

Our comments upon the proposed new standards are based on a consultation process with our members, the 11 Camphill communities of Scotland.

Camphill supports more than 500 people with learning disabilities and other support needs. About two thirds of that number live in communities, with the others working there during the day in a variety of workshops and social enterprises.

To prepare our response we held a consultation workshop in Aberdeen in September 2016 to explore the human rights principles that underpin the new standards. We then composed a more detailed response that was circulated in draft form to the membership. As a result of the responses received we have arrived at the following contribution.

As will be evident below, Camphill Scotland welcomes the overall approach contained in the new standards.

We would welcome further opportunities to be involved in their development and, in particular, to assist with the development of the new methodology that will accompany them.

Our 3 main points are:

1. We welcome the new standards because they:

- a) Simplify current arrangements by replacing the 23 sets of standards for different types of registered care setting produced in 2002 with one set of standards for all health and social care settings.
- b) Enable a person's entire 'care journey' including health care to be mapped out in the same document, thereby allowing a more strategic and 'joined-up' view of health and social care to emerge. This should support whole system approaches to improvement rather than just individual services.
- c) Are written from the point of view of the individual and not the 'care system' and thereby help ground the standards in individual's concrete lived experience. This helps people who use services to know what they have the right to expect and when they are not being treated as they should be.
- d) Sit well with the Camphill emphasis on social pedagogy that also revolves around the unique lived experience of each individual

2. We think there are too many of them.

For example, there are fifty separate statements to support ‘*Standard 1 ‘I experience high quality care and support that is right for me’*’. If the number of standards is excessive, this may lead individual inspectors to stress some more than others and thereby produce an uneven implementation of the standards. Some statements seem vulnerable to subjective interpretation, such as the nature of a ‘suitably presented meal’ (S 1.30). Finally, having a very lengthy list of standards runs the risk of over-specification at a time when public bodies are rightly attempting to focus on market facilitation rather than control.

3. As they currently stand the new standards appear to see the individual primarily as a consumer of care.

The fundamental purpose of a Camphill community is to engage in the co-creation of a community of equals. To reduce it to a series of transactions between producers and consumers of ‘care’ empties it of this central and inspiring purpose. We are therefore occasionally uncomfortable with the individualistic focus of the standards. This could be addressed by having a standard that enshrined the individual’s right to participate in shared social, cultural and community life. We believe this would fit well with the human rights perspective underpinning the new standards while maintaining the emphasis on individual experience as the touch stone of good quality care and support.

Our four secondary points

1. A Whole System Approach

It is vital that a whole system approach is taken to ensuring people with learning disabilities and other support needs are included, are treated with dignity and respect, experience compassion (giving and receiving), and are provided with responsive care and support. Indeed, the overall quality of a person’s experience is determined by the interrelationship of agencies and individuals within a local and national political and economic context. It is vital that this context is borne in mind at all times so service providers are not unfairly expected to carry responsibilities for any failings at a systemic level.

2. Attending to local variation and limitations of context

We would wish to have some reassurance that Inspectors would use the standards in context, taking into account the specific environment and the needs of the people within the service. For example, internet access may be challenging in certain locations. Standard 2.14 is a positive addition to the list but needs to be balanced with our responsibility to appropriately safeguard vulnerable adults.

3. The individual's right to choose where they live

Standard 5.12 rightly highlights the importance of a person's family and social network. We agree that close access to loved ones is extremely important to a person's mental and emotional health. At the same time, for a whole host of reasons, people may nevertheless choose to live some distance away. There should also be a standard that says *'I am able to choose the service that is best for me even if it is some distance from my current home'*.

4. Implementation Issues

As stated above, we believe the lived experience of people who live and work in our communities is the best indicator of their quality of life. It is therefore very welcome that Standard 4 *'I am confident in the organisation providing my care and support'* is composed of statements from the individual's point of view. The ultimate test of leadership and management of a Camphill community is the experience of those who live and work there. We welcome an inspection approach that is outcome focussed, rather than process-focussed as this allows variety and innovation.

We anticipate, however, that an outcomes approach, particularly in Standard 4, may demand some disciplined implementation. The danger is that inspectors may seek to compensate for the lack of process statements with their own (perhaps unconscious) judgements about what sort of processes lead to the best outcomes. This may lead to an uneven and opaque inspection process.

As stated above, Camphill Scotland would welcome any opportunity to assist in the development of an appropriate methodology to accompany the new standards.