

The Association of National Specialist Colleges

Natspec www.natspec.org.uk



Inspection of residential provision for students under eighteen years of age in further education colleges

A response from the Association of National Specialist Colleges: Natspec

Natspec is the membership association for independent specialist colleges and currently represents all YPLA funded colleges and a further 10 FE units or sixth forms in special schools.

The 3,800 full time students with learning difficulties or disabilities at Natspec colleges have a wide range of ambitions and aspirations, just like their peers. Colleges use their specialism and inter-disciplinary expertise to provide personalised learning and hands-on experience which enables students to achieve their goals, develop greater independence and improve their life chances.

Most Natspec member colleges offer residential provision, but because of the complex needs of the young people, which usually includes personal care support, these colleges are usually registered with the CQC. However a small number of colleges have some or all of their residential provision inspected under the social care framework. This is because these learners do not require personal care as part of their programme, and includes provision for some learners with sensory impairments, and with Asperger's syndrome.

Natspec welcomes the opportunity to respond to this consultation. Our comments relate primarily to independent specialist colleges, but we do comment on other broader issues pertaining to vulnerable adults, in particular in response to Q4.

Q1. To what extent do you agree or disagree with our proposal to judge overall effectiveness in residential inspections?

We welcome the approach of a more focussed inspection against the four key judgments with an overall effectiveness judgment based on these and broadly agree with this proposal.

We are not sure that the criteria for inspecting schools necessarily reflect the focus of residential provision in a further education setting, which is more adult in ethos

and expectation and where there will also be older learners. For young people in ISCs, residential provision is integral to their learning programme and its purpose is to increase their level of personal autonomy and independence. Learners will be challenged and given every opportunity to maximise the benefits of the residential setting, within a secure and safe environment. We therefore hope that this will be taken into account by inspectors looking at provision in ISCs and in other parts of the further education sector.

We would also hope that inspectors would have some experience of learners with a range of learning difficulties and/or disabilities. This is particularly important when it comes to seeking the views of learners who may have specific communication needs, such as the availability of signers or the need for questions to be asked in specific ways in order to make sense to them. The importance of accessible approaches to gathering learners' views applies to all subsequent questions below when learners' views are being sought.

Q2. To what extent do you agree or disagree with our proposal to judge outcomes for young people in residential inspections?

We broadly agree with this proposal.

In ISCs, the residential experience is an important element of the extended curriculum and there are likely to be specific learning goals that relate to the residential setting, such as those linked to independent living skills. Initial assessment will lead to the setting of individual targets and progress towards these goals will be monitored and recorded. Other broader learning goals around communication and personal and social skills will also link to the residential experience but will not be specific to it; it gives learners the opportunity to practise many of their broader skills in a realistic setting. Inspectors must understand that for many learners in ISCs progress towards these goals will often be fairly slow and may not be evident if the inspection takes place quite soon after learners begin their course. In addition, the total learning experience at the college will contribute to progress, not just the residential setting, so some caution will need to be applied to these judgements. We understand that this learning focus in the residential setting may not be the same in all other colleges that are inspected under this framework.

In terms of behaviour, colleges will have behaviour plans in place where necessary and these will have to be taken into account when making judgements about students' behaviour, as in some instances this could be an important reason for the placement.

We particularly welcome the judgments on enjoyment and wellbeing, as these are an important element of the experience. We also know that as adults, good health is of particular importance to those with learning difficulties and disabilities and that the

residential setting can do a great deal to promote healthy behaviour.

With regard to transition, this is a crucial element of the programme but it must be borne in mind that colleges can only prepare young people for the next step. It is not in their gift to guarantee employment, an independent living place or a place in further education or training. However, we believe that it is possible to make judgements about the support for transition and the liaison that takes place with future placements.

Q3. To what extent do you agree or disagree with our proposal to judge the quality of service in residential inspections?

We broadly agree with this proposal. We agree that all these aspects of provision are important.

However, we would like inspectors to be aware that since the split of BIS and DfE, no capital, maintenance or minor works money has been available to ISCs and consequently colleges have had to find their own resources for improving accommodation within the confines of a funding system that makes this extremely difficult. At the same time, we would also point out that the quality of learning experience does not depend on the quality of the buildings.

We agree that young people will wish to keep in touch with their families and friends, although this is not always easy if students have communication difficulties. ISCs therefore use a wide range of technology to facilitate this contact.

Q4. To what extent do you agree or disagree with our proposal to judge safeguarding in residential inspections?

We strongly agree with this proposal, safeguarding must be a priority in residential settings. We agree that colleges must have good procedures and regular staff training in place. However, we also believe that colleges must have a pro-active approach to safety and enable learners to begin to take some responsibility for themselves, an approach which must be underpinned by good risk assessment. For example, Natspec and ISCs have undertaken a good deal of work around e-safety in the residential setting, to ensure that rather than close down opportunities to learners - not a realistic option in the days of mobile technology - we teach young people how to be safe and responsible users of technology.

We have another point to make which applies to all aspects of this consultation, but perhaps most importantly to this section on safeguarding. We are aware that there are some young people with learning difficulties and/or disabilities aged 18+ in different types of residential setting whose provision is not inspected under this or

any other framework. This includes a few young people in ISCs which are not registered with CQC and where only residential provision for those under 18 is inspected. The same applies to some land based and other further education settings where there is accommodation for young adults 18+ with learning difficulties and/or disabilities that is not subject to CQC registration. We would therefore propose that this social care inspection framework is extended to include these potentially vulnerable young adults and we believe that the proposed judgments would apply equally to this group, with the caveats noted elsewhere.

Q5. To what extent do you agree or disagree with our proposal to judge leadership and management in residential inspections?

We agree with this proposal. It is essential that leadership and management contribute to the effective and safe organisation of the residential provision but also to the quality of the whole residential experience and its links to the learning programme.

Q6. To what extent do you agree or disagree with our proposal to judge equality and diversity in residential inspections?

We agree with the proposal to inspect equality and diversity as part of all other aspects of inspection.

Q7. To what extent do you agree or disagree with our proposal to use the college's own self-assessment?

We agree with this approach. It is likely that ISCs will choose to include their assessment of residential provision within their main SAR, as this will reflect the importance of the extended curriculum.

Q8. To what extent do you agree or disagree with our proposal to reduce the notice that we give to colleges of an inspection to two to three weeks for coordinated inspections?

We agree with this proposal in those limited instances where it applies. Two to three weeks is sufficient notice.

We agree that the stand alone report should be continued. However, we note the intention to 'provide clearer information to the readers of our inspection reports, particularly learners, parents and carers'. At present, these reports are not included

with other reports about the college, but in a separate section of the website. We do not think this is helpful as readers may not be aware of the existence of such reports. We would therefore recommend that all reports about a particular provider are listed under one main entry for that provider.

Q9. To what extent do you agree or disagree with our proposal to give no notice to colleges for standalone residential inspections?

We have some concerns about this, because it means that these colleges will be treated on a different basis to those colleges that have co-ordinated inspections.

We also have concerns that relevant staff may not be present, that students will not be available to speak to inspectors if they have other activities planned, or there may be difficulties in ensuring that they have appropriate support (e.g. signing) in order to speak to them.

Q10. To what extent do you agree or disagree that we should conduct a monitoring visit between inspections where there are serious concerns about the provision, and that this visit should be unannounced?

We agree that there should be monitoring visits for colleges judged to be inadequate, although we assume that if the concerns had been of an extremely serious nature regarding the immediate safety of young people, instant action would have been taken.

Although we can understand the thinking behind making these unannounced visits, the caveats above also apply in this instance. In particular, we hope that these visits would be undertaken in the spirit of helping the college to make sustainable improvements, not to 'catch them out'. However, we do not have a problem with such visits being on a much reduced notice period of a few days.

Q11. To what extent do you agree or disagree that we should produce a letter for learners/residential learners after the inspection?

We agree that learners should be aware of the judgments being made, but would want to ensure that the letters are written in a format which makes it fully accessible to all the learners in the college, who might have a wide range of literacy skills, as well as other access requirements.

For further information, please contact:

Alison Boulton
Chief executive, Natspec

c/o Derwen College
Oswestry
Shropshire
SY11 3JA

chiefexecutive@natspec.org.uk
0117 9232830