

Discussion paper

SEND groupings policy

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**Confederation
of School Trusts**

The voice of school trusts

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Introduction

The White Paper sets out the government's expectation for all schools to be in a school trust. As we work towards this desired end state, the White Paper and SEND consultation also propose transition arrangements to enable the reforms to the SEND system to proceed.

The May 2026 Kings Speech announced a new 'Education for All' Bill which will put into law the SEND reforms outlined in the Schools White Paper. In the [briefing notes](#) published alongside the King's Speech, the government confirms that "a bill will be brought forward to raise standards in schools and introduce generational reforms of the special educational needs system" (pages 49-53). The Bill will legislate (among other things) to require schools to pool a portion of their funding for SEND.

It is CST's view that we need to shift our mental model away from special needs education as an approach focused upon some learners with recognised needs (that is, those special educational needs and/or disabilities) to inclusive education as an approach for improving the quality of education for all learners.

This overarching aim is fundamentally important to the success of new arrangements. And it requires the group (legal entity) to be responsible and accountable not just for funding but for educational quality. We should be extremely wary of a reductionist approach which sees the sum of reform as a funding mechanism. CST has expressed concern about looser arrangements where financial governance is either entirely missing or dislocated from the responsibility for educational quality. Currently, we are reassured that this is not what the DfE is proposing.

There are two different policy imperatives that may have become conflated in the policy discourse and are worth teasing out:

1. Things that need to happen in a place; and
2. Things that need to happen to smooth funding for children who may require exceptional resource (that which cannot be met reasonable by the school's IMF); and to create a forum for collaboration and share expertise and resources.

Things that need to happen in a place

Arrangements for **local strategic SEND partnerships** convened by the local authority to develop local inclusion plans, ensure sufficiency of places in specialist provision (inclusion bases, special schools and alternative provisions) and develop plans for the 'Experts at Hand Service.'

Pooled IMF will not be used for this purpose and SEND partnerships should not be confused or conflated with SEND school groupings.



Things that need to happen to smooth funding for children and share expertise and resources

The SEND Reform Consultation states that SEND groupings must **pool part of their IMF to cater for children who are admitted to mainstream schools who require exceptional resource** (beyond what could reasonably be expected to be provided by the school's own IMF). This is important and necessary to the creation of the new system.

CST's position is that a 'responsible body' (broadly an academy trust or local authority) should perform this role. Standalone and smaller trusts without sufficient scale will need to make strategic decisions about which responsible body they wish to be part of for the purposes of the pooled IMF and put in place a contractual agreement between the two entities such that the one trust becomes the accountable body and is responsible for the financial governance of the pooled IMF.

For maintained schools, this is likely (but is not necessarily) the local authority. A maintained school on a secure pathway to joining a trust could decide to become part of that group for the purposes of the pooled IMF. There may be a very limited number of local circumstances where a different structure could be used but this should always be a legal entity with strong financial governance, with a defined responsible for the quality of education.

A second set of functions of the school groups set out in the SEND Reform Consultation Document is to use IMF to 'create a **forum for collaboration**, sharing expertise, peer review and challenge to improve inclusion' (p.91) and/ or to 'share resourcing, staffing, support bases and commissioning of shared resources such as specialist teachers' (p.93). These functions should be the role of a responsible body with financial governance, employer responsibilities and clear accountability for the strategic use of resources.

It is essential that responsible bodies maintain responsibility and accountability for pooled IMF because this requires strong financial governance and must be directly aligned to responsibility and accountability for educational quality.

For clarity, we do not believe that the DfE is proposing looser local arrangements for example SEND cluster models, but this model has gained some traction in some local areas. A SEND cluster model risks entrenching the concept of a two-tier education system: where responsible bodies are accountable for educational provision for most children and some other entity or partnership (the SEND grouping) is responsible and accountable for the educational provision for children with SEND.

Why the SEND cluster model cannot work

While the conceptual framework of a "SEND Cluster Model" initially offers an attractive solution, an implementation analysis reveals significant risks and friction points. The cluster model inadvertently conflicts with national educational reforms, dilutes school-level strategic leadership by separating SEND resourcing from whole-school budget management, risks parental mistrust,



and underestimates the structural capacity pressures currently facing both school trusts and local authorities. There are also critical governance risks.

We examine the risks under the following headings:

1. Misalignment with national reforms and accountability
2. De-structuring school leadership and SENDCO capacity
3. Shifting the deficit narrative

Misalignment with national reforms and accountability structures

The DfE has explicitly shifted its national focus toward getting core SEND funding directly into schools to facilitate rapid, proactive provision. A SEND cluster model would reintroduce the legacy 'external gatekeeper' paradigm. It would hold back critical resource that should instead be distributed directly into school budgets by responsible bodies as part of predictable, forward-planned inclusive funding.

Under national legislation, the English education system is moving towards a fully trust-led model where all schools will belong to a school trust, monitored via trust-wide Ofsted inspections. High-performing trusts are building strategic capacity by pooling their resources to design specialised central teams deployed flexibly across their entire estate. A cluster model would reintroduce geographic silos.

Genuine national reform champions collaboration to share best practices and elevate high-quality teaching across trusts and local networks. The cluster model, by contrast, introduces forced financial co-dependency. Putting school leaders in a situation where they competing and/or bidding from a shared pot of funding does not foster organic collaboration or innovation; it creates transactional friction and a defensive gatekeeping culture.

De-structuring school leadership and SENDCO capacity

A core pillar of effective school improvement is that provision for pupils with SEND must be fundamentally embedded within whole-school and whole-trust strategic leadership. Leaders must be responsible and accountable for the quality of provision for *all* children, not some of them. The cluster model pushes accountability for children with SEND away from the responsible body towards a local grouping.

By placing the definitive decision-making power for high-needs resources into the hands of an external panel, the cluster model systematically strips operational ownership away from a school's headteacher and senior leadership team.

The cluster model reintroduces the administrative separation of SEND. It inadvertently treats SEND as a separate entity by requiring SENDCOs to attend external allocation panels. Rather than acting as strategic leaders driving high-quality teaching frameworks across their school's curriculum, SENDCOs would be forced to remain in administrative, bid-writing roles, compiling evidence portfolios to secure funding from peer panels. Crucially, this would be occurring at a time



when national SEND reforms are explicitly designed to direct high-needs funding straight to schools to facilitate rapid, proactive provision. Introducing a local rationing panel entirely undermines this national trajectory, trapping time-poor specialist leaders in bureaucratic loops instead of allowing them to deploy resources directly.

The cluster model may be marketed to schools as a benefit for staff well-being, stating that the panels provide SENDCOs with a supportive network for group supervision, moderation, and professional training. While these development needs are critical, tying them to a competitive funding mechanism is counterproductive.

High-quality group supervision, quality assurance, and peer training can and should be organised independently by the local authority or trusts without aligning finite funding to the meetings. By introducing a competitive funding pot into these sessions, the model fundamentally compromises the very space it claims to provide.

Shifting the deficit narrative

Proponents argue the cluster model moves away from a "deficit-led" system where a child must fail to trigger an EHCP. However, in practice, because the cluster fund is a fixed pot, the model simply moves the deficit narrative to a local level. To win a small portion of funding from a peer panel, a school must still bring a child who is not making progress to the meeting, actively proving deficit and lack of growth to convince neighbouring headteachers or leaders.

True progress for SEND pupils is driven by high-quality, adaptive classroom teaching, such as funding additional, permanent staffing to allow flexible, teacher-led learning groups. The tiny pockets of funding accessible via a cluster panel will never be robust enough to finance structural, long-term changes. Instead, it naturally forces schools to apply for low-cost, short-term "pull-out" interventions, which research shows have limited efficacy for long-term pupil outcomes. This prevents headteachers from treating inclusion funding as a predictable foundational element of their core whole-school offer. Instead of allowing senior teams to design permanent, inclusive provision within their main budget, it forces them to operate SEND as a separate, short-term financial ecosystem dependent on external committee approval.

Conclusion

CST's proposal is that the DfE should identify the strategic planning functions that need to happen in a place and these should be the responsibility of the Strategic Local SEND Partnership. Separately, the DfE should clarify the role of responsible bodies for pooled IMF (smoothing funding for children who may require exceptional resource which cannot be met reasonable by the school's IMF; and collaborative structures where expertise and resources are shared).





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