

SEND Voices Wokingham (SVW)

EOTAS Consultation Response

Basis of response. This response brings together anonymised feedback from Wokingham parent carers, including historic local EOTAS feedback and feedback gathered during Summer Term/Summer 2026, alongside the consultation question structure supplied in the submitted response document. Personal names, email addresses and identifying details have been removed.

SVW overarching position. EOTAS must remain a genuinely needs-led, individualised educational pathway. Reform should strengthen accountability, consistency, quality and safeguarding without removing the flexibility that enables children and young people who cannot access formal settings to receive suitable education.

Consultation responses

1. How can we best support the needs of children and young people who are not eligible for a Specialist Provision Package but are unable to continue their education in a formal setting?

A clear statutory duty must remain on local authorities to secure suitable education for children and young people who cannot access a formal setting, including those without an EHCP or Specialist Provision Package. There must be no gap in entitlement while schools, health services and local authorities determine responsibility.

SVW families consistently describe delays, unclear processes and children spending prolonged periods without appropriate education. Reform should therefore establish clear statutory timescales, named accountability and transparent escalation routes. Schools should be expected to demonstrate reasonable adjustments and their best endeavours, but where the barrier is lack of capacity, expertise, resources or the suitability of the environment itself, the local authority must intervene promptly.

Provision must be based on the individual child's needs rather than a restricted menu of available or approved provision. Reintegration should not be a condition of receiving support: for some children the formal educational environment is itself the barrier to learning and wellbeing.

Children, young people and parent carers must be meaningfully involved in deciding what suitable education looks like. The system should focus on access to education, wellbeing, progress and outcomes, rather than attendance at a particular type of setting.

2. Which approach to commissioning and overseeing EOTAS arrangements do you think would work best?

SVW supports a dedicated EOTAS function within the local authority SEND service, rather than transferring primary responsibility to a named school or FE setting.

Local feedback demonstrates the importance of having an experienced, knowledgeable EOTAS lead who understands children and families. However, families also report that adding an EOTAS lead without clear authority and accountability can create another layer between families and SEND decision-makers. A dedicated EOTAS function must therefore have sufficient authority, capacity and access to decision-making to ensure provision is actually commissioned and delivered.

The function should coordinate the whole package, provide a consistent point of contact, oversee annual reviews and outcomes, support access to professionals and examinations, coordinate providers, and ensure safeguarding and quality assurance. Families should not effectively be required to undertake the role of SENCO, commissioner and case coordinator themselves.

Responsibility must remain needs-led. EOTAS should not be constrained by a predetermined package or limited provider list. The local authority, as the body holding the statutory responsibility, must remain clearly accountable for securing suitable provision and ensuring the provision specified in the EHCP is delivered.

3. Under your preferred approach, what support, capacity or safeguards would be needed to enable the named school or further education setting and/or local authority to undertake their roles effectively?

A dedicated EOTAS function requires specialist knowledge, sufficient staffing, clear delegated authority and transparent responsibilities. Families need one accountable lead who can coordinate provision across SEND, education, health and providers, rather than having to chase multiple professionals themselves.

Statutory guidance should clearly define who commissions provision, confirms funding, monitors delivery, coordinates annual reviews, oversees safeguarding and quality, arranges professional input and access arrangements, and resolves problems when provision is delayed or breaks down. Clear timescales are essential.

Local experience shows that good communication from an EOTAS lead cannot compensate for wider system delays if case officers, panels and commissioning processes do not respond. The EOTAS function therefore needs authority to progress decisions and escalate failures.

Funding arrangements should avoid requiring families to pay significant education costs upfront and reclaim them. Direct payments, payment cards or business-to-business arrangements should be available where appropriate.

Safeguards should include independent challenge, transparent decision-making, consideration of professional evidence, meaningful parent and young person involvement, continuity when staff change, and regular review of whether provision remains suitable and is delivering EHCP outcomes.

4. What safeguards should be in place to support consistent, needs-led decisions about when EOTAS is the most appropriate way to meet a child or young person's needs, including where suitable school or further education provision may be limited or unavailable?

There must be clear statutory guidance and a consistent evidence-based test for determining when EOTAS is appropriate. Decisions should focus on whether the child or young person can realistically access and sustain suitable education within a formal setting, not simply whether a placement technically exists.

Professional evidence from education, educational psychology, health and therapy services should be properly considered, alongside the experiences and views of the child, young person and family. Blanket policies or additional local thresholds should not override individual evidence.

Local families report inconsistent decisions, unclear panel processes and uncertainty about how decisions are reached. Decision-making criteria, evidence considered, reasons for decisions and routes of challenge should therefore be transparent and provided in writing.

Availability must not be confused with suitability. A school having a place does not demonstrate that it can meet need or that the child can access education there. Equally, lack of an available school should not result in a child being left without education.

EOTAS must remain genuinely individualised, flexible and capable of drawing on a range of providers. Safeguards should prevent cost, commissioning arrangements or a restricted approved-provider list from taking precedence over assessed need.

5. What factors are important for effective reintegration planning for children and young people receiving EOTAS provision?

Reintegration should never be assumed to be the objective for every child receiving EOTAS. The starting point must be the child or young person's needs, wellbeing, wishes and long-term outcomes.

Planning must first understand why EOTAS became necessary. For many families, previous educational experiences involved unmet need, placement breakdown, significant anxiety, distress or trauma. Returning to a formal setting without addressing those underlying barriers risks undoing progress and causing further harm.

Where reintegration is appropriate, it should be co-produced with the child, family, EOTAS professionals, receiving setting and relevant health and education professionals. The receiving setting must demonstrate that it can meet need and put adjustments, staffing, expertise and support in place before transition begins.

Transitions should be gradual, flexible and regularly reviewed, with the ability to pause, adapt or reverse the plan if it is not working. There should be no arbitrary timetable.

Success should be measured through access to learning, emotional safety, engagement, progress and longer-term outcomes, rather than attendance alone. For some children, a well-designed EOTAS package will remain the most appropriate long-term educational pathway.

6. What safeguards are needed to ensure reintegration planning best supports progress and the child or young person's long-term outcomes?

The principal safeguard is that reintegration must not be automatic, time-limited or treated as the definition of successful EOTAS. For some children, the formal education environment is the barrier to accessing education.

Any proposal to reintegrate should be based on robust evidence that the factors which made the previous setting unsuitable have been addressed and that the proposed setting can meet the child's needs. The child or young person's readiness, wellbeing and views must be central, alongside parent carer and professional evidence.

There should be a written, co-produced transition plan setting out adjustments, support, responsibilities, timescales, review points and what will happen if difficulties emerge. Provision should not be withdrawn in advance of a successful transition.

Families must retain a clear route to challenge decisions. Reintegration should never be used primarily to reduce cost or local authority responsibility.

Local feedback shows that fear of being forced back into school can itself increase anxiety and block progress. Families and children therefore need confidence that EOTAS will not be removed simply because progress has been made. Progress may demonstrate that the current provision is effective, rather than that it is no longer needed.

7. What arrangements are needed to provide parents with a clear route to resolve disputes if decisions are made about whether new EOTAS provision should be put in place, or to change or cease EOTAS provision already in place?

Families need a clear, accessible and genuinely independent route to challenge decisions about starting, changing or ceasing EOTAS. Existing SEND Tribunal appeal rights relating to EHCP provision and placement should be retained.

An internal local authority review or panel reconsideration may be useful as an early resolution stage, but it cannot replace independent scrutiny. Families should receive written decisions setting out the evidence considered, reasons, responsible decision-maker and available challenge routes.

There should be strict timescales for resolving disputes because delay can leave a child without education and can cause providers to withdraw available places. Local families have reported decisions and funding remaining unresolved close to the start of an academic year, despite annual reviews having taken place months earlier.

Existing provision should normally remain in place while a disputed decision to reduce or cease EOTAS is challenged, unless there is a clear safeguarding reason otherwise. Professional evidence, including privately commissioned evidence from appropriately qualified professionals, should be considered on its merits.

Dispute resolution must be free, understandable and accessible, with mediation available but not used as a barrier to independent appeal.

8. Do you agree or disagree that non-school alternative provision delivering EOTAS special educational provision to children of compulsory school age should be required to comply with new national regulatory standards?

SVW agrees that proportionate national standards should apply to new EOTAS arrangements to strengthen safeguarding, quality and consistency. Children receiving EOTAS deserve robust protections and high-quality education.

However, standards must reflect the nature of EOTAS. EOTAS is not school delivered elsewhere: provision may be highly individualised, therapeutic, interest-led and delivered by several different providers. Regulation should focus on safeguarding, competence, suitability, quality and outcomes rather than requiring providers to replicate school structures.

Existing successful arrangements need strong transitional protection. Families have often spent considerable time building packages that a child can finally access. New requirements should not retrospectively destabilise effective provision or remove trusted providers solely because the regulatory framework has changed.

National standards must also avoid creating a narrow approved-provider market. Smaller specialist providers can be essential to genuinely personalised packages. There should be proportionate routes for providers to demonstrate quality without creating administrative or financial barriers that unnecessarily reduce capacity.

Any changes should be phased, with clear guidance and sufficient implementation time so children do not lose education while providers adapt.

9. Do you agree or disagree that local authorities should be responsible for quality assuring non-school alternative provision delivering special educational provision EOTAS for children of compulsory school age?

SVW supports robust quality assurance but does not believe the local authority should be the sole regulator or quality assurer of EOTAS provision.

The local authority must retain responsibility for securing suitable education, monitoring whether an individual package is being delivered and ensuring EHCP provision and outcomes are met. However, where the same organisation commissions, funds, approves and quality assures providers, there is potential for conflict between quality, cost and commissioning priorities.

A national independent regulatory or quality assurance framework would provide greater consistency between areas, while local authorities should retain operational oversight of individual children's packages.

Quality assurance should be proportionate and focus on safeguarding, provider competence, suitability for the individual child, delivery of agreed provision and outcomes. It should include feedback from children, young people and families.

Importantly, quality assurance must not become a mechanism for restricting families to a small local authority provider list. The question should remain whether a provider is safe, suitable and effective for that child or young person.

There should also be transparent processes for raising concerns and clear responsibility for acting when provision is not delivered or a provider is no longer suitable.

10. For young people aged 16-25, should quality assurance and oversight arrangements of EOTAS provision align with the approach proposed for children of compulsory school age?

Yes. The same principles of safeguarding, accountability, suitability and independent quality assurance should apply to young people aged 16-25.

However, the framework must recognise that post-16 provision is naturally broader and should support Preparation for Adulthood outcomes, including further education and training, employment, independent living, community participation and developing independence.

Local feedback has highlighted the risk that young people receiving EOTAS can miss support routinely available through schools, including Preparation for Adulthood planning, professional input and support to access examinations or qualifications. Oversight arrangements should specifically guard against this.

Quality assurance should therefore ensure that the young person's programme is coherent, appropriately ambitious and supports the outcomes in their EHCP, while preserving flexibility to use different providers and community-based opportunities.

Young people should be increasingly involved in directing their own provision and should not be unnecessarily dependent on a parent to coordinate or transport them. Packages should be able to include support that builds independence where this is required.

The same accountability principles should apply across age groups, but the content and delivery of provision must remain age-appropriate and individually tailored.

11. When should assessment take place, if at all, for children and young people on existing EOTAS arrangements?

SVW supports assessment at key transition points, alongside the existing annual review process and earlier reassessment where there is evidence that needs have materially changed.

Assessment should have a clear purpose: to understand current needs, progress, aspirations and the provision required for the next stage. It must not become a routine mechanism for reducing provision, pursuing reintegration or moving children into a predetermined Specialist Provision Package.

Families report that annual review delays already create uncertainty about funding and provision for the following academic year. Any new assessment process must therefore be properly resourced and completed early enough for decisions, commissioning and funding to be confirmed well before provision is due to start.

Assessment should include the child or young person's views, parent carer evidence and relevant professional advice. It should consider educational progress, wellbeing, independence, Preparation for Adulthood and whether the current package is meeting EHCP outcomes.

Where an existing EOTAS arrangement is working well, continuity and stability should be given significant weight. Change should only be made where evidence shows that different provision would better meet the child or young person's needs and improve outcomes.

12. If a needs assessment takes place and a child of primary age is assessed as eligible for an EHCP, do you agree that they should move onto a Specialist Provision Package, with any EOTAS arrangements managed in line with the proposals set out in Chapter 1?

No. Eligibility for an EHCP should not automatically result in a child moving onto a predetermined Specialist Provision Package.

An EHCP exists to identify the individual child's needs and specify the provision required to meet them. The provision must follow from assessed need, rather than the child being fitted into a standard package.

This is particularly important for children already receiving EOTAS. Their provision may have been developed following significant barriers to school attendance, placement breakdown or evidence that a formal setting cannot meet their needs. If that arrangement is suitable, accessible and producing positive outcomes, it should not be destabilised simply because a new framework is introduced.

SVW families value EOTAS precisely because it can be flexible, bespoke, therapeutic and based around a child's interests and abilities. Any future framework must preserve that flexibility.

A Specialist Provision Package may be appropriate for some children, but it should be an option determined through assessment and co-production, not an automatic consequence of EHCP eligibility. Any proposed change should require clear evidence that it will meet the child's needs at least as effectively as the existing arrangement.

13. If a needs assessment takes place, what should be the next step for those who are not eligible for an EHCP?

A flexible, case-by-case approach is essential. A child who is not eligible for an EHCP must not lose access to suitable education or automatically be expected to return to a formal setting.

The assessment should identify what is preventing the child from accessing education and what provision is required. Where a child has been successfully accessing EOTAS or alternative provision, progress should not be interpreted as proof that support is no longer needed; it may demonstrate that the provision is working.

There must remain a clear statutory route for local authority involvement where a child cannot access suitable full-time education through a school. Children should not fall between school responsibilities, health services and SEND thresholds.

Any transition should be based on individual need, professional evidence and the views of the child and family. Where reintegration is appropriate it should be gradual, supported and reversible if it is unsuccessful.

For children without an EHCP, accountability is particularly important. There should be a named professional responsible for ensuring suitable education is in place, regular review of progress and clear escalation routes if provision is delayed or unavailable.

14. Which factors best support stable transitions and progression for children receiving EOTAS, including return to education where appropriate?

Stable transitions depend on continuity, trust, good planning and a clear understanding of why EOTAS was required. Transition should never be pursued simply because a child has made progress or reached a particular age.

Children and young people, their families and relevant professionals must be meaningfully involved. The receiving provision must demonstrate that it can meet need before a transition begins, with staffing, adjustments, therapeutic support and specialist expertise in place.

Transitions should be gradual and flexible, with regular review points and the ability to pause or change course. Existing EOTAS provision should not be withdrawn prematurely.

A consistent, experienced case coordinator is particularly important because EOTAS packages often involve multiple providers and professionals. Local families have described arrangements becoming disjointed and parents effectively undertaking the SENCO and coordination role themselves.

Progression must also include Preparation for Adulthood, qualifications, access arrangements, social opportunities and developing independence. It should not be defined solely as return to school.

Success should be measured through sustained access to education, wellbeing, engagement, learning, independence and achievement of EHCP outcomes. For some children and young people, stable progression will mean continuing EOTAS.

15. How effective is the current system in enabling schools to put in place early support for children whose health needs affect their participation in education, before requiring the local authority to arrange alternative provision?

SVW considers the current system inconsistent and therefore only somewhat effective. Some schools provide strong early support and reasonable adjustments, but families' experiences vary considerably.

Too often, support is not implemented early enough, or families encounter uncertainty about whether responsibility sits with the school, SEND service, health service or local authority. Children can then experience long periods of reduced or no education while professionals determine responsibility.

Schools need timely access to specialist advice and sufficient resources to implement reasonable adjustments. Health and education services also need clearer mechanisms for sharing evidence and jointly planning support. Families should not be required to coordinate fragmented systems themselves.

There should be clear national expectations about the support schools should consider, how attendance-related distress and health needs are assessed, when additional professional input is required and when the local authority's duty to arrange alternative provision is triggered.

Early intervention should focus on understanding the reason the child cannot access education, rather than treating non-attendance primarily as a behavioural or attendance-management issue. The objective must be to restore access to suitable education without allowing delay to deepen distress, disengagement or educational loss.

16. How could roles and responsibilities between schools, local authorities and health services be clarified to support more timely and effective support for children who are unable to attend school due to health reasons and require alternative provision?

Roles should be explicitly set out in legislation and statutory guidance, supported by a clear pathway showing who is responsible at each stage, required timescales and escalation arrangements.

Schools should make reasonable adjustments and use their best endeavours, but where a child cannot access suitable education in school because of health needs, the local authority must act promptly. Responsibility should not be delayed while services debate whether the difficulty is primarily educational, medical or SEND-related.

Health professionals should have clear responsibilities to provide timely evidence about the child's needs, functional impact and adjustments required. Education and health information should be brought together through a genuinely multi-agency process.

A named lead should coordinate the plan and communicate directly with the family. Local EOTAS feedback demonstrates that unclear ownership results in delayed panel decisions, unconfirmed funding and provision not being implemented. A lead role is only effective if that person has authority to escalate and secure action across services.

There should be shared written plans, clear decision records and accountability when timescales are missed. Families should never be left to act as the communication channel between education, health, SEND and providers.

17. Where an alternative provision placement is required to meet health needs, how can children be better supported to transition back into a school?

A successful return is only possible where the reasons the child became unable to attend have been understood and addressed. Alternative provision should not automatically be treated as a short-term holding arrangement whose success is measured by return to the previous school.

Planning should be co-produced with the child, family, school, local authority, health professionals and alternative provision provider. The receiving school must demonstrate that it can meet the child's current needs and should put required adjustments and support in place before transition begins.

The plan should be gradual, flexible and responsive to the child's wellbeing, with regular reviews and the ability to pause or adapt. Existing provision should remain available during transition so that a setback does not leave the child without education.

Where the previous school environment contributed to distress or inability to attend, returning to the same circumstances without meaningful change is unlikely to succeed.

Success should be judged by sustainable access to learning, emotional wellbeing, engagement and progress, not attendance alone. For some children, a different setting, blended package, continued alternative provision or EOTAS may remain the more suitable educational pathway.

18. What approach, if any, should be taken to the duration of placements for children receiving alternative provision through Online Education Accredited Providers?

The duration should depend on the individual child's circumstances and whether online provision remains suitable, effective and supportive of positive outcomes.

Online education can serve different purposes. It may be a short-term element of support during illness or transition, but it can also be an important part of a longer-term personalised package, including EOTAS, where a child cannot access particular subjects, qualifications or learning through a physical setting.

Fixed time limits risk removing successful provision for administrative reasons rather than because the child's needs have changed. Arrangements should instead be reviewed regularly with the child, family and relevant professionals.

Reviews should consider educational progress, engagement, wellbeing, safeguarding, social opportunities, accessibility and whether the provision continues to contribute to the child's wider outcomes. Where online learning is only one element of a package, its value should be assessed within that whole package.

Continuation should not be presumed, but neither should cessation. The determining question should be whether the provision remains suitable and beneficial for that individual child and whether any proposed alternative would improve access to education and outcomes.

19. Should children receiving alternative provision through Online Education Accredited Providers remain on the admission register of a school?

This should depend on the individual circumstances and the purpose of the online provision.

For some children, accredited online education is an additional element of a school-based or blended package. Where the school continues to provide meaningful oversight, support, safeguarding and other elements of education, remaining on roll may be appropriate.

For others, particularly where the school environment itself is unsuitable and the child is receiving EOTAS, retaining a school place may provide little educational benefit and can blur accountability. A child should not remain nominally on roll simply to preserve an administrative arrangement where there is no meaningful educational relationship with the setting.

The decision should consider where and how education is delivered, who is coordinating the overall programme, safeguarding arrangements, whether the school can meet the child's needs and whether remaining on roll adds genuine value.

There should not be a blanket rule. The focus must remain on suitable education, clear accountability and the child or young person's outcomes. Where a school place is retained, this must not reduce the local authority's responsibility to secure the EOTAS or alternative provision the child requires.