



**Draft Policy Position on Accommodation-based Care  
and Support for Adults with Learning Disabilities and/or  
Autistic Adults**

**Feedback from Survey and Poll: conducted 8 November  
- 17 December 2021**

**Date of report: 5 January 2022**

## Introduction

We developed a draft Policy Position on Accommodation-based Care and Support for Adults with Learning Disabilities and/or Autistic Adults. The purpose of this document is to deliver a formal policy position in relation to registration, and variation of existing conditions, for services for adults with learning disabilities and/or autistic adults where support is linked to accommodation.

We wanted everyone with an interest in accommodation-based care and support for adults with learning disabilities and/or autistic adults to have the opportunity to share their views with us on the draft guidance. The document was available for consultation between 8 November and 17 December 2021. The closing deadline was extended twice (from 2 December 2021), due to requests from interested parties who had not had the opportunity to respond. Providers and members of the public were made aware of the consultation through the Care Inspectorate provider update, our website, and through social media.

Respondents could let us know their views, on our Citizen Lab platform, by completing the survey and/or the poll. We received 40 responses to the survey and/or the poll, and an additional 5 responses were received via email from external partners such as Scottish Government; The Scottish Commission for People with Learning Disabilities; Social Work Scotland; the Housing Support Enabling Unit (part of the Coalition of Care and Support Providers in Scotland); and one Health and Social Care Partnership area. The responses were largely positive, and we got a lot of detailed, constructive feedback too. This report summarises the results of that feedback.

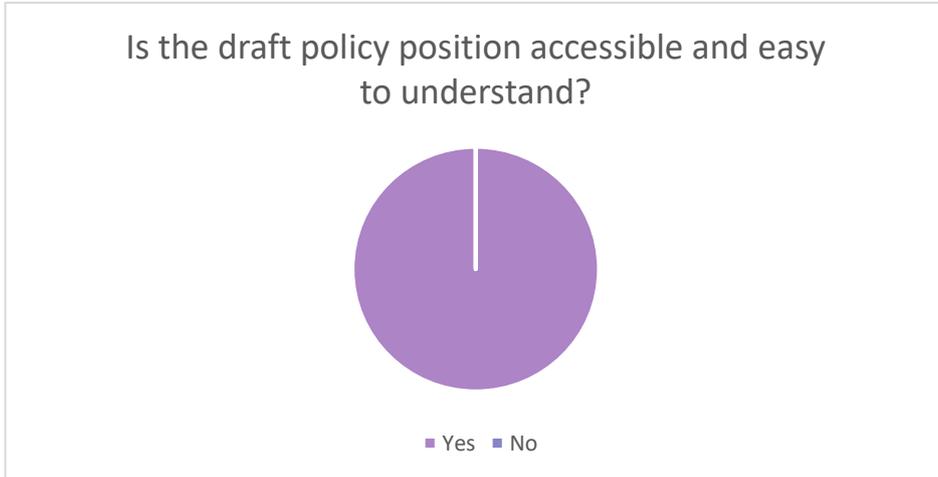
We would like to thank everyone who took the time to respond to our consultation; your comments have been extremely helpful in strengthening the content and increasing accessibility of the document.

## Poll Results

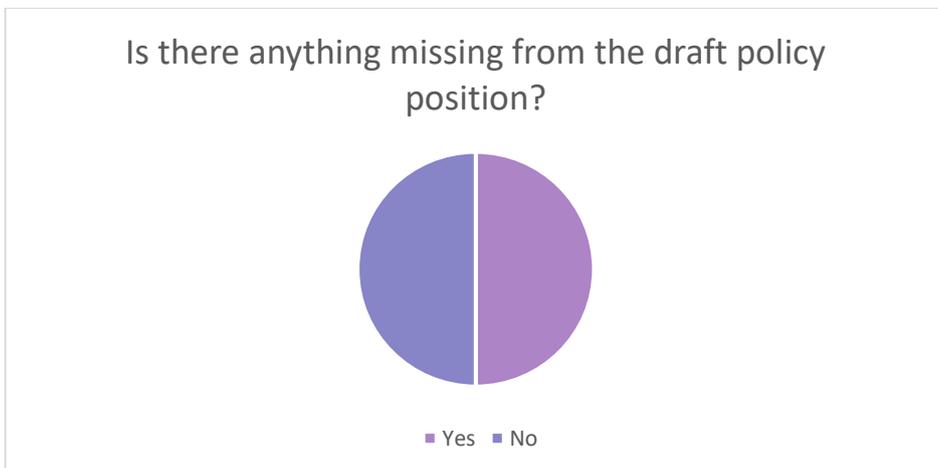
2 people responded to this poll.

We asked the following questions:

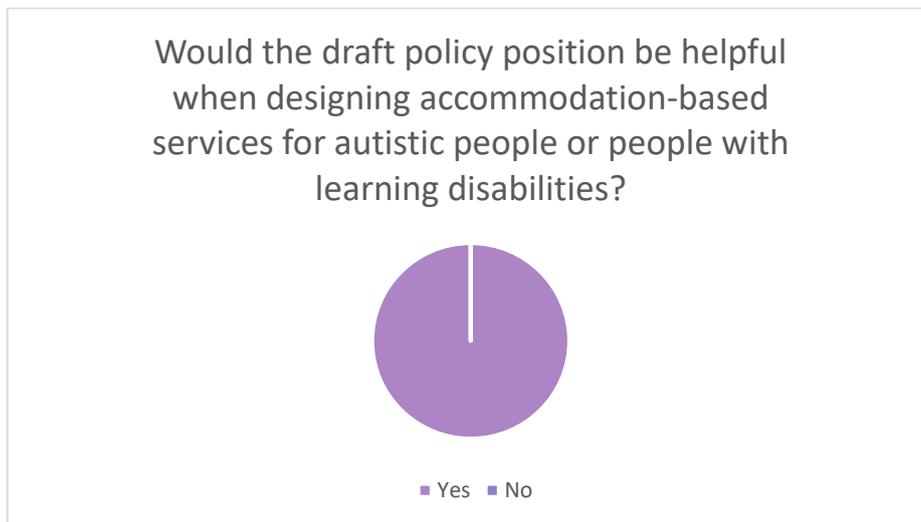
1. Is the draft policy position accessible and easy to understand? 2 people (100%) said the guidance was accessible and easy to understand.



2. Is there anything missing from the draft policy position? 1 person (50%) said that there is missing information, 1 person (50%) said there was not.



3. Would the draft policy position be helpful when designing accommodation-based services for autistic people or people with learning disabilities? 2 people (100%) said that this guidance would be helpful when designing accommodation-based services for autistic people or people with learning disabilities.

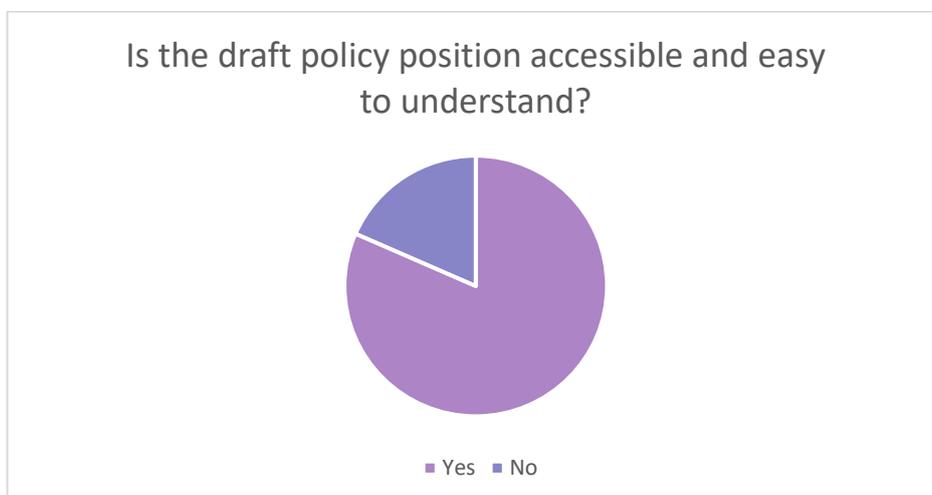


## Survey Results

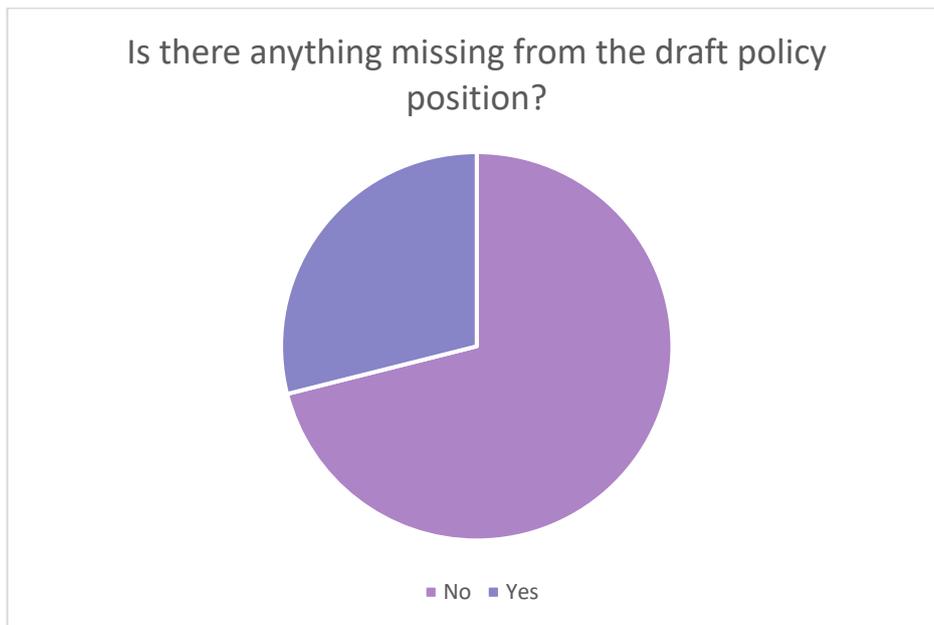
38 people responded to this survey.

We asked the following questions:

1. Is the draft policy position accessible and easy to understand? 31 people (82%) said that draft policy position is accessible and easy to understand.



2. Is there anything missing from the draft policy position? 27 people (71%) said there was no missing information.



3. Would the draft policy position be helpful when designing accommodation-based services for autistic people or people with learning disabilities? 28 people (74%) said that the draft policy position be helpful when designing accommodation-based services for autistic people or people with learning disabilities.



The detailed responses to these questions, and actions we have taken as a result, are summarised below.

## Responses To Feedback

You said	We did
It was not easy to find using the Scottish Government site nor Google.	Whilst we appreciate the feedback on the difficulties of locating the draft policy position for consultation, this is not relevant to the content of the draft policy position.
At points the document is not completely clear as to whether the policy guidance relates solely to Care Homes (which is our assumption) or whether the policy also relates to supported living arrangements.	We have amended the draft policy position to make it clearer what types of services are being referred to.
If the guidance will be accessible online, we would suggest audio and sub-titles be added to maximise accessibility.	We will develop an easy-read version of the document, in collaboration with autistic people and people with learning disabilities. Once published on our website, the 'Recite Me accessibility tool' provides read aloud options.
Whilst the guidance is accessible and easy to understand, I suspect that for people with learning disabilities and autism or communication differences would struggle.	We will develop an easy-read version of the document, in collaboration with autistic people and people with learning disabilities.
The guidance reads that if you have an existing care home for older people you can add a unit for up to 6 adults, whereas if you wish to register an adult only service this would be capped at 6 places in total which is contradictory.	We have amended the draft policy position to make it clearer what types of services are being referred to, and the expectations around adding a unit to an existing service.
It has americanised spelling throughout but generally flows well.	We were unable to identify any americanised spelling in the draft policy position.

It may be more helpful to open the policy document with the summary followed by the various policy documents/evidence base that will facilitate the achievement of this.	We have amended the layout of the draft policy position.
What is the position on core and cluster arrangements, where there would be more than 6 units but each person would have their own apartment?	We have amended the draft policy position to make it clearer what types of services are being referred to.
Older adults with learning disabilities could have additional needs in relation to design, layout, equipment, etc. which this draft guidance does not cover.	There are some references to environmental guidance documents under the 'Principles - care home design' section, however our document 'Care Homes for Adults - the Design Guide' is intended to cover these aspects more fully.
There is no guidance on any changes that could be made to facilitate better gradings as it states that smaller services do get increased or better gradings.	Compliance with this policy position (and other associated documentation and guidance) is designed to facilitate improved experiences and outcomes for people which should have a positive impact on grading.
No reference to individual needs.	Reference to individual needs is incorporated throughout the document, however this has been further strengthened.
What if in the future a group of more than six people (friends / companions) with learning disabilities with the support of their financial / legal guardians want to create a home of their own and this should be legally registered as an adult care home; will there be exceptions in such situations?	In this type of exceptional circumstance, we would of course give consideration to people's individual preferences. As covered under the 'Policy position' section, we would expect the applicant to demonstrate why more than six places were necessary.
No reference to the Autism strategy.	The Scottish Strategy for Autism ended in 2021, and reference to 'Learning/Intellectual Disability and Autism - Towards Transformation' was already included, however we have added in reference to 'The national strategy for autistic children, young people and adults: 2021 to 2026'.

<p>No mention of training and the need for specific skills around learning disability and/or autism, mental health etc. as separate from dementia care.</p>	<p>We have added in a brief reference to training and expertise, however our document 'A quality framework for care homes for adults' is intended to cover these aspects more fully.</p>
<p>It does not provide minimum standards of accommodation, for example, an ensuite bathroom/wetroom, access to the person's own kitchen and some living space, and an additional shared living space.</p>	<p>There are some references to environmental guidance documents under the 'Principles - care home design' section, however our document 'Care Homes for Adults - the Design Guide' is intended to cover these aspects more fully.</p>
<p>This needs to be shared more widely for consultation with Local Authority Procurement and Commissioning departments/Health and Social Care Partnerships as well as providers who might be interested in going for new tenders or redesigning current services.</p>	<p>The intention of this consultation was for all interested parties, including Local Authority Procurement and Commissioning departments, Health and Social Care Partnerships, and providers to have the opportunity to comment.</p>
<p>This guidance does not provide practical information on specific design, for example communal space, dining rooms etc.</p>	<p>There are some references to environmental guidance documents under the 'Principles - care home design' section, however our document 'Care Homes for Adults - the Design Guide' is intended to cover these aspects more fully.</p>
<p>There is scope for more specific guidance rather than just size.</p>	<p>There are some references to environmental guidance documents under the 'Principles - care home design' section, however our document 'Care Homes for Adults - the Design Guide' is intended to cover these aspects more fully.</p>
<p>It does not touch on many of the environmental specialisms that autistic people or people suffering from specific health conditions benefit from.</p>	<p>There are some references to environmental guidance documents under the 'Principles - care home design' section, however our document 'Care Homes for Adults - the Design Guide' is intended to cover these aspects more fully.</p>

The documents listed contain pretty limited information about environment.

There are some references to environmental guidance documents under the 'Principles - care home design' section, however our document 'Care Homes for Adults - the Design Guide' is intended to cover these aspects more fully.

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