

Inspection of Residential Holiday schemes for disabled children

Response by the National Deaf Children's Society

Background

The National Deaf Children's Society (NDCS) is the national charity dedicated to creating a world without barriers for deaf children and young people. We represent the interests and campaign for the rights of all deaf children and young people from birth until they reach independence to ensure that the barriers that deafness can pose are removed to allow deaf children and young people the chance to develop their full potential.

Summary response

NDCS has for a number of years operated a programme of activities for deaf children and young people including residential holiday schemes at a range of locations throughout the UK and often many of these events are oversubscribed.

NDCS are fully supportive of the need to register and inspect residential holiday schemes for disabled children however we are concerned that the proposed inspection framework as outlined in this consultation does not take account of the circumstances specific to national providers of holiday schemes such as NDCS. We therefore feel that the proposed criteria should be amended to clearly reflect this as this could adversely affect the judgement given to national providers and the consequences this may have for the services they provide.

Below we list those descriptors from the proposed criteria which we feel could adversely affect the judgment given to national providers of residential holiday schemes for disabled children such as NDCS. We then outline the reasons for this. Following this we include our formal response to the consultation.

The overall experience for disabled children.

In the *Outstanding* criteria:

“Staff and volunteers have well-established and effective partnerships with key agencies such as local health professionals, social work services and local community facilities, in order to improve the experiences of all children and young people.”

How well children and young people are helped and protected

In the *Good* criteria:

“Rigorous and proactive safeguarding practice by staff reduces the risk of harm or actual harm and it accords appropriately with statutory guidance. This must include regular, effective contact and planning with parents or carers and local authorities as required.”

Working in partnership to improve the outcomes for children and young people

In the *Good* criteria;

“The scheme works proactively with the local community such as neighbours, faith groups, leisure organisations and local businesses to support children and young people to use the facilities and to develop a sense of belonging, security and purpose.”

These criteria appear to assume that the provider operates holidays from one location. However, national organisations may operate short holidays in a number of locations throughout England. For, example the National Deaf Children’s Society may operate 10 short schemes in different locations in England to ensure they are locally accessible to deaf children throughout the country. The following year it may move to other locations to improve accessibility in other parts of the country.

Achieving these criteria descriptors would be very difficult for NDCS for the following reasons:

- NDCS do not own or operate specific activity establishments.
- We may only run one activity in one area per year and may not return there or that that specific venue or indeed locality again - thereby making it difficult to establish links with local organisations and stakeholders as the regulations appear to require.
- The low incidence of deafness among populations and the specific activity of an event may also mean that one residential scheme in one locality may not be attended by many of the local population of deaf children and young people with some deaf children may have travelled some distance from a number of different localities to attend.
- We operate a priority places scheme which seeks to include more vulnerable deaf young people who would benefit from attending a scheme but who would struggle for various

reasons to attend. Such young people are often referred via statutory agencies such as social care and mental health. We therefore have strong links with many services throughout the UK but the scheme that is chosen as suitable for a young person to attend may not be in the area where those links with key stakeholders have been established.

- Staff and volunteers are recruited for each activity and therefore they will unlikely to have established the *effective partnerships* required within the regulations. Also given the skills required to deliver the programmes staff may be recruited from outside the locality in which the event will take place in.

NDCS can demonstrate partnership work with professionals and parents but the context is different from an organisation providing holidays in one location. It is largely through our other national and regional services and activities that NDCS has established close links with local statutory and non-statutory agencies which aim to promote the inclusion of deaf children and young people from various backgrounds access mainstream services groups. This includes:

- Local deaf children's groups.
We have strong links with our local network of disabled children's groups whose members include deaf children and families who are drawn from diverse communities who themselves have strong links within other groups in their localities. We listen to these groups and try to accommodate the various local factors relevant to their areas when planning activities.
- Working with BME communities
We have projects which work with various BME communities to encourage BME families of deaf children to access and use our services. We use community interpreters when required and visit various groups and establishments such as schools and community centres to inform families about what we do also and run deliver appropriately tailored services such as our NDCS parenting a deaf child course.
- Me2 project
This encourages mainstream sport and leisure groups and societies make their provision deaf friendly to enable deaf children and young people to access them.
- The NEED (NDCS Engage, Enable and Deliver) project.
This is pilot project in the North West region which aims to see if there are better ways NDCS can work with existing providers of services to ensure deaf children and young people and their families can access their services and meet their needs.

All the above are examples of established programmes that dovetail into the residential activities programme and must be considered when the residential programmes are being inspected.

It is questionable whether the statutory agencies and local community organisations will be prepared to devote as much time to establishing effective links with NDCS as they do with local providers who operate holiday schemes from one location.

Question 1: The overall experience for disabled children.

We neither agree nor disagree.

Please add any comments to our proposals

This is an essential standard but we disagree with descriptor below which we feel is not appropriate to the context in which national organisations provide schemes.

In the *Outstanding* criteria:

“Staff and volunteers have well-established and effective partnerships with key agencies such as local health professionals, social work services and local community facilities, in order to improve the experiences of all children and young people.”

NDCS would welcome representatives from the LSCBs and local education, social care, health and police services to visit our schemes. However, for reasons set out above it is doubtful whether local statutory and non statutory organisations will be able to be prepared to commit the time to establishing links with national organisations that may run just one scheme in their area anything between once a year and once every 3+ years

In addition staff and volunteers who run NDCS holiday schemes are recruited and trained nationally to work specifically with deaf children. Unless by chance they happen to be living in the locality where the scheme is being run they are likely to be recruited from outside the area and will not have been able to have established the partnerships which are suggested in this descriptor.

We would suggest that this descriptor should be re-worded to state:

“...Staff and volunteers have well-established and effective partnerships with key agencies as appropriate....”

This will give inspectors the discretion to:

- distinguish between those organisations providing schemes in just one location, where establishing local links are appropriate, from national charities running short schemes in a number of locations to ensure the schemes are accessible to their beneficiary group
- explore other relevant partnerships (eg the arrangements we have with a number of local authorities to refer deaf young people who are socially vulnerable social services departments) .

Question 2: How well children and young people are helped and protected

We neither agree nor disagree.

Please add any comments to our proposals

This is crucial standard which is supported but we disagree with one of the descriptors. Whilst we agree with the majority of descriptors within this category we are concerned the descriptor outlined below is not appropriate to the context in which national organisations provide schemes.

In the *Good* criteria:

“Rigorous and proactive safeguarding practice by staff reduces the risk of harm or actual harm and it accords appropriately with statutory guidance. This must include regular, effective contact and planning with parents or carers and local authorities as required.”

We would suggest that this descriptor should be re-worded to state:

“...This must include effective contact and planning with parents or carers as required and local authorities as appropriate.”

Such a change will give inspectors the discretion to look at all relevant partnerships and not necessarily just those in the area in which a scheme operates

Question 3: The effectiveness of leaders and managers

We agree.

Please add any comments to our proposals

We note that in the descriptor for *Outstanding* it includes:

“...Relationships between the residential holiday scheme and parents, carers and partner agencies ensure the best possible care, experiences and futures for children and young people.”

We agree with the wording of this descriptor which does not state that *partner agencies* must be local to those schemes and is therefore flexible enough to recognise the delivery of schemes which NDCS operate.

Question 4: Working in partnership to improve the outcomes for children and young people

We disagree.

Please add any comments to our proposals

We agree partnerships are an important standard but disagree with the wording of one descriptors

In the *Good* criteria it states:

“The scheme works proactively with the local community such as neighbours, faith groups, leisure organisations and local businesses to support children and young people to use the facilities and to develop a sense of belonging, security and purpose.”

We suggest changing this descriptor to give inspectors the discretion to consider relevant partnerships and not just those locally that may be less relevant for some schemes.

Question 5 and 6: Judgement of ‘inadequate’.

We neither agree nor disagree

Please add any comments to our proposals

Given our response to the previous questions we would be very concerned if a judgment of ‘inadequate’ was made without considering the context and delivery of schemes such as those run by NDCS which have established links with many stakeholders throughout the UK and which adhere to all statutory safeguarding requirements in the operation of our activities. Not to do so could adversely affect the judgement given to schemes run by national providers and the consequences this may have for the services they provide.

Question 7: online questionnaires

We agree with this proposal

Please add any comments to our proposals

We welcome any further developments by Ofsted to seek the wishes and feelings of children and young people and their parents/carers. However we would urge that the questionnaires developed aim to be accessible to children and young people who may require alternative modes of communication and levels of reading abilities. This could include the use of maketon, PECS or video translation into British sign language.

The proposals outlined would require providers to distribute these materials. If these are not in an accessible format the burden will be placed on providers such as ourselves to adapt existing methods of feedback which we already seek from children and young people and parents and carers.

Question 8: Further comments

During the undertaking of any inspections we would expect that all measures should be taken to appropriately establish the wishes and feeling of disabled children and young people. Some deaf children and young people's first language is British Sign Language and therefore we would expect OSFTED to make the necessary arrangements to use nationally registered BSL interpreters and not staff from within schemes so that those deaf children and young people are able to meaningfully be consulted by inspectors and therefore aid the evaluation process.