

23 July 2026

Dear Sir/Madam

Draft Refreshed SEN Framework for Specialist Provision - Public Consultation

Background

- As the support body for almost half of the schools in Northern Ireland, the Controlled Schools' Support Council (CSSC) welcomes this opportunity to respond to the Education Authority's (EA) Draft Refreshed SEN Framework for Specialist Provision - Public Consultation.
- The controlled sector is the largest education sector in Northern Ireland, representing 49% of all schools. CSSC supports controlled schools in Northern Ireland which include Nursery Schools, Primary Schools, Secondary Schools, Grammar Schools, Integrated Schools, Special Schools and Irish-Medium Schools. Additionally, 27% of children and young people who attend controlled schools are entitled to Free School Meals.
- 38 of 40 Special Schools in NI are controlled schools and 32,250 pupils with Special Educational Needs (SEN) are educated within controlled schools.

Policy Background

- The Independent Review of Education (IRE) stated that 'Education is the greatest investment any society makes in its own future. Responsible citizenship, prosperity and fulfilled lives depend on it. In a world changing at an unprecedented pace, peace and prosperity depend on education more than ever before.'
- CSSC continues to be concerned about the impact of underfunding on our education system. The significant funding deficit facing education, with schools reporting deficits and infrastructure delays directly undermines efforts to support our children and young people.

Controlled Schools' Support Council www.csscni.org.uk
Registered with The Charity Commission for Northern Ireland NIC107873
A company limited by Guarantee Registered in Northern Ireland NI619273

- The profile of our pupil population has continued to change over recent years resulting in increased pressures in SEN provision. SEN Transformation is a priority for the Northern Ireland Executive and adequate resourcing is essential to support the SEN Reform Agenda and deliver 'Better Support for Children and Young People with Special Educational Needs'.
- Effective multi-agency working is required without delay to improve outcomes for children and young people with SEN. Enhanced partnership working between Education and Health is vital as early identification supports earlier intervention and better outcomes.
- As noted in the TransformED NI strategy published in March 2025, 'The growing economic power houses of the 21st century are those nations that have placed an absolute premium on getting their education system right. Northern Ireland must do the same'. This aligns with CSSC's position that education is not merely an expense but an investment in Northern Ireland's future.

Funding

- CSSC has publicly raised concerns regarding the significant constraints on education funding and its impact on our children and young people. This follows over a decade of systemic underfunding of education in NI evidenced by reports from the Institute of Fiscal Studies.
- Historic underfunding has resulted in reduced school budgets which has impacted negatively upon services provided to all schools by EA but particularly Controlled Schools. It is vital that the Northern Ireland Executive agree a multi-year budget with an adequate and appropriate settlement to give schools the opportunity to plan and implement new processes such as the Enhanced Support Model (ESM) but also current programmes such as nurture funding and extended schools.

Vision

- CSSC acknowledges the Education Authority's (EA) publication of the Draft Refreshed SEN Framework for Specialist Provision and welcomes the opportunity to provide comments on behalf of the controlled sector.
- CSSC notes EA's aim and vision remain unchanged from the original Framework for specialist provisions: 'to strengthen, standardise and modernise specialist provision in

schools so that children and young people with a Statement of SEN can access high-quality, needs-led support in an appropriate setting. The EA's vision is for a 'a flexible and agile network of specialist provision complementary to special schools.'

- CSSC agrees with the aim and vision and notes alignment with the vision articulated in DE's Special Educational Needs Reform Agenda which, with its accompanying Delivery Plan, aims to ensure that that 'children and young people with SEN receive the *right support, from the right people, at the right time and in the right place.*'
- Successful delivery of both visions must be supported by workforce capacity, clear operational planning and sustained and strategic investment in SEN services, with funding levels sufficient to address rising demand, increasing complexity of need, and pressures across the education system. Without these, there is a risk the vision remains aspirational rather than deliverable.

Guiding principles

- CSSC broadly supports the guiding principles for the establishment of specialist provisions in schools which determines that the EA will be '*child centred, inclusive, outcomes focused, equitable, transparent and collaborative*'.
- However, it would be useful for these principles to be expanded to include a more explicit acknowledgment of the need to support the capacity of 'highly skilled, competent and empathetic staff' to deliver the high-quality education that our children and young people with SEN require. Professional development to address capacity in schools must be responsive to the changing and more complex presentation of special educational needs that our staff are experiencing in schools and informed by practitioner views.
- CSSC recommends strengthening the existing principles by explicitly including, deliverability and sustainability, workforce wellbeing and capacity and parental confidence and informed choice.

- There is limited recognition of the critical role that the wider education system plays in developing, supporting and sustaining a skilled workforce capable of achieving these outcomes. Explicitly acknowledging workforce development as a guiding principle would reinforce the importance of ongoing professional learning in delivering high-quality outcomes for children and young people.
- The DE TransformED NI Strategy for Teacher Professional Learning has a specific vision for Teacher Professional Learning which is to build an expert, confident teaching profession through high-quality, career-long professional learning that drives system excellence. The Principles of the Draft Framework should seek to emulate this commitment to workforce development for both teaching and non-teaching staff.
- CSSC shares DE's view that the quality of teaching is the single most important in school factor in influencing pupil outcomes, closely followed by the quality of school leadership.' Professional learning responsive to the needs of our teaching workforce should therefore be a priority for this refreshed SEN Framework for Specialist provision in schools.
- As with all aspects of professional learning, CSSC strongly recommends ongoing engagement with practitioners to identify priority areas for development and to ensure that learning opportunities are responsive to the needs of the workforce and the children they support.
- CSSC notes that in realising the EA's vision for Specialist Provision in Schools, it was necessary to develop criteria, as well as indicators for each of these criteria, to support in the identification of schools to establish specialist provision which include consideration to a quality educational experience and a clear commitment to inclusion supported by a positive ethos.
- There is a clear demand for new specialist provision classes in mainstream schools and in response the number of specialist provision classes has increased, as outlined in the refreshed framework document, it is important that a long-term view of demand be taken. The pupil population is projected to decline by 20% over the next decade. Therefore, it is important that this projected decline is considered when selecting schools in which specialist provisions will be established. Schools must be sustainable in the long term to ensure the inclusive nature of all SEN placements.

- CSSC notes that while stable enrolment trends are among the criteria which will be used to identify schools in which to establish specialist provision, the refreshed framework stipulates that EA will consider schools with 'more than 60 pupils' and in 'exceptional circumstances' will consider schools 'with fewer than 60 pupils but more than 40 pupils.' While conscious that the criteria and indicators have been adapted to reflect the increasing demand for specialist provisions, EA will be aware that these figures are not in accordance with the Schools for the Future: A Policy for Sustainable Schools minimum enrolment thresholds of more than 105 pupils in a rural primary school and 140 pupils in an urban primary school and could potentially jeopardise one of the key principles of the framework.
- Criterion E which requires schools to demonstrate a clear commitment to inclusion is accompanied by an indicator which describes an expectation of a commitment from schools to work within an EA developed common framework of training for teaching and non-teaching staff in specialist provision so that the learning outcomes of pupils can be maximized. As previously mentioned, the document should emphasise the importance of a system level commitment to the professional development of all staff, a commitment very recently articulated in DE's TransformED NI Strategy for Teacher Professional Learning.

Resourcing specialist provisions in mainstream schools

- CSSC notes that EA has developed support for schools in the establishment of specialist provision through advice and guidance, provision of accommodation, furniture, equipment and staffing and that once established EA's Specialist Provision Service provides ongoing advice and guidance, practical support, training and ongoing hub for cluster working through to individual support.
- CSSC notes that an Enhanced Support Package has also been established in EA's efforts to identify new provision which in addition to the set-up allowance of £3,000 and funding

for furniture and equipment (£20,000) includes a whole school learning and development offer, SENCO release and administrative support.

- CSSC welcomes the resourcing of schools' efforts to establish specialist provision classes but notes that the resource available to schools to meet the needs of children and young people with SEN in specialist provision classes needs to be provided on a consistent basis to all schools who support this provision. CSSC is aware of long-established provisions which would also benefit from the additionality outlined in the Enhanced Support Package for new provisions in 2026/27, specifically the SENCO release, the Learning and Development and administrative support outlined to school leaders in the Working Together on SEN Provision workshops.
- CSSC is conscious that all settings have experienced an increasing complexity of need in recent years and, with due consideration to staff turnover in schools, the need for refresher training or new training to meet complex needs for many provisions should be explored. It would be useful to provide schools with support to manage unfilled staff vacancies, management of organisational demands and ensuring adequate time and resource allocation.
- Adequate resourcing of specialist provisions in mainstream schools is integral to ensuring that the Department's vision to provide all children with SEN with the Right Support, from the Right People, at the Right Time and in the Right Place, is realised.

Other comments

- In our February 2021 response to the consultation on the Draft Framework for Specialist Provision in Mainstream Schools, CSSC noted principal concerns about the lack of operational detail in the document. CSSC recommends that in the absence of a more user-friendly website, that the draft framework should include criteria schools can work towards for mainstream schools who are interested in establishing specialist provisions in mainstream schools (hosted on the website under the title, Establishing Specialist Provisions in Mainstream Schools). This would enable school leaders and Boards of Governors to more fully consider the implications for their individual settings.

Conclusion

- CSSC is broadly supportive of the refreshed SEN framework for Specialist Provision and understands the contribution that the inclusion of specialist provision classes can have on creating a positive school ethos.
- If the aspiration of a high-performing and continually improving education system is to be realised, however, schools must be supported with the resources and the development opportunities that will support staff in meeting the needs of our children and young people with SEN.
- Conscious of the significant pace and scale of change associated with the TransformED, investing in schools and the workforce will be critical in enabling them to navigate change with confidence and deliver high-quality teaching and learning that improves outcomes for children and young people with SEN.

CSSC is happy to discuss this response with the Education Authority.

Yours faithfully,



Mr Mark Baker
Chief Executive