



The Rt Hon Bridget Phillipson MP
Secretary of State for Education
Department for Education
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT

18 May 2026

Dear Bridget,

I am writing on behalf of the All-Party Parliamentary Group (APPG) for the Armed Forces Community to submit our response to the Government's SEND consultation. This draws on a roundtable hosted jointly by myself, Alex Baker MP and Minister Georgia Gould, bringing together Service families with direct lived experience, researchers from Oxford Brookes University, the three Armed Forces Families Federations, Royal British Legion (RBL), and Soldiers', Sailors', and Airmen's Families Association (SSAFA). It also draws on written evidence submitted to the APPG following that session. I am grateful to Georgia, and colleagues from the Department for Education (DfE), for their engagement, and for the constructive spirit in which that discussion was held.

The APPG broadly welcomes the ambition of these reforms. The direction of travel — earlier intervention, more consistent national standards, mandatory teacher training, and the retention of EHCPs for children with the most complex needs — is right. However, we have significant concerns about how the proposals will affect children from Armed Forces/Service families, a group whose challenges are well-evidenced, distinctive, and largely unaddressed in the White Paper.

Frequent relocations, often every 18 months to three years, mean that Service children with SEND move between local authority areas repeatedly throughout their education, often crossing the different SEND systems of all four nations of the United Kingdom. Research presented to the APPG by Oxford Brookes University found that on arrival in a new area, children are routinely placed in whatever setting has capacity rather than whichever best meets their needs. Records are rarely transferred in advance, and children regularly spend weeks or months out of education. Parents fight lengthy and costly battles, often alone while a partner is deployed.

The APPG heard testimony from a serving RAF officer with three children with SEND who described the process of securing appropriate school places on a recent posting as more stressful than any military operation he'd served on. He spent a year trying to arrange provision in advance. His son was still out of school for a month on arrival. Without turning to the tribunal process, investing thousands of pounds in private assessments, and seeking the support and intervention of SSAFA and the MOD Education Advice Team, he believes one or more of his children would have no education today. Other parents described having to decline military postings, leaving careers, and in some cases, having to rely on social services to intervene with the local education authority to secure suitable provision.

Research from Oxford Brookes University found that Service parents were consistently less satisfied with all aspects of their children's education than non-Service families, and nearly 40% of Service parents surveyed said they were considering leaving the Armed Forces, with the majority citing their children's SEND needs as the primary reason. This is a defence retention issue as well as a welfare issue.

The APPG welcomes the commitment to earlier intervention, the Experts at Hand investment, mandatory teacher training, and the aspiration to end the postcode lottery. For Service families who move frequently, any move towards greater national consistency in how needs are defined and met is genuinely positive.

Our concerns

Service children are absent from the White Paper: Despite the well-documented challenges facing this group, and the imminent extension of the Armed Forces Covenant Legal Duty to cover DfE, children from Armed Forces families are not explicitly mentioned anywhere in the White Paper or consultation document. This is a significant omission. The APPG asks that Service children are explicitly named in the White Paper, any associated statutory guidance, and the reformed SEND framework.

Portability of statutory protection: For mobile Service families, the EHCP functions not only as a support plan but as a portable statutory document that carries legal weight across local authority boundaries. We are concerned that a shift towards Individual Support Plans (ISPs), without equivalent statutory protection, will leave mobile children significantly more vulnerable to gaps in support when they move. Any reformed system must maintain and strengthen, not weaken, the portability and enforceability of children's legal entitlements across local authority and national boundaries.

The tribunal: We seek clarity on the specific changes proposed. For many Service families, the tribunal process has been the only effective accountability mechanism. The evidence shows that the vast majority of cases are decided in parents' favour.

Local authority accountability: The APPG heard consistently that the current crisis in SEND provision is not primarily a design failure in the 2014 legislation but a failure of implementation and enforcement. Local authorities have statutory duties that are routinely breached without meaningful consequence. The reforms must address this directly with clearer expectations, stronger enforcement, and real consequences for failure.

Workforce: The commitment to bring specialists into schools is only meaningful if the workforce exists to deliver it. The APPG heard serious concern that the pipeline of educational psychologists, speech and language therapists and other professionals does not exist at the scale required, and asks for a clear workforce strategy alongside the investment commitments.

Our asks

Drawing on evidence submitted by the Families Federations, SSAFA, Oxford Brookes University and the RAF Families Federation, the APPG asks the Government to commit to the following:

- Explicit recognition of Service children in the White Paper, consultation document and statutory guidance, with the forthcoming Covenant Legal Duty extension used as the legislative basis.
- A named lead in every local authority for Service children with SEND, with responsibility for coordinating transitions and acting as a single point of contact for incoming Service families - consistently applied, not discretionary.
- Advance planning before families arrive - where 45 days' notice of a posting is given, local authorities should be required to begin consultation on school places and record transfer within that period, not wait until the family has physically moved.
- Timely and standardised record transfer - children's SEND documentation must move with them, with records from devolved nations and overseas accepted and taken into

account by receiving authorities, not disregarded.

- Training on Armed Forces life embedded within mandatory SEND teacher training and reflected in Ofsted inspection frameworks, so that school and local authority staff understand the specific pressures of Service life.
- School place allocation without a residential address - guidance updated to make clear that a base address or Assignment Order can be used where confirmed accommodation is not yet available.
- Improved data on Service children with SEND, developed in partnership with the MOD, so that policy is based on accurate evidence about this group's size and needs.
- Cross-nation coordination between the four education departments to establish shared principles for the transfer of support across borders as all four systems are reformed.
- A cross-government approach for families on overseas postings, ensuring that housing, schooling and health support is coordinated in the event of an urgent return to the UK.

Conclusion

The families who gave evidence to the APPG are asking for a system that works consistently and reliably, wherever their military life takes them. The reforms set out in the White Paper have the potential to make a real difference, but only if the specific and well-evidenced challenges facing Service children are built into the design from the outset. We are grateful for the constructive engagement of Minister Gould, and we hope this submission is a useful contribution to that work.

Yours sincerely,



Calvin Bailey MBE MP
Member of Parliament for Leyton and Wanstead