to address skills gaps. This should be driven by sub-regional priorities, but should be informed by the skills audit in this research</p>	<p>Sub-regional leads</p>	<p>Skills gaps filled and relationships between SEND commissioners across London's sub-regions established, resulting in more efficient SEND commissioning</p>

The diagram below sets out the high-level logic that would be established through the implementation of the recommendations above.



2. Data sharing

Data sharing was a commonly cited barrier to effective SEND commissioning. The specific issues around the use of data are explored in section D above. These recommendations set out how London’s local authorities and ICBs can move to the “to-be” model for the use of data in SEND commissioning outline above.

What we found	Recommendation	Lead	Outcome
Despite a widespread desire for more effective data sharing, it remains limited, particularly between local authorities and health partners.	10. LIIA should establish a SEND commissioning data working group with representatives from local authorities and ICBs.	LIIA	More effective data sharing between education, care and health partners involved in SEND commissioning. In turn, more appropriate provision commissioned for young people with SEND and better outcomes
	11. The SEND commissioning data working group should review and publish the proposed “to-be” approach to the use of data in SEND commissioning.	SEND commissioning data working group	
	12. The SEND commissioning data working group should lead the implementation of the “to-be” approach. This should include supporting the sub-regional leads to establish local authority/ICB data sharing agreements across London		
Data on independent and non-maintained special schools is limited and difficult to access.	13. LIIA should take on ownership of the new independent and non-maintained special school data collection platform.	LIIA	SEND commissioners can more easily access key data on independent or non-maintained schools before commissioning places. This

What we found	Recommendation	Lead	Outcome
<p>In particular, stakeholders would like access to better information on placement costs, the specific needs supported, and the outcomes achieved by pupils with SEND.</p>	<p>LIIA should test the tool with a small number of local authorities to ensure the data collection is realistic and not overly burdensome, while also providing useful strategic data to support placement decisions and fee negotiations. LIIA should then refine the tool based on this feedback and roll out across London.</p> <p>Once rolled out, the tool could include sharing data on the costs of independent and non-maintained placements by provider and primary need, the outcomes achieved by pupils with SEND, and intelligence on suppliers' approach to fee negotiations.</p> <p>In the longer-term, LIIA could explore the possibility of improving this data collection by gathering a pan-London person-level dataset of those in independent or non-maintained provision. This could come from combining AP census data from all London local authorities and would build on similar work with SEN2 returns. LIIA may be able to take learnings from that work and repurpose documentation like data sharing agreements.</p>		<p>strengthens commissioners' ability to ensure cost-effectiveness and good outcomes for young people with SEND</p>
<p>There is no accessible, central place to find and share information on specialist providers across London.</p>	<p>14. LIIA should take on ownership of the new online specialist placement identification tool.</p>	<p>LIIA</p>	<p>SEND commissioners can more easily identify suitable specialist provision, ensuring it</p>

What we found	Recommendation	Lead	Outcome
	<p>This will combine several data sources into a single interactive, online map showing data from a single, central database.</p> <p>This will include key information for commissioners and will be accessible to all London SEND commissioners.</p> <p>This central database can then be updated as more data is made available, for example if a SEND commissioner reports that a school now provides for a different SEND need.</p>		will provide the best outcomes for young people with SEND

3. Joint commissioning

We are recommending a staged approach to moving forward with joint commissioning initiatives. At each geographical level, we suggest:

- 1. Agreeing priorities** for joint commissioning among a group of willing partners.
- 2. Explore the business case** for developing a specific joint commissioning pilot that is focused on addressing one of the agreed priorities.
- 3. Developing the full pilot proposal** including detail on the role different organisations and people will play and how both financial costs and work commitment will be split. If the pilot is focused on independent and non-maintained school placements, this proposal development should also consider the feasibility of agreeing benchmarks for costs by need type.
- 4. Launching the pilot** with established metrics for gauging its success.
- 5. Reviewing successes and learnings** from the pilot before rolling out more widely if appropriate.

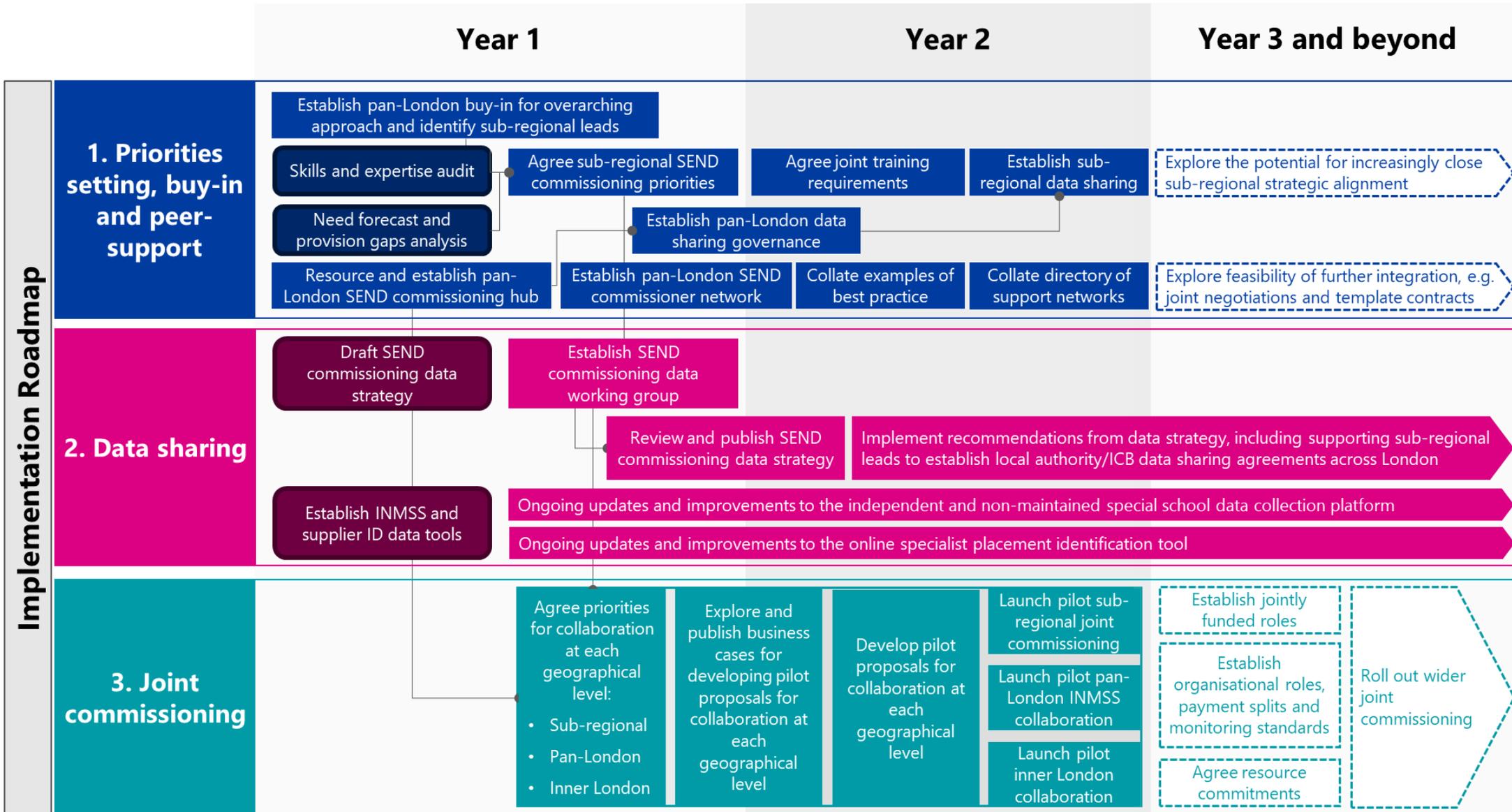
Given the different priorities, resources and existing contractual obligations across London's local authorities and ICBs, it may not be possible or feasible to include every local authority and ICB in each geographical area's pilot. Collaboration should therefore proceed with those organisations who are in a position to participate, with others joining when feasible. In addition, different groups may well be in a position to move forward with pilot joint commissioning projects more quickly than others. Each group should progress as quickly as feasible.

What we found	Recommendation*	Lead	Outcome
<p>Joint commissioning at the sub-regional level, particularly of health-related products and services, would be beneficial but there are barriers to its implementation.</p>	<p>15. Sub-regional leads should outline a business case and then develop and pilot a joint commissioning project.</p> <p>The business cases should explore the costs and benefits of different options for each sub-region, taking into account their respective priorities, to ensure the pilot is well-focused.</p> <p>The scope of the pilot will depend on this work but is likely to be around therapy services or specialist equipment. Collaboration across London’s sub-regions is at different stages of maturity so the timelines for this will vary.</p>	<p>Sub-regional leads</p>	<p>Agreement on the most beneficial areas for regional/sub-regional/inner London joint commissioning, and clarity on the best approach. This enables local authorities and ICBs to benefit from economies of scale and collective negotiation. This also reduces the barriers to further joint commissioning.</p>
<p>There is a large gap between the current level of pan-London collaboration and the level of collaboration commissioners would like, particularly around the commissioning of placements for those with complex needs and looked after children with SEND.</p>	<p>16. The pan-London SEND commissioning hub should outline a business case and then develop and pilot pan-London collaboration on independent and non-maintained placement commissioning.</p> <p>The business case should explore the costs and benefits of different options to ensure the pilot is well-focused, and learn from previous similar work (including the Commissioning Alliance’s work).</p> <p>The scope of the pilot will be determined by this work, but is likely to focus on the commissioning of places for those with the most complex needs and looked after children with SEND</p>	<p>Pan-London SEND commissioning hub</p>	

What we found	Recommendation*	Lead	Outcome
<p>Inner London local authorities would like to collaborate more effectively on the commissioning of SEND transport and post-16 college places. This would mean collaboration across sub-regional borders.</p>	<p>17. Inner London representatives from the pan-London SEND commissioning hub should outline a business case and then develop and pilot inner London collaboration.</p> <p>The business case should explore the costs and benefits of different options for inner London to ensure the pilot is well-focused. As with the sub-regional pilots, this should proceed with a group of ready and willing inner London local authorities, with the option for further local authorities to join later.</p> <p>The scope of the pilot will be determined by this work but is likely to focus on transport or post-16 college places.</p>	<p>Inner London representatives from Pan-London SEND commissioning hub</p>	

Recommendations implementation roadmap

The implementation roadmap below lays out the timeline and dependencies for implementing the recommendations above. The timeline has been developed following discussions about feasibility with key stakeholders.



Deliverable from this project
 Dependent on success of previous steps

Appendix 1: Glossary of terms

- **ASD** – Autistic Spectrum Disorder
- **Cognition and learning needs** – This covers the SEND primary needs of SpLD, MLD, SLD, and PMLD
- **DfE** – Department for Education
- **EHCP** – Education, Health and Care Plan. This is a legal document issued by a local authority to a young person between 0 and 25 years old with complex special educational needs or disabilities. It outlines their educational, health and social care needs, including their specific education placement
- **HI** – Hearing Impairment
- **LA** – Local authority
- **MLD** – Moderate Learning Difficulty
- **MSI** – Multi-Sensory Impairment
- **PD** – Physical Disability
- **PMLD** – Profound and Multiple Learning Difficulty
- **Resourced provision** – Where places in a mainstream school are reserved for pupils with a specific type of SEND need. Pupils are taught mainly in mainstream classes, but require some specialist facilities around the school
- **SEMH** – Social, Emotional and Mental Health
- **SEN unit** – Special provisions in mainstream schools where pupils with SEND are taught mainly in separate classes
- **SEND** – Special Educational Needs and Disabilities
- **Physical and sensory needs** – This covers the SEND primary needs of HI, PD, VI and MSI
- **SLCN** – Speech, Language and Communication Needs
- **SLD** – Severe Learning Difficulty
- **SpLD** – Specific Learning Difficulty
- **VI** – Visual Impairment

Appendix 2: Sub-regional geography

Inner and outer London

In several places of this analysis, we refer to inner and outer London. In line with London Councils, these are defined as follows:

- **Inner London** - City of London, Camden, Greenwich, Hackney, Hammersmith & Fulham, Islington, Kensington & Chelsea, Lambeth, Lewisham, Newham, Southwark, Tower Hamlets, Wandsworth, Westminster
- **Outer London** - Barking & Dagenham, Barnet, Bexley, Brent, Bromley, Croydon, Ealing, Enfield, Haringey, Harrow, Havering, Hillingdon, Hounslow, Kingston, Merton, Redbridge, Richmond, Sutton, Waltham Forest

London's sub-regions

In several places of this analysis, we refer sub-regions of London. Following the NHS ICB structure, these are defined as follows:

- **North Central London** - Barnet, Camden, Enfield, Haringey, Islington
- **North East London** - Barking and Dagenham, City of London, Hackney, Havering, Newham, Redbridge, Tower Hamlets, Waltham Forest
- **North West London** - Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and Chelsea, Westminster
- **South East London** - Bexley, Bromley, Royal Borough of Greenwich, Lambeth, Lewisham, Southwark
- **South West London** - Croydon, Kingston upon Thames, Merton, Richmond upon Thames, Sutton, Wandsworth

Mime

The Print Rooms
164-180 Union St
London, SE1 0LH

info@mimeconsulting.co.uk

www.mimeconsulting.co.uk

0208 099 4240

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