



The Governance Delay Crisis

How delayed SEND support is driving higher costs, crisis intervention and financial instability in England

A public summary of

The Governance-Friction Cost Model in England's SEND System

Prepared by Every Child Matters, a project of ND SEND Consultants CIC

Executive Summary

This investigation examined whether rising SEND costs in England are being driven only by increasing numbers of children needing support — or whether delays inside the system are making the crisis significantly worse.

The evidence suggests that delay itself is now a major cost driver.

Across England, children are waiting longer for:

- assessments
- specialist provision
- therapies
- school placements
- transport
- implementation of EHCP support

The investigation found that these delays are strongly associated with:

- school breakdown
- mental health deterioration
- prolonged absence from education
- tribunal escalation
- crisis intervention
- higher transport costs
- more expensive placements later

The strongest relationship identified in the investigation was between statutory EHCP delay and escalation-linked expenditure:

Timeliness_Breach_Rate ↔ Delay_Cost_Index
r = 0.818



This was the strongest structural relationship identified anywhere in the national dataset.

The investigation identified:

- more than **£2.44bn** in directly observed escalation-linked SEND expenditure exposure
- widespread governance systems operating before support is implemented
- evidence of repeated review systems, panel routing and amendment pathways
- statistical evidence that governance-friction remained associated with higher costs even after controlling for demand and workforce variables

The findings suggest that:

delaying support does not reduce costs — it increases them.

What This Investigation Looked At

The investigation combined:

- EHCP timeliness data
- SEND expenditure data
- SEND transport expenditure
- Educational Psychology governance evidence
- panel governance evidence
- tribunal and dispute indicators
- local authority financial data
- statistical modelling across English local authorities

The investigation examined 2023–24 authority-level data and evidence from:

- 149 finance-safe authority rows
- 124 regression-matched authorities
- 158 Educational Psychology governance authorities
- over 1,200 testimony records from families

What “Governance-Friction” Means

The report uses the term “governance-friction” to describe systems that repeatedly delay, review, moderate or re-route decisions before support is implemented.

Examples include:

- repeated panel review
- additional approval layers



- delayed sign-off
- re-consultation processes
- amendment loops
- Educational Psychology QA review
- repeat annual review cycles
- commissioning review pathways
- delayed transport approval
- repeat evidence requests

The investigation does not claim that all governance is improper.

It does conclude that:

- these mechanisms operate at substantial scale
- they are associated with delay
- delay is strongly associated with higher downstream cost

The Escalation Cycle

The investigation identified a repeated national pattern.

1. Support Is Delayed

Children wait longer for:

- assessment
- provision
- specialist placement
- transport
- therapies
- implementation of EHCP support



2. Needs Escalate

Children increasingly experience:

- school breakdown
- attendance collapse
- anxiety
- mental health crisis
- exclusion risk
- family crisis
- out-of-school status



3. Costs Escalate

Local authority expenditure then rises through:

- independent placements
- specialist transport
- alternative provision
- tribunal expenditure
- emergency placements
- safeguarding intervention
- crisis mental health support



4. Financial Pressure Increases

Financial pressure then produces:

- tighter gatekeeping
- further review layers
- more moderation
- additional delay



5. The Cycle Repeats

The investigation found evidence consistent with a self-reinforcing escalation system.

The Key Statistical Findings

The strongest relationship

Relationship

Finding

Timeliness_Breach_Rate ↔ Delay_Cost_Index $r = 0.818$

This was the strongest structural relationship identified in the investigation.

The findings indicate that:



- authorities with higher delay levels also tended to have substantially higher escalation-linked expenditure

Governance-friction remained significant after controls

The investigation tested whether governance-friction still mattered after controlling for:

- EHCP numbers
- requests
- assessments
- Educational Psychology workforce capacity

It did.

The investigation found that governance-friction remained statistically significant even after those controls were applied.

This means the findings cannot easily be explained simply by:

- “more children”
- “more demand”
- “not enough EPs”

Educational Psychology Governance Findings

The investigation identified evidence of:

- QA review systems
- amendment requirements
- report return processes
- structured template controls
- repeat review pathways

The conservative modelling-safe rebuild identified:

- 55 authorities with explicit control evidence



- 76 authorities with structural or explicit control evidence

Additional findings included:

- 34 authorities with amendment evidence
- 25 authorities with report return or resubmission evidence
- 6 authorities with repeat review-cycle evidence

The report does not claim all QA systems are improper.

It does conclude that:

- these systems are capable of delaying statutory progression
- they form part of a wider governance-friction architecture

Transport Costs Are Much Higher Than Historic SEND Accounting Suggests

The investigation reconstructed TRUE SEND transport expenditure using:

- pre-16 transport
- 16–19 transport
- 19–25 transport

The findings showed that actual SEND transport expenditure frequently exceeded historic accounting assumptions.

Examples included:

- Thurrock \approx £10.4k per EHCP
- Norfolk \approx £6.4k
- Suffolk \approx £6.2k
- Cornwall \approx £6k

The investigation found that transport escalation is not peripheral.

It is one of the clearest downstream cost pathways linked to:

- delayed placement



- unsuitable placement
- delayed implementation

What Families Described

The investigation reviewed over 1,200 testimony records.

Families repeatedly described:

- prolonged delay
- repeated reviews
- provision instability
- educational breakdown
- mental health deterioration
- tribunal escalation
- inability to secure implementation of support

Examples included:

“These delays have caused our child to be out of education for a year now.”

“It took the LA a year to implement AP.”

“My child became significantly unwell, under the crisis team and we had to consider residential care due to a lack of support.”

“They then delayed engagement so then I'd end up losing the supplier.”

“Repeated procedural delays that escalated a manageable issue into a legal dispute.”

The report does not treat testimony alone as proof.

The significance is that:

- these themes repeatedly aligned with the statistical and governance findings elsewhere in the investigation.



What This Report Does NOT Claim

This report does not claim that:

- every local authority acts unlawfully in every case
- every delay is deliberate
- every governance process is improper
- every cost is avoidable
- statistical association alone proves intent
- statistical association alone proves individual legal causation

The report does conclude that:

- governance-friction mechanisms are visible at national scale
- delayed support is strongly associated with higher downstream cost
- governance-friction remained associated with escalation-linked expenditure after controls
- delaying support appears financially destabilising rather than financially protective

The Central Conclusion

The evidence suggests that England's SEND financial crisis is not explained by rising demand alone.

Instead, the investigation found evidence consistent with a wider system in which:

- support is delayed
- needs escalate
- crisis pathways increase
- costs rise later

The central finding of the investigation is:

Delayed statutory support appears strongly associated with higher downstream expenditure.

And:



Reforms which preserve or expand delay-producing governance systems may intensify — rather than reduce — long-term SEND financial instability.

Key Figures

Finding	Result
Strongest relationship identified	$r = 0.818$
Observed minimum escalation-linked exposure	£2.44bn
Authorities in finance-safe dataset	149
Authorities in regression-safe model	124
Authorities with explicit EP governance control evidence	55
Authorities with structural or explicit EP governance evidence	76
Testimony records reviewed	1,253

Final Note

This investigation is observational rather than experimental.

However, the evidence consistently pointed in the same direction across:

- financial modelling
- governance evidence
- statistical testing
- transport reconstruction
- authority-level comparisons
- family testimony

The findings suggest that:

Reducing delay may be one of the most important financial interventions available within England’s SEND system.