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Dear Mr Mullan

Consultation on Standards for Young Adults Supported Accommodation Projects

We welcome the development of the draft standards for young adults supported accommodation projects and the opportunity to provide comment on these. Our brief remarks do not focus on the operational detail of the draft standards but on the overarching framework they are contained within. A number of our comments echo those made in our response to the Draft Regional Standards for Leaving Care Services consultation submitted in July 2009.

NICCY welcomes the recognition of the need to have in place a continuum of provision available to meet the particular needs of young people aged 16 and 17 years old and vulnerable young adults from the age of 18 years. We draw attention to the Department's duty to ensure that strong governance and quality assurance arrangements are in place for this provision in order to fulfil its corporate parenting responsibilities to support this group of young people in the transition to adulthood.

We have previously raised concerns about the lack of regulation and quality of supported accommodated provision and are therefore pleased at the introduction of these draft minimum standards, below which 'no provider is expected to operate'. It is however, important to recognise that the standards represent the minimum operational baseline for providers who should be encouraged and supported to develop practice well beyond these prescribed minimum standards.

We trust that the Department has involved young people as well as providers in the development and piloting of these minimum standards and that young people will



continue to play an active role in monitoring and reviewing the effectiveness and appropriateness of the standards.

It is positive that the minimum standards will provide the benchmark for inspection and regulation of young adults supported accommodation by the Regulation and Quality Improvement Authority. It will be important to ensure coherence between these and the Quality Assessment Framework standards, particularly to prevent the development of two frameworks with differential and competing sets of standards.

We welcome the articulation of core values which underpin the minimum standards and the inclusion of 'rights' as one of these. However, we recommend that in discussing rights the term 'young people's rights' rather than their 'human and individual rights' is used and that the document pays regard to the 'the recognised rights of children and young people' rather than the 'recognised rights of children and young people as citizens'. This is to ensure that clear and appropriate language is used when discussing children's rights, for example, the term 'citizens' may exclude those who are subject to immigration and asylum processes while the United Nations Convention on the Rights of the Child requires government to protect and uphold the rights of all children and young people within its jurisdiction.

We would welcome the underpinning values being more clearly articulated within the quality themes and standards criteria. For instance, the value of 'rights' being evidenced through criteria that young people have been made aware of their rights and staff have received training on children's rights. Another example of this would be ensuring the values of 'safeguarding' and 'partnership' have greater visibility through criteria such as, young people being actively involved in their individual risk assessment plans and providers demonstrating that the involvement of PSNI in incidents is a proportionate and appropriate response.

Please do not hesitate to contact me if you would like any further information.

Yours sincerely,



Alex Tennant

Head of Policy and Research