

# INTERNATIONAL COMPARATIVE REVIEW

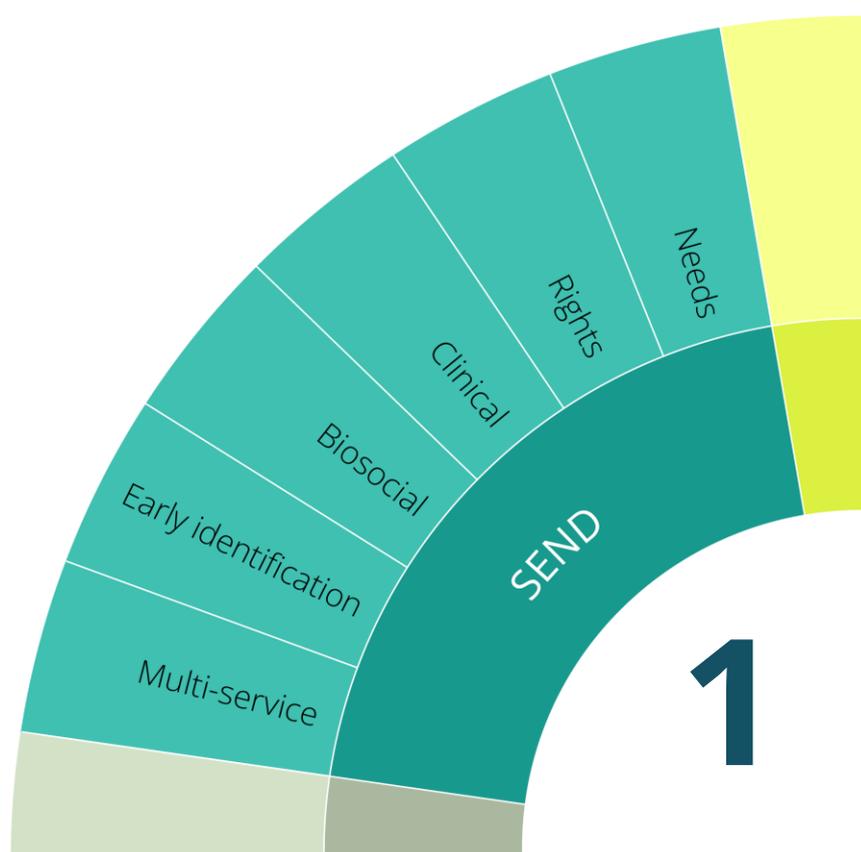
## SEND POLICY

### Special Educational Needs and Disabilities

## Summary

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Centre for Education Systems

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### **Acknowledgements**



#### **SCOPESEND**

This report has been produced in partnership with the University College of London Institute of Education's ScopeSEND team. The Centre for Education Systems' insights on SEND system structures (Section 2) and SEND policy effects (Section 5) draws from the insights from ScopeSEND's international analysis of SEND policy and practice – a Nuffield Foundation-funded project comparing SEND policy across the Centre for Education Systems jurisdictions.

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## Lessons for policymakers

### *Key takeaways*

1. **SEND identification is rising around the world, and many jurisdictions are facing growing funding pressures.** Some systems are responding by shifting resources toward early intervention and more inclusive universal provision. Evidence on whether this improves outcomes and manages funding pressures is still emerging.
2. **All jurisdictions aspire to educate more of their students with SEND within mainstream settings. However, an increasing proportion of students with SEND are educated outside of mainstream settings.** Lack of capacity and expertise within mainstream settings is likely to be driving this, combined with parental demand for the extra support provided in specialist provision. The latter is reinforced by pressures from some advocacy groups.
3. **Finite public budgets drive a need for funding prioritisation.** This remains the case regardless of whether eligibility for support is based on 'needs' or 'diagnosis'.
4. **Early selection and tracking can be a barrier to inclusion.** Systems which sort students into different pathways or groupings based on narrow measures of attainment can make it difficult to fully include students with SEND.
5. **Devolved systems can allow for local tailoring and greater responsiveness, but can also lead to inconsistency and inequity.** Less centralised approaches can also make it harder to achieve alignment between SEND policy and other policy areas.

### *Questions for policymakers*

1. **Should SEND policy be guided by needs-based or medicalised approaches?**  
This choice has repercussions for how assessment is conducted and by whom, how support is organised, and for teacher professional development. Many researchers and practitioners advocate needs-based approaches, arguing they lead to quicker and better targeted support. However, reliance on diagnosis persists because it provides clear eligibility thresholds, a legally recognisable basis for claims, and is a way for governments to ration and account for support.

2. **How should SEND assessment processes be organised?**

In-school assessments can be more flexible, support early intervention, and keep costs down. However, they risk inconsistency and depend on sufficient expertise within schools. External assessment may reduce inconsistency but increases bureaucracy and delays. Policy makers typically need to strike a balance between these two approaches.

3. **To what extent should SEND funding follow individual students?**

Categorical funding – which attaches funding to designated students – is sometimes more popular with parents and carers because it provides high-needs students with an entitlement. However, it incentivises assessment and diagnosis, potentially raising costs. In contrast, cohort – or ‘census-based’ – funding can encourage early intervention and support. In practice, a combination of both approaches is normally required at different levels of need.

4. **What balance should there be between mainstream and specialist schooling?**

Many argue that mainstream schooling for students with SEND supports better integration into society and has a positive impact on many other outcomes. However, others argue that some degree of specialist provision remains important, especially for students with higher needs. Some jurisdictions have tried to navigate this by offering forms of specialist provision within mainstream settings.

5. **What kind of training and support do educators need in order to support students with SEND?**

Teacher education and professional development offerings in SEND provision are rarely adequate, and insufficient workforce expertise can heighten demand for specialist provision. A thorough offer should combine:

- Initial teacher education and ongoing professional development, with both involving practice-based learning that builds knowledge, application of skills and professional attitudes rather than one-off courses.
- Mandatory universal training and specialist pathways.
- Condition-specific training (e.g. on autism) and broader ‘trans-diagnostic’ training.

6. **What structures will ensure students with SEND make positive post-school transitions?**

Planning, career guidance and support in advance of students leaving school may improve labour market participation and social integration. However, this requires adequate resourcing – for example, through transition coordinators and in-study or in-work support – as well as multi-agency planning and data-sharing.

7. **What is the best approach to engaging stakeholders in policymaking?**

Stakeholder involvement can be a source of valuable lived experience and build trust and legitimacy. It can also reduce the risk of unanticipated implementation problems. However, it can slow decision-making and privilege organised or vocal groups.

8. **What steps will be taken to overcome the silos between SEND policy and other areas of education and public policy?**

A balance of formal structures and processes, legal duties, and accountability processes, along with individuals who are willing to champion students with SEND and their families, is likely to be needed.

## Introduction

Special Educational Needs and Disabilities (SEND) policy is an area of growing concern around the world. Support systems are often in crisis due to a combination of rising identification rates, funding pressures, and insufficient workforce expertise.

This report examines SEND policy and outcomes across 14 jurisdictions.<sup>1</sup> The report recognises that jurisdictions describe children and young people with additional needs in many ways. Unless otherwise specified, “SEND” should therefore be understood here as an umbrella term that refers to a diverse range of concepts and terminologies which are used across systems.

Beyond the key takeaways and questions listed above, this report has the following sections:

1. Overarching findings
2. SEND policy aims and purposes
3. SEND policy structure
4. SEND policy development and evaluation
5. SEND policy in context
6. SEND outcomes

The report does not identify any single ‘best path’ for SEND policy. Instead, it sets out various policy options, along with contextual factors that need to be taken into account. The report primarily focuses on SEND policy in mainstream schools in the compulsory sector, but it also touches briefly on early-years and special-school policy. An explanation of the report’s methodology is provided in an appendix.

## Overarching findings

**SEND is a strong contender for being one of the most challenging areas in education policy and it has many features of so-called ‘wicked problems’.**

- SEND policy’s success is highly dependent on other areas of education policy such as curriculum, selection/tracking, accountability, and teacher training.
- SEND policy’s success is highly dependent on other areas of government policy, such as health.
- Siloes between government departments need to be broken down and multiple agencies coordinated in order for students with SEND to thrive.

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<sup>1</sup> England, Scotland, Northern Ireland, Wales, Ireland, France, the Netherlands, Finland, Estonia, Poland, Japan, Singapore, New Zealand and Ontario

- Resources are constrained in any education system and hence the identification of students with SEND and their needs is in tension with limited budget allocations.
- The needs of a vulnerable minority have to be prioritised and then balanced against pressure to design and fund a system that works at scale for the majority.
- There is a limited and contested evidence base regarding 'what works'. This is exacerbated by huge variation between individuals' needs, as well as competing views on what success would look like.
- Policy can butt up against entrenched social attitudes and a history of segregation and prejudice.

**This results in persistently poor outcomes across jurisdictions.**

- Although there are multiple approaches to managing a SEND system, none appear to be delivering consistently positive outcomes.
- Large gaps in academic attainment remain; many teachers report high levels of stress; and stakeholders often feel the system is not working well for them.
- While we should not overlook the progress that has been made since the days when students with SEND were systematically segregated and discriminated against, none of the reviewed jurisdictions believe they are fulfilling their ambitions.

**Despite widespread stated commitments to place students with SEND in mainstream classrooms, policy often struggles to reconcile these ambitions with ongoing requests for specialist provision, and the challenges of providing adequate support.**

- Article 24 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) expects governments to move towards mainstream placements at all levels, creating a clear formal direction of travel.<sup>2</sup>
- However, in many Western liberal democracies, parents and carers are demanding additional specialist provision – often motivated by concerns about inadequate support in mainstream classrooms and rising need, particularly since the Covid pandemic.
- These demands are reinforced by SEND Non-Governmental Organisations (NGOs) and parent and carer advocacy groups. Their influence is amplified by media coverage and avenues for legal recourse. This drives caution among policymakers. As one interviewee in Ireland put it, “if you push too strongly towards inclusion, you will run into political resistance and you are doomed to failure.”
- This tension may help explain the fact that an increasing proportion of students with SEND are being educated in non-mainstream classroom settings, flying in the face of policy intentions.

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<sup>2</sup> United Nations (2016) para. 39

### **Finite public budgets drive a need for funding prioritisation or ‘triage’.**

- Governments respond to financial pressures by setting thresholds for additional support and developing assessment mechanisms with evidence requirements.
- However, attempts to deliver on students’ rights to individualised support can drive up identification rates and costs.
- Assessment processes are themselves a frequent source of dissatisfaction and require co-ordination between different agencies and specialisms. This need for collaboration creates further challenges.
- Difficulties allocating scarce funding are manifested across systems, regardless of whether eligibility is needs-based or medicalised. Nonetheless, jurisdictions like Finland and Wales are attempting to recalibrate their ‘tiering’ systems and introducing broader, group-based entitlements.
  - In Wales, the 2021 reforms discontinued the “Schools Action” and “School Action Plus” routes for students requiring lower-level support. Instead, if a student is deemed not to require ‘Additional Learning Provision’ they are supported with ‘Universal Learning Provision’. This has resulted in reduced identification, but no reduction in costs.
  - Finland is replacing its “three tiers” model – from least to most intense student support – with a broader group-based entitlement to support for all students, while concentrating special support on a smaller cohort with more complex needs to balance inclusion with affordability. However, the outcomes of this move, including impact on costs, are still not yet clear.

**Culture, values, social attitudes and history can hinder or enable certain approaches to SEND policy.** These factors seem to be more important than political or governmental structures in shaping a jurisdiction’s policy approach.

- Educational systems that prioritise tracking and selection policies can make it challenging to fully include students with SEND. Possible reasons for this include the way such structures can direct resources ‘upwards’ to students without SEND who are more likely to be placed in selective classes and schools, and the negative effects on the self-concept of students with SEND if they are actively ‘grouped’ on the basis of attainment in standardised assessments.
- Societies with more established disability-activism movements can favour needs-based approaches to eligibility, as is the case in Scotland, New Zealand, Wales and Finland.
- However, even in societies with such movements, a degree of medicalisation often persists in statutory documentation and as a gatekeeper when seeking access to higher-cost provision. For example, England and Ontario retain diagnostic criteria for eligibility despite their rights-focused orientation.
- Soviet and communist legacies (in Poland and Estonia) may have limited the public’s openness to inclusion-focused policies, and collectivist values in Japan may contribute to hesitance regarding extensive individualised adjustments.

**Varying degrees of centralisation give rise to a tension between the benefits of local flexibility on the one hand, and consistency and equitable entitlement on the other.**

- In Finland, municipal and school-level autonomy allows provision to be tailored locally, but it also leads to uneven interpretation of national norms and variation in support, linked to local finances.
- Local discretion also appears to drive variability in provision in Ontario and New Zealand, as well as hampering coordination with other policy areas.
- In the Netherlands, school boards are not geographically bounded and can sit in multiple regional alliances. Large boards may belong to dozens of alliances with differing aims, funding regimes and reporting requirements, making coherent and equitable SEND delivery harder to secure.

## **SEND Policy aims and purposes**

**SEND policy typically aims to ensure schooling better meets the needs of students with SEND and prepares them for participation in society, both socially and economically.** Some jurisdictions enshrine these aims in policy documents and legislation.

- The stated goal for the schooling sector in Singapore’s Enabling Master Plan (EMP) 2030 is that “by 2030, children with disabilities will have access to an education that develops their potential and equips them with the knowledge and skills to participate meaningfully in society”.
- Ireland’s 2004 Education for Persons with Special Educational Needs (ESPEN) Act, which governs SEND provision, declares that one of its goals is for students to leave school “equipped with the skills to participate fully in society – socially and economically – according to their capacity”.

**SEND is increasingly seen in needs-based, rather than medical terms.**

This involves focusing on the support a student needs to access and progress in education, regardless of diagnosis.

- Finland, Ireland, Scotland and Wales use more needs-based conceptualisations.
- England, Estonia, New Zealand, Netherlands, Northern Ireland, Ontario, France and Singapore use a hybridised (partially medicalised, partially needs-based) conceptualisation to define need and allocate support.
- Japan and Poland have retained more medicalised conceptualisations of SEND that centre around diagnosed conditions or disabilities.
- Some jurisdictions with needs-based understandings of SEND have particularly expansive conceptualisations of the category. For example, in

Scotland, 'Additional Learning Needs' (ALN) includes groups like young carers and English learners.

**Table 1**

*Conceptualisations of SEND*

<b>Medicalised</b>	<b>Combined</b>	<b>Needs-based</b>
Japan	England	Finland
Poland	New Zealand	Ireland
	The Netherlands	Wales
	Northern Ireland	Scotland
	Ontario	Estonia
	Singapore	
	France	

**Hybrid approaches that combine needs-based and medical paradigms often persist for pragmatic reasons.** Limited funding for high-needs support often pushes systems back towards diagnoses as an important mechanism for controlling access.

**Aspirations within policy to educate more students with SEND in the mainstream are common but frequently contested.** Policymakers and researchers typically promote mainstream education for students with SEND, in-line with obligations under Article 24 of the UNCRPD. However, parents, carers and advocacy groups often advocate the retention – or expansion – of specialist provision. This may be because many mainstream schools still lack the capacity to adequately support students with SEND. This tension can result in compromises in which an increased policy orientation towards mainstreaming sits alongside continued or even growing specialist provision.

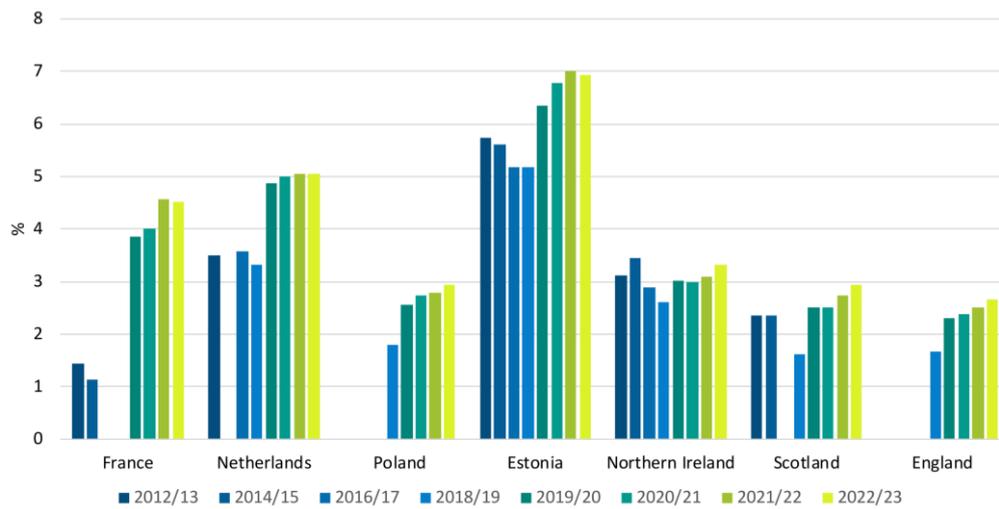
**This may help explain the growing share of students with an official SEND decision being educated mainly outside mainstream classrooms, including in special schools.**

- Increases in enrolment in non-mainstream settings can be seen in all countries for which data is available.<sup>3</sup> This is the case even though jurisdictions have different thresholds for students to enrol in non-mainstream settings. Even in Northern Ireland, Estonia and Scotland – which for a time showed a dip – the proportion of students educated in non-mainstream settings is now rising again.

<sup>3</sup> The European Agency for Special Needs and Inclusive Education (EASNIE) classifies students who do not attend mainstream groups or classes 80% or more of the time as being enrolled in “non-mainstream” or “non-inclusive” settings. These include students in separate classes in mainstream schools, fully separate special schools, non-formal education run by health or social services, or are out-of-school children/learners.

## Graph 1

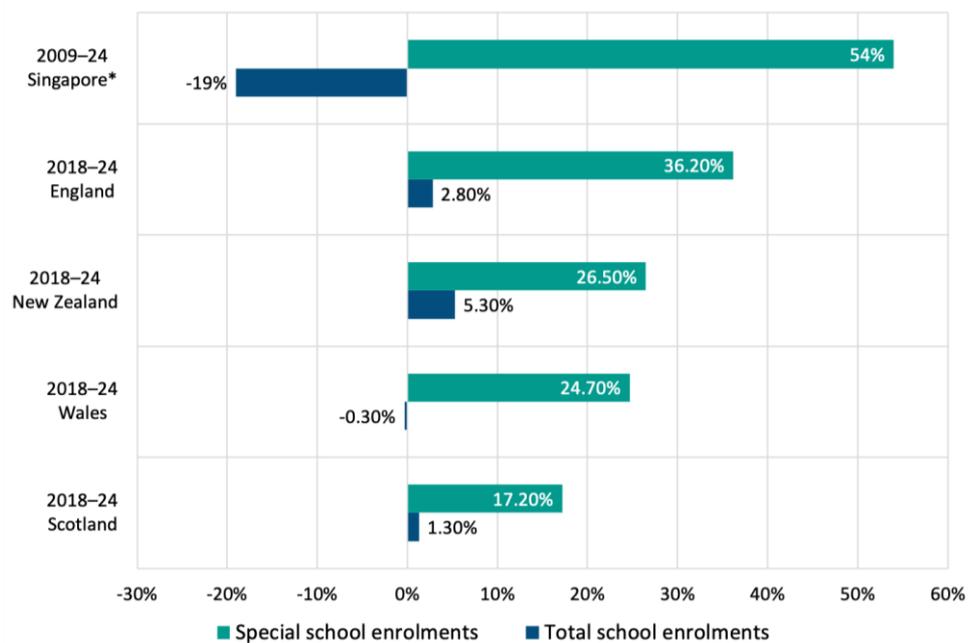
Students enrolled in non-mainstream education settings



- Although comparable data is not available for all jurisdictions, growth in special school enrolments has also vastly outstripped changes in the total student population in Wales, New Zealand and Singapore – suggesting a similar trend.

## Graph 2

Percentage change in special school enrolments from 2018-2024



<sup>4</sup> \* Singapore's data was only publicly available for 2009 and 2024. The larger change observed for Singapore should be interpreted in light of this longer time frame.

## SEND Policy Structure

Jurisdictions typically establish identification processes that triage students into different levels of need, so that resources can be allocated and provision organised to meet these needs. However, beneath this commonality, there are significant divergences in each of the seven core components of SEND policy.

Table 3

*The common components of SEND policy and their areas of divergence across jurisdictions*

Component of SEND policy	Area of divergence
<i>Identification thresholds</i>	<ul style="list-style-type: none"> <li>• Number of thresholds</li> <li>• How high a given threshold is</li> </ul>
<i>Assessment process</i>	<ul style="list-style-type: none"> <li>• Medicalised or needs-based approaches</li> <li>• Potential for issuing statutory plan based on assessment</li> </ul>
<i>Provision of Support</i>	<ul style="list-style-type: none"> <li>• Form of universal support</li> <li>• Degree of universal vs specialised support</li> </ul>
<i>Schooling structures</i>	<ul style="list-style-type: none"> <li>• Relative emphasis on mainstream vs special schools</li> </ul>
<i>Funding</i>	<ul style="list-style-type: none"> <li>• Census-based (cohort-derived) vs categorical (diagnosis-linked) funding</li> </ul>
<i>Training and professional development</i>	<ul style="list-style-type: none"> <li>• Compulsory vs optional modules</li> <li>• Prioritisation of whole-staff v specialist capability development</li> <li>• Condition specific training (for example on autism or dyslexia), and broader 'trans-diagnostic' training.</li> </ul>
<i>Post-school transitions</i>	<ul style="list-style-type: none"> <li>• Degree of formal coordination between schools and agencies</li> </ul>

### *Identification Thresholds*

**Systems differ in whether they use single or multiple thresholds for formal identification.**

Multiple thresholds can help tailor support and taper funding but may increase administrative complexity.

- Scotland has a broad Additional Learning Needs category covering over 40% of students, and then a higher threshold for Coordinated Support Plans, which are awarded to 0.4% of students with ALN (only 1,215 students).
- England combines a broad SEN Support category in mainstream schools with a less restrictive statutory threshold for Education, Health and Care Plans (EHCPs), which covered 5.3% of students in 2024/25.

Even where a single threshold is used, systems vary in how restrictive this is:

- Poland has one threshold, with around 5% of students being issued a formal statement of SEN.

- New Zealand sets its single national threshold for additional funding at a very high level, so only about 1% of students are eligible. However, schools receive a block of funding to provide support to students who sit below this threshold.

## *Assessment process*

**Systems differ in whether assessment is primarily diagnosis-led or needs-led.** More medicalised approaches link eligibility for support to clinical diagnoses, whereas needs-based approaches focus on what support a student requires to access and progress in education (regardless of whether they have a formal diagnosis). Researchers generally favour needs-based models, arguing they lead to quicker and better targeted support. However, formal diagnoses can be attractive to governments attempting to ration scarce resources and can potentially provide a more robust basis for claims for support.

Medicalised approaches do not necessarily imply a “higher” threshold, since diagnoses can be linked to relatively low-level conditions, and needs-based thresholds can still be high.

- As noted above, Scotland's highest category of support is needs based but only applies to a very small number of students.
- Poland's main category of support is medicalised but applies to approximately 5% of students.

**Assessment can lead to a statutory statement of entitlement, but some jurisdictions opt for a more flexible record of need.** Statements typically provide a statutory guarantee of support, whilst flexible records of need do not provide a statutory guarantee – or even a formal statement. Statutory plans can be popular with families who value the guarantee and predictability, but other approaches may be more responsive to need and more frequently updated.

- Assessment can result in a formal ‘statement of SEN’ or equivalent in England, Wales, Northern Ireland, Scotland, Ontario, Finland, Netherlands, France, Estonia and Poland.
- Needs are recorded in non-statutory documents in Ireland, Japan and New Zealand.

## *Support offers*

**The form ‘universal’ support takes varies widely between jurisdictions.** Universal support broadly refers to ‘baseline’ support that all students should be able to access, regardless of whether they have been officially assessed for SEND. Differences in the ‘universal offer’ mean that substantial adjustments are available without formal identification in some systems – while in others they are only triggered at later stages.

- In Finland, universal support includes direct intervention from a specialist teacher and curriculum adaptation by the classroom teacher, even before formal SEND identification.
- In Singapore, universal support is based on high-quality delivery of the national curriculum. Curriculum adaptation and specialist intervention only occur at higher 'tiers'.

**The balance between universal and specialist support is closely tied to where thresholds are set.** Specialist support refers to any support provided above the 'universal' offering, including things like intensive 1:1 interventions, provision of assistive technology, and access to additional therapies and treatments. The nature and extent of this support varied widely and is deeply tied to where 'thresholds' to access it are set.

- In systems with multiple thresholds like Finland, Wales and Scotland, students are more likely to access specialist support earlier, and in greater numbers, but for some students, support may not be as intensive as what is offered in systems with elevated, single thresholds such as Poland and New Zealand.
- In systems with relatively high thresholds for formal identification, specialist support is only provided to a smaller group of students and is typically harder to access. However, once it is secured, it may better match the level of intervention that some high-needs students require.

### *Schooling structures*

**Enrolment in non-mainstream settings is rising in many jurisdictions (as noted above).** Interviewees linked this to limited resources and a lack of teacher confidence or expertise within mainstream settings, as well as parental advocacy for special school places.

### *Funding approaches*

The allocation of SEND funding tends to be highly complex, with multiple different funding streams and formulae involved.

**Most systems combine census-based and categorical funding.** Census-based funding allocates money based on the total number of students (SEND and non-SEND) in a school or area, whereas categorical funding allocates money according to how many students have been identified as meeting a threshold.

**The balance between census-based and categorical funding shapes costs, incentives and targeting.** Census-based funding can potentially help to contain costs through economies of scale and by reducing incentives to seek formal identification. However, this may come at the expense of sufficiently targeted funding for higher-needs students. It can therefore be unpopular with parents and carers.

- England uses both forms of funding. It provides block grants to schools in the form of the 'notional SEND budget'. The exact way this grant is calculated varies between local authorities, but factors include total student numbers, alongside socio-economic status and the degree of low-prior-attainment in the school population. Additional categorical funding is then allocated on a per-student basis, based on the allocation of EHCPs.
- Some jurisdictions like Finland have moved more towards a census-based approach, with categorical funding for a relatively small group of students. However, it is not clear if this has resulted in absolute cost reductions.

### *Training and professional development*

**SEND training is a compulsory part of initial teacher education in some – but not all – jurisdictions.** Initial teacher training often includes modules on SEND but the content, depth and degree to which these are compulsory varies.

- In Singapore, all trainee teachers must complete compulsory modules covering foundational knowledge about SEN – typically around 36 hours of training.
- Poland requires all teachers to complete coursework on “working with learners with special educational needs”.
- Japan builds SEND exposure into teacher preparation and CPD across all education phases and supports clusters of schools to work together to enhance provision.

**Jurisdictions then use a variety of approaches to build SEND capability for teachers after initial training.** Most jurisdictions have national guidance for SEND for teachers to follow, and some provide for ongoing professional development. Additional, more intensive training is typically provided for staff in specialist roles. Examples of these approaches to building capability include:

- Scotland and Wales use national ASN/ALN frameworks to extend capability across the teaching workforce.
- In Finland, some universities offer a 'SEN teacher education track' which is a 5-year program with special education as the major subject. Graduates provide SEND support in mainstream schools.
- In England, the National Award for SEN Coordination is a mandatory postgraduate qualification for newly appointed Special Education Needs Coordinators (SENCOs).

**Despite these efforts, educators across jurisdictions feel underprepared.** They report that initial teacher education gives them a limited grounding in understanding disabilities or evidence-based strategies, and that they struggle to identify and support students' diverse needs.

## *Post-school transitions*

**The formalisation of support for post-school transitions varies.** In most systems, post-school support for students with SEND involves a mix of further education, work-focused options and community support, but only some jurisdictions place clear legal duties on schools and other agencies.

- Scotland's statutory Guidance on Additional Support for Learning requires education authorities to begin transition planning at least a year before a student is set to leave, to share information with partner agencies, and to coordinate across services.
- In Ontario, transition planning within the student's Individual Education Plan is mandatory from age 14.
- Ireland's New Directions model for Health Service Executive (HSE) provides funding for adult day services (community-based programmes for adults with disabilities) and features referral protocols to link schools and families with local day-service teams.

## **SEND policy development and evaluation**

**Policy making systems vary in their degree of centralisation.** In centralised systems, most policy decisions are made by an authority such as the Ministry of Education, whereas in decentralised systems more policy decisions are taken by bodies such as school districts or local authorities. Hybrid systems mix central direction with significant local discretion.

- In England and Singapore, central ministries design SEND policy and play a direct role in implementation.
- In Ontario, the Ministry sets high-level expectations, but school boards and their Special Education Advisory Committees shape local SEND policy.
- Scotland combines national legislation and guidance with Local Authorities that decide how policy operates in their area.

**Table 3**

*Jurisdictions' policymaking systems*

<b>Centralised systems</b>	<b>Hybrid Systems</b>	<b>Decentralised systems</b>
England Singapore Northern Ireland Ireland Estonia Poland	Scotland Wales Japan France New Zealand	Ontario Finland The Netherlands

**SEND policymaking is typically siloed from other policy domains.** Where there is integration, it tends to involve institutional structures that connect different government departments, such as formal meetings between sections of education departments or other departments, or plans for SEND that explicitly address intersections with other policy areas.

- In Singapore, the five-yearly Enabling Master Plan (EMP) sets a central strategic vision for disability policy that is then enacted by multiple government departments.
- In France, senior officials for inclusion were appointed across various ministries, and six interministerial disability committees were established to coordinate disability policy across government.

**Governments draw on policy advice from academics, NGOs, parents, carers and advisory groups.** However, the structures used to source this insight, and the extent to which these actors actually shape outcomes varies. For example, in some systems, stakeholders are embedded in formal decision-making, whereas in others they exert influence from the outside.

- Ontario's Special Education Advisory Committees are largely made up of NGO representatives. These have significant input into district board plans.
- England's Council for Disabled Children and its Special Educational Consortium routinely engage with the Minister to support policy design.
- In Ireland, NGOs such as Inclusion Ireland and AsIAM have driven high-profile media campaigns using public pressure and alliances with professional bodies to push Ministers to revisit policy.
- In Poland, Estonia, France and Japan, SEND policy is described as being influenced and driven by internal actors such as ministers, bureaucrats and official committees.

**A minority of jurisdictions use structured evaluation cycles for SEND but most rely on a mix of fixed one-off reviews and ad hoc evaluations.**

- Japan and Singapore review SEN policy roughly every five years to inform the next phase of development and delivery.
- Finland runs a four-year cycle set by the National Evaluation Council and implemented by the Finnish Education Evaluation Centre.
- All other jurisdictions adopt more ad hoc approaches.

**A variety of internal and external bodies conduct evaluations.** These include:

- Designated national bodies:
  - Ireland's National Council for Special Education
  - Japan's National Institute of Education
- Core civil service units and inspectorates:
  - France's Direction de l'évaluation

- Inspectorate-based evaluation functions in New Zealand, England, Estonia, the Netherlands and Ireland.
- Devolved bodies:
  - Ontario school boards
- Academics and external contractors:
  - Japan's cooperative councils – often with significant input from academics – conduct evaluations of SEND pilot projects.
  - External organisations like the OECD, and independent contractors in New Zealand, Scotland and Wales, have evaluated aspects of SEND policy.

## SEND Policy in context

**Systems with longer histories of inclusion and stronger disability-rights movements seem to find it easier to embed mainstreaming than those that have more recently emerged from systemic exclusion.** Parts of Eastern Europe and East Asia have had to work against very recent histories of exclusion, including residential institutions and segregated provision. This has acted as a barrier to inclusion. Other nations beyond East Asia and the former Soviet bloc have had more long-standing inclusion agendas, along with visible disability-rights advocacy groups. This seems to have laid the ground for widespread mainstreaming.

- Poland and Estonia have had to contend with Soviet policy legacies such as sending SEND students 'away'. This created a legacy of residential homes, separate curricula (mainstream versus simplified), and a system which was not set up to accommodate children and adults with SEND.
- In contrast, in Scotland, interviewees explained that international norms and rights agendas from the late 1980s steered Scotland toward inclusion as a societal goal, not just as a priority in education. This supported Scotland in framing SEND in broader social justice terms within the 2004 ASL Act.

**Early selection and tracking can be a barrier to 'full inclusion' policies.** Jurisdictions often aspire to 'full inclusion' policies, in which almost all students are educated within the mainstream. However, systems that rely heavily on early selection and tracking – for example, through selective schools, academic setting and streaming – can make it difficult to fully include students with SEND, particularly when pathways are based on narrow measures of attainment.

- France's education system is said to focus on identifying 'top performing' students and offering them additional resources.
- In Singapore, there is a historic legacy of seeking to maximise the nation's talent pool of high achievers through early high stakes testing and selection.
- In contrast, Wales is said to have a strong comprehensive ethos and a 'one system for all' orientation which supports inclusion.

**Limited public budgets constrain the scope and pace of reforms.** Budgetary pressures can be exacerbated by rising identification rates, increasing complexity of needs and political circumstances. For example, some UK Home Nations have faced specific fiscal challenges linked to their devolved status.

- Interviewees in Northern Ireland noted that limited revenue control and single year budgets have made long-term planning difficult.
- Wales lost specific European Union “convergence” funding after the UK voted to leave the European Union.<sup>5</sup> Interviewees noted that this further tightened budgets and made it challenging to fulfil Wales’ SEND equity agenda.

**Judicial proceedings and legal recourse can shape SEND policy and practice.** In some jurisdictions legal cases around identification and access are common, and there may be specially established tribunals that can review – and subsequently influence – government decisions.

- In Ireland, the O’Donoghue v Minister for Health (1993) legal case established that all children (including those with special education needs) are “educable” and have a constitutional right to free primary education appropriate to their needs. This compelled the state to provide it, and catalysed Ireland’s transition towards more inclusive education policies.
- In New Zealand, parents and carers successfully challenged aspects of the Special Education 2000 policy, thereby halting closures of some special schools – which also exemplifies the tension between aspirations towards mainstreaming, and resistance to this from some parents and carers.

## SEND outcomes

**Across a range of systems with differing policy approaches, students with SEND experience large and persistent gaps in attainment, attendance and progression.**

- Students with SEND score around 20-40 percentage points lower than their peers on core benchmarks (e.g. English, maths, GCSE thresholds) across all jurisdictions for which comparable data is available (England, Wales, Northern Ireland and Ontario). Gaps are visible from primary through secondary, and across subjects.
- Students with SEND are much more likely to be persistently absent: in England, those with EHCPs miss school at roughly twice the rate of their peers, in Northern Ireland close to three times, with Wales also showing a marked difference.

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<sup>5</sup> additional funding for skills and infrastructure projects because their GDP was less than 75% of EU average

- Gaps often widen at key transition points where dips in attainment and attendance are common for students with SEND in England, Scotland and Wales.
- On leaving school, students with SEND are more likely to move into supported or vocational pathways than higher education.

**There is significant variation in wellbeing and achievement within the SEND cohort.**

Academic outcomes for students with SEND differ by gender, disadvantage and region. Students in specialist or inclusive settings often report lower wellbeing than their mainstream peers within the same jurisdiction. Weaker belonging and higher anxiety also overlap with factors such as deprivation, rurality, ethnicity and language background.

- In Wales and Scotland, audit data links experiences within SEND groups to local deprivation.
- In Ontario and France, ethnicity and language differences within SEND groups appear in survey data.
- Students with SEND report lower wellbeing and school belonging than their peers in multiple systems (Wales, New Zealand, Ontario, France, Finland), and this often sits alongside weaker attendance and indicators of wellbeing.

**A lack of understanding of SEND among peers and staff, along with low expectations, drives poor provision and stigma, as well as hampering progression.**

Gaps in practitioners' knowledge and skills with regard to needs identification and inclusive practices are widely highlighted in academic studies. Studies also suggest that teacher expectations and negative perceptions of SEND may affect student participation, and lead to poor school experiences. Bullying and stigma are also common barriers to friendship and social acceptance.

- Parents and carers in England report that teachers' lack of understanding of their child's needs is one factor that undermines the quality of support they receive.
- Survey data from France and the Netherlands suggests that negative teacher attitudes or expectations may influence decisions about academic tracking.
- In contrast, Finnish students report that when teachers listen to students' perspectives and consider their strengths and interests, they feel more included.

**Commonly reported barriers to inclusion include performance-based metrics, exams and standardised curricula; limited time and resources; and class sizes.**

**Complex and inconsistent assessment pathways can block timely support.** Families across jurisdictions report that unclear rules, variable thresholds and inconsistent assessment processes delay identification and support, and many feel forced to seek costly private assessments to secure timely, appropriate interventions.

**Strong coordination between schools and external services can partially offset these barriers.** Where schools, health and social services work together in a coordinated way, this is consistently cited as helping pupils with SEND access support earlier and experience more positive, inclusive trajectories.

**SEND provision can also impact on teachers' psychological outcomes.** Data from Northern Ireland, the Netherlands and France, as well as wider OECD data, suggests that teacher stress and workload are higher in high-need settings.

## Appendix: Methodology

A more detailed methodology can be found in the full report.

### *Research Questions*

Six main research questions guided this study, along with sub questions which were refined through policy stakeholder workshops.

1. What is the purpose of SEND policy?
2. How are SEND systems structured?
3. How is SEND policy made and introduced?
4. How does research and evaluation shape SEND policy?
5. How does context shape SEND policy and reform?
6. What does the available evidence say about SEND outcomes?

### *Case Selection*

The project focused on fourteen jurisdictions: England, Scotland, Wales, Northern Ireland, the Republic of Ireland, Ontario, New Zealand, Singapore, Japan, Estonia, Finland, Poland, The Netherlands and France.

Jurisdictions were chosen based on diverse case selection nested within a similar domain. More specifically, jurisdictions were:

1. High or upper-middle income democracies which achieve near or above average results in PISA.
2. A combination of larger and smaller systems, as well as different political and cultural histories.

Additionally, jurisdictions that are of interest to CES' target audience of policy makers – primarily in the UK – were particularly prioritised. The final jurisdiction selection was agreed following consultation with policy stakeholders from across all four UK Home Nations.

### *Data sources*

There were five key data sources used to answer the above questions.

1. **Published summaries of SEND policy in each jurisdiction taken from Eurydice, EASNIE and UNESCO.** These are international organisations that work alongside national governments to compile reliable overviews of national education systems.
2. **Semi-structured interviews with 3 experts in each jurisdiction.** These were based on a structured sample made up of a senior government figure (either

minister or senior civil servant), an academic, and a policy influencer (e.g. NGO lead, think tank expert etc.). The target sample was achieved in all but two jurisdictions (Singapore & France). Interviews were recorded, transcribed and coded using a pre-determined framework based on the research questions.

3. **A rapid systematic literature review.** This gathered literature on the purposes and aims of SEND policy, how it is made and evaluated, and how it is shaped by context. 85 peer-reviewed academic sources were eventually included in the review.
4. **A review of SEND policy documentation and relevant websites.** Government websites, as well as materials from think tanks, NGOs, and reliable media outlets were used to supplement the analysis, particularly in relation to SEND outcomes.
5. **The findings of the ScopeSEND project.** This report is a joint output from CES and ScopeSEND and this report draws extensively on ScopeSEND's current public outputs.

### *Approach to analysis*

The first four sources were analysed via a framework synthesis. This involved combining relevant insights from each source to answer a series of research sub-questions in a single document. These answers were then synthesised to produce the findings outlined in this report, and in more detail in the full report.