

# Stopping movement of staff between care settings

## Natspec response to DHS consultation

23 November 2020



### Introduction

Natspec is the membership association for organisations which offer specialist further education (FE) for students with learning difficulties and disabilities. We represent 99 specialist colleges across England and Wales, and we also offer training for the wider further education sector to help improve the quality of provision in all FE providers. Our vision is that all young people with learning difficulties or disabilities can access high quality education and training, which meets their individual needs and supports their aspirations for skills, work and life. A significant proportion of our members offer residential placements; of these, a number operate registered care homes to accommodate their students.

### The case for exempting care homes providing accommodation for students in residential specialist colleges

While we welcome the government's intention to make care homes as safe an environment as possible, we believe that the proposed requirement to restrict staff movement requirement will not be beneficial in the context of care homes which provide accommodation for students in residential specialist colleges. We would like to see this type of care home excluded from the proposed requirement. Residential specialist college care homes are quite distinct from other types of provision.

- For many young people in a residential college, the care home is the equivalent of a university hall of residence for their non-disabled peers. It provides them with term-time accommodation, while they return to the family home during the holidays.
- Students generally leave the care home in the morning to spend their day in college or on work placement and only return in the late afternoon, meaning that there is no need for the care homes to be staffed for the bulk of the day.
- Unlike other care home residents who have been confined to their care homes throughout the pandemic, students in residential specialist colleges have continued to attend their place of learning – in line with DfE guidance - so that they can continue to access the provision as set out in their Education, Health and Care Plans.
- Many residential specialist colleges operate multiple small care homes, often co-located on the college site.

### Continuity of care

Residential specialist colleges need to be able to share staff across their own care homes. While all of our colleges have taken steps to minimise staff movement between care homes, there is a continuing need to allow this to happen under certain circumstances. In particular, colleges need to be able to move their own staff between care homes in response to staff shortages. Continuity of care from trained



staff who know the students well is a very important element of specialist college provision. Students in our colleges may, for example, display behaviours that challenge; use non-conventional, non-verbal communication; use highly specialised equipment, including assistive technology; or suffer from severe anxiety exacerbated by change. They need to be supported by familiar staff who understand their individual needs. While colleges are making judicious use of agency staff, most have minimised use as part of their infection control protocols; they also need to ensure a significant majority of staff on duty at any time are their own staff, appropriately trained to support, and with a detailed knowledge of, their young people. The proposed requirement for a 14-day self-isolation period for agency staff transferring between settings would so reduce their availability as to make it impossible to rely on them in any case.

## Safe running of care homes

Given the shift patterns required of some care staff working in residential colleges (where the care home is effectively closed for the majority of the day), staff sometimes need to find work in a different setting to make up full time hours. For some, as you would expect of care professionals, this additional employment will be in a second care setting. Working in two highly regulated environments where strict adherence to infection controls is required, staff are being tested weekly and type IIR masks are being worn at all times is preferable to bringing in staff who work part-time at a supermarket, for example.

We would support staff employed in residential specialist college care homes being able to work in other settings, provided they adhere rigorously to existing infection control guidelines. We are concerned that if part-time staff are forced into selecting a single setting, colleges may be left with insufficient staff to run their care homes safely. Given the level of expertise and training needed to work with young people with complex needs, including complex autism, mental health needs, medical needs, and profound and multiple learning difficulties, recruiting suitable replacement staff in a timely fashion would be impossible.

## Impact of stopping moving of staff between care homes

The impact of a college having to close one or more care homes because safe staff levels cannot be maintained would be enormous for the young people concerned. Not only would they be facing a huge disruption to their living arrangements, they would also lose access to their education. Most students come to a residential specialist college because it has the specialist staff from a range of disciplines and the specialist facilities required to meet their needs - needs which cannot be met in a mainstream college. These young people cannot simply pick up their education elsewhere. The significant minority of students in residential specialist colleges who are on 52-week placements would be most severely affected by the closure of their care home, as for them a return to 'the family home' is impossible. For the colleges, losing students would result in a level of lost income that would threaten the existence of some.