

MINIMUM STANDARDS FOR SUPPORTED LODGINGS FOR YOUNG ADULTS (AGED 16 – 21) IN NORTHERN IRELAND

Analysis of Consultation Responses

March 2016

LIST OF CONSULTATION RESPONSES ON STANDARDS FOR SUPPORTED LODGINGS FOR YOUNG ADULTS (AGED 16-21) IN NORTHERN IRELAND
1. NI Ombudsman
2. Youth Justice Agency
3. Voice of Young People in Care (VOYPIC) includes (11 young people)
Belfast Health and Social Care Trust
5. Barnardos
6. Regulation, Quality and Improvement Authority (RQIA)
7. Northern Ireland Association for the Care and Resettlement of Offenders
(NIACRO)
8. South Eastern Health and Social Care Trust
Southern Health and Social Care Trust
10. Northern Health and Social Care Trust
11. Action for Children
12. Police Service for Northern Ireland (PSNI)
13. Include Youth
14. Disability Action
15. The Children's Law Centre (CLC)
16.Northern Ireland Human Rights Commission (NIHRC)
17. Council for the Homeless NI (CHNI) (32 young people)*
18. Health and Social Care Board
19. Western Health and Social Care Trust

- * Includes young people from the following projects and locations
 - First Housing Francis Street and Jefferson Court (L'Derry)
 - Praxis, Northlands Road (L'Derry)
 - MACS Supported Accommodation Services (Belfast/Downpatrick and Newry)
 - Simon Community Mount Street Mews (Coleraine)
 - Simon Community 242 Antrim Road (Belfast)
 - Flax Foyer (Belfast)
 - Simon Community Foyer (Belfast)
 - Stay Supported Lodgings Scheme, Southern HSCT (Armagh, Portadown and Newry)

Consultation on Standards for Supported Lodgings for Young Adults (aged 16-21) in Northern Ireland

Background

The development of a continuum of supported living options to assist young people's transition from mainstream care placements as they journey into adulthood is recognised as an essential element of the services available. Supported Lodgings are part of the continuum and offer an integrated care and housing support model that is in keeping with the needs of young people leaving care, as a step-down from a core care setting or young people presenting as homeless.

The Standards have been developed in consultation with the HSCB, HSC Trusts, NIHE, Regulation and Quality Improvement Authority (RQIA), Council for the Homeless NI, Voice of Young People in Care (VOYPIC and Fostering Network.

The consultation of the draft standards ran from 14 November 2014 to 30 January 2015.

Overview of Consultation Responses

A total of 19 responses were received; 18 from organisations and 1 from an individual. Included in the responses from organisations were the views of 43 young people; 8 young people were living in foster care or kinship care and the remainder were living independently or in a variety of supported accommodation arrangements.

A summary of the responses received to the questions asked by the Department is set out below. It should be noted that not every respondent chose to answer every question as set. Percentages shown in the summary are based on the actual number of responses received to each individual question.

Of the 19 respondents, 8 chose not to address the specific questions posed and submitted their response in a narrative form. Where respondents have clearly stated their agreement or disagreement to particular questions, these have been included in the analysis.

Throughout the consultation responses the needs of children and young people with disabilities were raised. Not all high need/high risk young adults can be placed in supported accommodation as it may not be suitable for their needs: some young adults need an individual bespoke package of accommodation, support and supervision. Additional needs for young adults with a disability will be incorporated into the wider assessment and should inform the overall intervention and support pathway. This has been reflected in the introduction to the Standards.

A number of respondents also raised issues of an operational nature. These have been shared with the Agency Provider for Supported Lodgings and with the STAY project and where applicable will be incorporated in good practice.

Q1. Is the structure and layout of the draft standards clear and easy to understand?

Yes: 74% No: 0% Unknown: 26%

<u>All</u> of the respondents who answered this question agreed that the standards were clear and concise.

Issues raised include:

Issue: A statement offering a range of accessible formats should be placed at the beginning of the main consultation document and in any future documents for ease of reference.

Departmental Response

R1. A statement to this effect has been included in the standards document and will also be brought to the attention of the DHSSPS Equality Unit for future consultations.

Standard 1 – Provision of Information – The Supported Lodgings Service has an up to date statement of purpose and function. Young people and referral agencies have all the information they need to help them make decisions about using the service. Potential Hosts have the information they need to decide if providing a service is appropriate for them

Q2. Do you agree with the content of the Standard Statement?

Yes: 68% No: 0% Unknown: 32%

<u>All</u> of the respondents who answered this question agreed with the content of the Standard Statement.

Issues raised include:

Issue: Young people should have a personal 'secure' storage facility.

<u>Departmental Response</u>

R1. Standard 7 – Accommodation – Criteria 4 has been amended to include the provision of 'secure' storage for the young person.

Q3. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 63% No: 5% Unknown: 32%

The majority of respondents who answered this question agreed that the criteria for the standard provided sufficient clarity on actions required to meet the standard.

Issues raised include:

Issue: The 'young person' should be included in Criteria 2 in relation to information sharing arrangements.

Departmental Response

R1. Standard 2 – Criteria 2 has been amended to include the 'young person' in information sharing arrangements.

Q4. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 63% No: 5% Unknown: 32%

The majority of respondents who answered this question agreed that the evidence clearly sets out what is required to demonstrate effective delivery of the standard.

<u>Issues raised include</u>:

Issue: The Statement of Purpose (SoP) is reviewed annually by the HSC Trust in partnership with the service provider and other key stakeholders and forwarded to RQIA by the HSC Trust.

Departmental Response

R1. Standard 1- Criteria 1 has been amended accordingly to reflect partnership in producing the Statement of Purpose.

Standard 2 – Service Referral, Assessment and Placement of Young People – The initial referral and assessment processes will be undertaken in an open and inclusive way with young people, referrers, Hosts and other agencies. The placement of a young person is based on an assessment of need and risk which will inform the placement match.

Q5. Do you agree with the content of the Standard Statement?

Yes: 58% No: 16% Unknown: 26%

The majority of respondents who answered this question agreed with the content of the Standard Statement.

Issues raised include:

Issue 1: Suggestion that Standard Statement should be reworded to include the viability of progressing a placement and subsequent match.

Issue 2: More detail on providing advice/advocacy to young people.

<u>Departmental Response</u>

R1. Standard Statement amended as suggested.

R2. Standard 2 -Criteria 5 has been amended to reflect the advocacy role of the Lead Worker

Q6. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 42% No: 16% Unknown: 42%

Issues raised include:

Issue 1: Access to an independent advocate

Issue 2: Criteria 2 – young people should be included in information sharing arrangements and there should be forthright sharing of clear and relevant information with young person.

Issue 3: Evidence point 3 should state that young people will have access to case records of referral, assessment and matching to reflect young person's involvement in the process.

Departmental Response

- R1. Criteria 5 has been amended to reflect the advocacy role of the Lead Worker.
- R2. Criteria 2 has been amended as suggested.
- R3. Evidence point 3 amended as suggested.

Q7. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 58% No: 0% Unknown: 42%

<u>All</u> of the respondents who answered this question agreed with the evidence set out to demonstrate delivery against the standard.

No issues were raised.

Standard 3 – Placement Agreement and Support Planning – All young people using the Supported Lodgings Service have a Placement Agreement and an individual Placement Support Plan appropriate to meeting assessed needs and to promoting the transition to adulthood.

Q8. Do you agree with the content of the Standard Statement?

Yes: 63% No: 5% Unknown: 32%

The majority of respondents who answered this question agreed with the content of the Standard Statement.

Issues raised include:

Issue: Standard statement should reference transition to independent living.

Departmental Response

R1. Not all young people go to independent living arrangements as some will return home to their parents. No amendment necessary.

Q9. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 37% No: 21% Unknown: 42%

Issues raised include:

Issue 1: Criteria 5 – an emergency risk assessment and risk management plan are clearly specified.

Issue 2: Criteria 5 - Include reference to when the social work visit should take place for example within x working days.

Issue 3: Criteria 5 - Placement Support plan to be agreed before placement at point of referral.

Issue 4: Criteria 5 - To be finalised within 5 working days with Host provider referral agency and service provider

Issue 5: Criteria 7 – the word 'resolve' is added to strengthen criteria – 'and to address/resolve any concerns about the young person's placement'

Departmental Response

- R1. Criteria 5 amended to take account of the issues raised above.
- **R2**. Criteria 7 amended accordingly.

Q10. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 53% No: 10% Unknown: 37%

The majority of respondents who answered this question agreed with the evidence set out to demonstrate delivery against the standard.

Issues raised include:

Issue: Ensure leisure activities are open to young people with disabilities.

<u>Departmental Response</u>

R1. If applicable to the young person's needs and the capacity of the Host to meet these needs, this will be reflected in the Placement Support Plan. Standard 3 – Evidence point 7 (2) amended to reflect that the Placement Support Plan should include the responsibilities of the Host, Lead Worker and Service Provider.

Standard 4 – Ending or leaving the Placement – There is robust planning in place to support a young person's move from a Supported Lodgings placement.

Q11. Do you agree with the content of the Standard Statement?

Yes: 63% No: 0% Unknown: 37%

<u>All</u> of the respondents who answered this question agreed with the content of the Standard Statement.

No issues were raised.

Q12. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 47% No: 11% Unknown: 42%

Issues raised include:

Issue 1: Criteria 1- an exit plan should be in place at the start of the placement and monitored throughout

Issue 2: Criteria 1- suggest 'signposting' be changed to 'linking with'

Issue 3: Criteria 1- all planning for those approaching 18 years of age should be in line with leaving and after care arrangements under the Children Order and should complement rather than be seen as an alternative

Issue 4: Criteria 2 – Suggest wording of criteria is changed to show that contingency arrangements are agreed in advance

Issue 5: Criteria 3- Department to give sufficient weight to views of young person regarding failed placements for future planning of the service

Issue 6: Criteria 3 - Ongoing monitoring of the service in line with Section 75 of the NI Act 1998.

Departmental Response

R1: Criteria 1 amended to reflect views expressed.

R2: Criteria 2 amended to reflect views expressed

R3: Criteria 3 Evidence point 5 requires that the service can demonstrate how end of placement interviews have been used to inform service development.

R4: Criteria 3 Evidence point 6 reflects quarterly monitoring of the service by the Service Provider and has been amended to include Service Commissioners.

Q13. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 53% No: 5% Unknown: 42%

The majority of respondents who answered this question agreed with the evidence set out to demonstrate delivery against the standard.

<u>Issues raised include:</u>

Issue 1: An exit plan should be in place at the start of the placement and monitored throughout. Young person should be appropriately supported though this transition. Records should detail the destination of young people who exit the scheme.

Issue 2: Data on planned/unplanned moves and corresponding outcomes should be shared with service commissioners.

Departmental Response

R1: Evidence point 1 and 4 amended accordingly to reflect the issues raised.

R2: Evidence point 6 amended to reflect views expressed.

Standard 5 – Safeguarding Young People – Arrangements are in place to safeguard young people and help them understand how to protect themselves from harm

Q14. Do you agree with the content of the Standard Statement?

Yes: 68% No: 0% Unknown: 32%

<u>All</u> of the respondents who answered this question agreed with the content of the Standard Statement.

No issues were raised.

Q15. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 47% No: 11% Unknown: 42%

Issues raised include:

Issue 1: Criteria 3 – Suggest wording of criteria is changed to include 'staff and hosts'.

Issue 2: Criteria 6 – Hosts to disclose to the provider any close associates and non-residing relatives who have been subject to a conviction or suspicion of a scheduled offence who in turn may come in contact with the young person whilst in the placement.

Departmental Response

R1: Criteria 3 amended as suggested

R2: Criteria 6 amended to reflect Access NI checks of non family members. Evidence point 7 amended to reflect disclosure to the service provider of any reasons why a close associate or non-residing relative may be unsuitable to have regular contact with children.

Q16. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 53% No: 10% Unknown: 37%

The majority of respondents who answered this question agreed that the evidence clearly sets out what is required to demonstrate effective delivery against the standard.

<u>Issues raised include:</u>

Issue 1: Evidence point 2 - Suggest wording is changed to reflect that Hosts and staff attend training specific to Child Protection and Child Sexual Exploitation.

Issue 2: Definitions of appropriate and acceptable personal behaviour should be provided and referenced.

Issue 3: Young people should be involved in developing and reviewing safeguarding training that Hosts receive. Joint training with Hosts, service providers and young people suggested.

Departmental Response

R1: Evidence point 2 amended accordingly.

R2: Included in young person's guide.

R3: Covered by Criteria 4 Standard 8. Service Provider to determine how training will be delivered.

Standard 6 – Engagement, Participation and Involvement – The young person's rights, wishes, views and feelings are sought, understood and taken into account in important decisions that affect their placement. The young person is encouraged to participate in reviewing, evaluating and improving the Supported Lodgings Service.

Q17. Do you agree with the content of the Standard Statement?

Yes: 68% No: 0% Unknown: 32%

<u>All</u> of the respondents who answered this question agreed with the content of the Standard Statement.

<u>Issues raised include:</u>

Issue 1: Young people should have the 'biggest voice' and complaint procedures should be clear and easily accessible.

Departmental Response

R1: Already covered in Criteria 3.

Q18. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 58% No: 5% Unknown: 37%

The majority of respondents who answered this question agreed that the criteria for the standard provided sufficient clarity on actions required to meet the standard.

<u>Issues raised include</u>:

Issue 1: Criteria 2 – The sharing of relevant information with the young people involved in the engagement and participation process should be included in the criterion.

Issue 2: Young people should be involved and in control of their own decision making.

Issue 3: A more comprehensive participation strategy should be in place across the DHSSPS.

Issue 4: The standard criteria must include the ability of the young person to refuse to participate in the supported lodgings scheme to opt for a type of accommodation they feel best meets their needs.

<u>Departmental Response</u>

R1: Included in Evidence point 3

R2: Already covered in Criteria 2.

R3: There are existing mechanisms for seeking the views of young people across DHSSPS.

R4: Supported Lodgings placements will not be imposed on young people and will only be made with their agreement

Q19. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 68% No: 0% Unknown: 32%

<u>All</u> of the respondents who answered this question agreed that the list of evidence clearly set out what is required to demonstrate effective delivery against the standard.

<u>Issues raised include</u>:

Issue 1: Capacity building for young people with disabilities to enable them to fully participate

Issue 2: Records should indicate when the young person's view and wishes have not been taken into account and the reasons for this.

Departmental Response

R1: This is covered in evidence point 2. Staff should be trained in meaningful engagement, participation and involvement with young people.

R2: Views and wishes of young people will always be taken into account; covered in evidence points 3 and 5.

Standard 7 – Accommodation – The accommodation is suitable, accessible, well maintained and provides for the young person's privacy as well as affording the opportunity to experience a family environment. The accommodation is compliant with Health and Safety Legislation and Fire Regulations.

Q20. Do you agree with the content of the Standard Statement?

Yes: 63% No: 0% Unknown: 37%

<u>All</u> of the respondents who answered this question agreed with the content of the Standard Statement.

<u>Issues raised include</u>:

Issue 1: The terms 'families' and 'familial environment' in describing supported lodgings provision are broadened and defined

Issue 2: Adequate standard of living to include food - important with regard to the young person's religious, ethical, cultural beliefs or their health needs

Issue 3: Improved options to stay close to family and friends and access to college or school

Issue 4: Placement checks should be 6 monthly rather than annually.

Issue 5: Slight rewording of standard statement to include word 'safe' before 'suitable' and include 'safeguarding' instead of 'safety' in last sentence

Departmental Response

R1: Standards Introduction amended to reflect familial and domestic living environment that affords age and developmentally appropriate experiences of preparation for adult life.

R2: Matching policy issues – see evidence point 2 Standard 8.

R3: As for 2 above

R4: Annual checks are considered sufficient

R5: Standard Statement amended to include the word 'safe'. 'Safety' considered appropriate in last sentence

Q21. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 47% No: 11% Unknown: 42%

Almost half of respondents who answered this question agreed that the criteria for the standard provided sufficient clarity on actions required to meet the standard.

Issues raised include:

Issue 1: Criteria 2 – should be amended to include fostering Health & Safety checklist.

Issue 2: Health and Safety Standard should correspond to normal domestic standards and not be beyond reach of ordinary families.

Issue 3: Criteria 4 – include personal 'secure' storage

Departmental Response

R1: Criteria 2 amended to reflect that the accommodation meets relevant Health & Safety Standards

R2: As above

R3: Criteria 4 amended

Q22. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 42% No: 16% Unknown: 42%

<u>Issues raised include:</u>

Issue 1: Visits should be undertaken every 6 months for the first 18 months and then annually if there are no issues arising.

Issue 2: Evidence should include 'BAAF Pet Assessment' for any pet at the placement.

Issue 3: Environment where young people with disabilities feel comfortable supported and comfortable to speak about their disabilities.

Departmental Response

R1: Amendment not considered necessary as evidence point 3 relates to checks on the accommodation and not support/contact with young person or host

R2: Evidence point 3 amended to include 'pet assessment'

R3: Noted. All young people should feel comfortable to speak about any issues.

Standard 8 – Hosts – A range of suitable Hosts are in place who have the necessary knowledge, skills and training and who are supported to provide appropriate placements for young people.

Q23. Do you agree with the content of the Standard Statement?

Yes: 63% No: 0% Unknown: 37%

<u>All</u> of the respondents who answered this question agreed with the content of the Standard Statement.

<u>Issues raised include</u>:

Issue 1: Hosts to be given information on what training and support they will receive.

Departmental Response

R1: Information Pack for Hosts at **Annex E** of Standard document amended to reflect Host mandatory training programme and schedule.

Q24. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 58% No: 5% Unknown: 37%

The majority of respondents who answered this question agreed that the corresponding criteria provided sufficient clarity on actions required to meet the standard.

Issues raised include:

Issue 1: Criteria 4 – Suggested rewording of criteria to include training on children and adults at risk or in need of protection.

Issue 2: The Service Provider ensures arrangements have been made with Host for meeting public legal liabilities as a result of a supported lodgings placement.

Issue 3: Hosts undergo an annual review that includes feedback from HSC Trust.

Issue 4: Will there be a mechanism or detail in relation to the expectation to attend the training?

Departmental Response

R1: Criteria 4 amended.

R2: Criteria 10 amended

R3: Criteria 3 and evidence point 3 amended to reflect that an annual review of approval arrangements are in place to ensure continued suitability of Hosts and take account of any change of circumstances.

R4: Criteria 4 – Information on mandatory training will be included in Information Pack for Hosts (**Annex E**).

Q25. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 58% No: 5% Unknown: 37%

The majority of respondents who answered this question agreed that the list of evidence clearly sets out what is required to effectively deliver against the standard.

Issues raised include:

Issue 1: Evidence point 2 – amend to include 'needs and risks'

Departmental Response

R1: Evidence point 2 amended.

Standard 9 – Staffing – Suitably qualified and skilled staff and managers are employed to ensure that Hosts and their families are adequately supported in meeting the needs of young people

Q26. Do you agree with the content of the Standard Statement?

Yes: 68% No: 0% Unknown: 32%

All of the respondents who answered this question agreed with the content of the Standard Statement.

No specific issues were raised.

Q27. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 58% No: 5% Unknown: 37%

The majority of respondents who answered this question agreed that the corresponding criteria provided sufficient clarity on actions required to meet the standard.

Issues raised include:

Issue 1: Criteria 3 – Amend to read 'All staff undergo induction training which includes child protection, sexual exploitation, mental health awareness and vulnerable adults safeguarding'

Departmental Response

R1: Criteria 3 amended to read 'All staff undergo induction training relating to children and adults at risk or in need of protection. This includes safeguarding and protection, sexual exploitation and mental health awareness'.

Q28. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 63% No: 0% Unknown: 37%

All of the respondents who answered this question agreed that the list of evidence clearly sets out what is required to effectively deliver against the standard.

Issues raised include:

Issue 1: All staff working with young people and Hosts should have access to support in accordance with their needs.

Departmental Response

R1: This is already covered in Criteria 4 - Staff training needs are regularly analysed and appropriate training planned and delivered.

Standard 10 – Management and Governance Arrangements – Management arrangements and systems are in place that assures the Supported Lodgings service is delivered to a high standard and is underpinned by a clear accountability and governance framework.

Q29. Do you agree with the content of the Standard Statement?

Yes: 68% No: 0% Unknown: 32%

All of the respondents who answered this question agreed with the content of the Standard Statement

Issues raised include:

Issue1: Examination of written records to be an important part of inspection process. In addition face to face interviews with young people are also a vital component of any inspection

Departmental Response

R1: This issue is covered as part of RQIA inspection methodology. Face to face interviews conducted as part of validation visit.

Q30. Do the corresponding criteria for the standard provide sufficient clarity on actions required to meet the standard?

Yes: 58% No: 5% Unknown: 37%

The majority of respondents who answered this question agreed that the corresponding criteria provided sufficient clarity on actions required to meet the standard.

Issues raised include:

Issue 1: There should be criteria for the monitoring and analysis of outcomes for young people leaving the service.

Issue 2: Criteria 1 – All policies and procedures must be up to date and reviewed annually.

Departmental Response

R1: Already covered under Criteria 4.R2: Covered throughout the Standards

Q31. Does the list of evidence clearly set out what is required to demonstrate effective delivery against the standard?

Yes: 53% No: 10% Unknown: 37%

The majority of respondents who answered this question agreed that the list of evidence clearly sets out what is required to effectively deliver against the standard.

Issues raised include:

Issue 1: Evidence point 1 should specifically mention: A Supervision Policy; an Administrative and Recording Policy; an Untoward Event Notification Policy and Pro Forma

Departmental Response

R1: Annex G – Policy, Procedures and Guidance added to standards document.

<u>Generic</u>

Q32. Do the draft standards comprehensively address the core requirements of Supported Lodgings and adequately identify their purpose and function as distinct from mainstream children care placement options?

Yes: 58% No: 0% Unknown: 42%

All of the respondents who answered this question indicated that they agreed that the draft standards comprehensively addressed the core requirements of Supported Lodgings and adequately identified their purpose and function as distinct from mainstream children care placement options.

<u>Issues raised include</u>:

Issue 1: None of the young people spoken to, by Include Youth, identified as willing to use the service instead preferring a children's home, hostel or more independent living options. They did recognise that some young people would find the service useful. It was suggested that the reluctance of some and their queries are worth considering when preparing information packs for young people.

Issue 2: Supported lodgings should be delivered in a manner that does not seek to replicate existing care placement arrangements, and that, conditions of placement and expectations of stakeholders are in keeping with the age and stage of young people being placed. A placement should be commensurate with young people's needs. It is important to note that supported lodgings is designed to deliver low to medium support and is not intended for young people with high complex needs.

Departmental Response

R1: This type of accommodation is already in place in Southern Health and Social Care Trust and known as the STAY project. It is recognised and accepted by NIHE and HSC that supported lodgings is not a panacea for all young people: the introduction of supported lodgings is intended to afford young people with a housing need with the choice and option of a familial/domestic type living environment. The development of information packs for young people to underpin these standards, are being informed by young people themselves and include matters relating to roles, responsibilities, expectations etc. We accept that it may not suit all young people leaving care.

R2: The standards emphasise the necessity of assessed need, of placement planning, of matching etc to take account of the capacity of the host and the needs of the young person to ensure that placements are appropriate and commensurate with the statement of purpose and function of the service. We agree that this is part of the matching process and training of Hosts will be key to its success.

Q33. Are there additional issues which should be included or areas which should be elaborated on further within the draft Standards?

Yes: 26% No: 32% Unknown: 42%

Just over a quarter of respondents stated that additional issues should be included or elaborated on.

Departmental Response

Most of the comments/issues raised in this question about the introduction, background, underpinning values and principles, equality and diversity, choice and the appendices have been implemented or a decision taken that further explanation was not necessary.

A particular issue raised in the <u>Background</u> related to clarification being provided about which agency has primary responsibility for young adults and in what circumstances, particularly those who are 18-21 and non care experienced.

Departmental Response:

R1: This will be worked out as part of operational arrangements. The Standards require that any young person placed over 18 years where there is no Social Services involvement requires a named lead worker; designation of the named lead worker will be the responsibility of the placing agency.

Equality

Q34. Are the actions/proposals set out in this consultation document likely to have an adverse impact on any of the nine equality groups identified under Section 75 of the Northern Ireland Act 1998?

Yes: 21% No: 37% Unknown: 42%

Issues raised include:

Issue 1: CLC wishes the Department to consider all of the Section 75 categories in a more comprehensive screening exercise.

Issue 2: CLC request in future DHSSPS desists from using and relying on preliminary screening in order to make decisions about whether EQIA of policy proposals is necessary.

Issue3: CLC would be grateful for details of how the Department has or intends to consult directly with children and young people as part of this process to date.

Issue 4: The standards need to maintain an informed perspective on the risk young people with criminal convictions present.

Departmental Response

R1: Issues raised have been brought to the attention of the Department's Equality and Human Rights Unit. Having considered the comments from consultees, the equality screening template has been revisited however, given that this is a new scheme and uptake is unknown, an equality impact assessment would be difficult at this time. We do not consider that a full equality impact assessment is necessary for now, however we will monitor this as part of the 2 year pilot and will reconsider the equality screening document as part of the pilot evaluation process.

R2: As above

R3: As part of the consultation process a young person's version of the standards document was produced and was used by Voice of Young People in Care (VOYPIC) to facilitate workshops with 11 young people; 7 were living in foster care, 1 in kinship care and 3 were living independently. In addition a further 32 young people were consulted directly by the Council for the Homeless NI (CHNI). The consultation involved young people from projects and locations listed on page 2 of this analysis.

R4: The standards emphasise that placement is based on assessed needs and risks and the capability and capacity of the Host to meet these needs.

Q35. Are you aware of any indication or evidence – qualitative or quantitative that the actions/proposals set out in this consultation document may have an adverse impact on equality of opportunity or on good relations?

Q36. Is there an opportunity to better promote equality of opportunity or good relations?

Q37. Are there any aspects of the draft standards where potential human rights violations may occur?

Yes: 5% No: 53% Unknown: 42%

No specific issues were raised under these questions.

Q38. Please add any other relevant comments not covered in the questions above.

Yes: 63% No: 37%

Departmental Response

The majority of general comments/suggestions made under this question have been addressed in the body of the Standards. Others of an operational nature will be incorporated in good practice where applicable.

The Department would like to thank all of the participants in the consultation for their time and assistance.