

# Response ID ANON-RFMC-FBR1-K

Submitted to **Residential Accommodation for 16-18 year olds: National Minimum Standards**

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## Introduction

### 1 What is your name?

**Name:**

Ruth Perry

### 2 What is your email address?

**Email address:**

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### 3 What is your organisation?

**Name of organisation:**

Natspec

## Residential Accommodation for 16-18 year olds: National Minimum Standards

### 4 Are the standards comprehensive and clear? If you have answered no, please explain your answer, with reference to the relevant Standard and paragraph numbers.

**Please answer Yes or No:**

No

**If you have answered no, please give us your views:**

The information on the applicability of these standards to independent specialist colleges provided in the sections 'About this document', 'Who this is for', and 'Under what circumstances these standards apply' is very unclear. Having sought clarification from the Department, I understand that only those colleges which are subject to Ofsted Care inspections under the Social Care Inspection Framework are in scope. While we appreciate the need for careful definition of which providers are in scope, it would be helpful to make a single clear statement about relevance of the standards for independent specialist colleges, which clarifies the link between being in scope for Ofsted Care inspections and the applicability of these standards.

Please refer to response to Question 6 for details of suggested amendments including some which would improve clarity of the standards.

### 5 Are the standards set at the right level, and are they appropriate for students in post-16 institutions? If you have answered no, please explain your answer, with reference to the relevant Standard and paragraph numbers.

**Please answer Yes or No:**

No

**If you have answered no, please give us your views:**

Although they are appropriate for the most part, in a small number of cases, there is some content which makes them inappropriate for (some) learners with learning difficulties and/or disabilities. See response to Q6 for details.

### 6 Are they suitable for the full range of colleges and 16-19 academies to which they apply?

**Please answer Yes or No:**

No

**Please give us your views:**

There is a small number of instances where the proposed standards may be not entirely relevant to independent specialist colleges, or difficult for them to apply as currently written.

2.2 Some independent specialist colleges are very small; in these settings it may be prove difficult to offer students a choice of staff to whom they can turn for personal guidance. We would prefer, "Each resident has at least one member of staff to whom they can turn for personal guidance or for help with a personal problem."

2.4 Students with more profound learning difficulties would not be capable of independently contacting an external helpline or the Office of the Children's Commissioner. To display this information in a setting catering solely for such students would be mere tokenism. We would prefer Standards 2.3 and 2.4 to be merged, with reference made to the fact that external contact numbers should be available wherever students are capable of using these.

5.1 We would like it to be made clear that the requirement for 'separate' sleeping accommodation for male and female students does not mean that male and female students need to be accommodated in separate residences. In independent specialist colleges, residences are not always single-sex. This may be due to the numbers of each sex on roll, particularly in a small setting, or because students require specific, specialist accommodation to meet their individual needs,

regardless of their sex. The emphasis should be on providing appropriate protection for students whatever the mix, gender or age, within each residence (this is more clearly expressed in 5.5).

7.2 In a small number of independent specialist colleges where students have complex physical disabilities, local fire services have advised that it is not in the students' best interests to take part in a night-time fire drill, where they may experience severe discomfort or there is potential risk of injury through being evacuated. They instead require staff to demonstrate that they are fully aware of the evacuation strategy and confident in their ability to implement it in an actual fire/emergency situation. It would be helpful if the standards could reflect this advice, perhaps through the addition of a phrase such as 'except in very exceptional circumstances where local fire services have advised that this would not be appropriate given the nature of the students involved'.

**7 Do you think that any of our proposals could have a disproportionate impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics' (including disability, gender, race and religion or belief)? Please provide evidence to support your response.**

**Please answer Yes or No:**

Yes

**Please give us your views:**

See response to Question 6 for a small number of instances where the standards may not be meaningful for students with learning difficulties and/or disabilities.

**8 Do you have any other comments on the standards?**

**Please answer Yes or No:**

Yes

**If you have other comments, please give us your views:**

Please note that this is an organisational response from Natspec.

**9 Would you like us to keep your responses confidential?**

No

**Reason for confidentiality:**