



**Dim mwy o greulondeb i blant. DIM.
Cruelty to children must stop. FULL STOP.**

**NSPCC CYMRU/WALES
RESPONSE TO:
CHILDREN AND YOUNG PEOPLE COMMITTEE INQUIRY
INTO ADVOCACY**

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- 1.1 NSPCC Cymru/Wales welcomes the opportunity to provide written evidence for the committee's inquiry into the provision of advocacy services in Wales and the proposed new commissioning model.
- 1.2 The NSPCC's purpose is to end cruelty to children. Our vision is of a society where all children are loved, valued and able to fulfil their potential.
- 1.3 We seek to achieve cultural, social and political change – influencing legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.
- 1.4 NSPCC Cymru/Wales provides a children's rights based advocacy service currently to six authorities across South and Mid Wales, as well as providing some advocacy within Hillside Young Offenders Institution. The service we have provided has mostly been provision for looked after children and young people, although we have been involved in wider advocacy projects as well.

1. **There seems to be widespread consensus that advocacy services should be independent. How do you think advocacy services should be commissioned to ensure a level of independence that gives children and young people confidence and builds trust in the system at the same time as providing services which are flexible and responsive?**

Independence has been an issue that has been raised when we have spoken to children and young people who we provide advocacy for. Whilst NSPCC Cymru/Wales provides advocacy via a service level agreement with local authorities, we firmly believe that we provide an independent service, not beholden to the authority in any way. We take a children's rights approach that places the views and needs of the young person accessing the service at its heart and we are always prepared to challenge the local authority when the young person in question needs to have their voice heard. Whilst we work in partnership with local authorities in resolving issues children and young people have, we firmly believe that our status as an independent voluntary body provides children and young people with independence when they access our service.

Independence is not simply about structures it is how the advocate works with the child or young person and how they build up trust and a relationship. We believe that it is vital that this is recognised, alongside any alterations to the commissioning process. Perception of independence is an important factor and is often related to whether the child or young person believes the advocate is genuinely acting on their behalf. It needs to be taken into account that even with an alteration to the commissioning system a child or young person may still perceive that a service is not independent.

If an advocate is to be successful then there is a need to ensure there is a dialogue with and commitment from those delivering services to children and young people. This could be perceived as a potential threat to independence, but is vital for the advocate to be able to resolve any issues a child or young person has. The service provider must have a relationship with the advocacy service, so that it can be publicised by professionals and so that the issues raised by children and young people receiving a service are taken on board.

2. **The Welsh Assembly Government has consulted on a New Service Model for Delivering Advocacy Services for Children and Young People.**

- i) **Did you respond to the consultation?**
- ii) **Are you prepared to share your response with the committee?**

NSPCC Cymru/Wales' response to the consultation is attached in Annex A. Annex B is the response of the Blueprint Forum which NSPCC Cymru/Wales facilitate in RCT.

3. **The Assembly Government consultation document suggests a New Service Model which places responsibility for local and regional planning and commissioning of advocacy services with Children and Young People's Partnerships in each local authority area. The document also proposes the establishment of a Children's Advocacy Unit. The Unit will not have commissioning responsibilities or powers of inspection or enforcement. Rather it will be a national resource support to oversee the New Service Model and ensure compliance with the National Minimum Standards for the Provision of Children's Advocacy Services.**

- i) **Do you think the service model outlined is adequate to meet its stated aim of ensuring 'more independent and accessible advocacy services in which children and young people have confidence'?**

NSPCC Cymru/Wales expressed concern about the commissioning models proposed within the Welsh Assembly Government consultation, relating to the need to ensure that there was accountability for commissioning decisions being made, and that each local authority in the commissioning arrangement maintained some responsibility for ensuring that children and young people accessed advocacy when they needed to. Our limited experience of joint commissioning has been generally positive, although we recognise the potential for conflict when authorities have differing needs. We believe that if there can be greater clarity on the issue of accountability and the roles played by partner agencies then this system could be a positive development.

We understand that the Welsh Assembly Government has decided not to adopt the staged approach to implementation and we welcome this. We would like to take this opportunity to re-iterate our concerns over the move towards advocacy for all children and young people being at the expense of the need to provide services for particular vulnerable groups. Regardless of the commissioning model it is vital that specialist services are provided to ensure that those children most in need, who often have their views and voices most marginalised, are prioritised in any commissioning plan.

NSPCC Cymru/Wales was disappointed that the consultation document focussed mostly on the commissioning model. It has been our experience that there is an urgent need to ensure that advocacy is understood by local authorities and their statutory partners and that clear access routes are built.

We remain to be convinced about the way in which an “all Wales” commissioning service would work, which we understand has been suggested as an alternative. As this particular model was not included in the consultation document it has proved difficult to accurately comment on how one would operate. We believe that as local authorities, as well as other statutory services, are providing the key services to some of the most vulnerable children and young people, it should remain a duty on them to deliver the services, via an independent third party, that provide support for children and young people to have their voice heard. We feel that local authority, and other statutory services, involvement in the commissioning process is vital in order to obtain local buy in for the way in which advocacy is embedded in the approach of these agencies. The relationship between advocacy provider and commissioner is important as it allows for the provider to raise a range of issues that can impact across the whole of the commissioner’s provision. We would be interested to hear how an “all Wales” commissioning body would maintain this dynamic relationship and help statutory services improve what they needed to commission. Any commissioning structure also needs to take into account the different needs of children and young people within authorities, we would be interested to hear more on how an “all Wales” model would propose to meet the diverse needs of children and young people locally.

Advocacy in social care is much more established than advocacy in health or education. Considerable work will probably have to be done with these later agencies in order for an understanding to be developed whereby a professional would know the role of an advocate and how a young person could access them. The underdevelopment in these statutory agencies could also have impact on effective commissioning, as it may be that the experience of social care is relied upon to lead commissioning arrangements. This would not encourage advocacy to be embedded in other statutory partners. We are currently unclear as to how a national commissioning body would help support and develop understanding in these areas.

- ii) **What are your views on the Children’s Advocacy Unit as outlined in the consultation document? What role and function would you like to see a national advocacy unit taking?**

NSPCC Cymru/Wales felt that the detail on the Advocacy Unit in the consultation was limited and find it difficult to comment in more detail than we did in our initial response. The support that the Unit might provide in terms of ensuring compliance with national standards and helping to disseminate best practice is to be welcomed. NSPCC Cymru/Wales would welcome further information on whether the Unit will have a role in monitoring the length of contracts and developing an agreed framework for contracts. We would also welcome more information on how the Unit will ensure that specialist provision is being made and adequately funded for certain specialist groups, such as children with a disability.

Conclusion

NSPCC Cymru/Wales believes that the issue of independence is only one in a host of other major issues that may prevent children and young people in Wales from accessing advocacy in an effective and timely way.

We strongly believe that the Children and Young People's Scrutiny Committee should also consider issues around length of advocacy contracts, standardised contracts, sustainable funding levels, understanding of advocacy within statutory services, the wider embedding of participation within statutory services, and the provision of specialised advocacy for particular groups, such as those with a disability, alongside the question of independence. Without these issues being resolved any commissioning process will still not create improved access and better outcomes for children and young people who are wishing to access advocacy services.

NSPCC Cymru/Wales would be happy to discuss any of the issues raised within this response further with the committee.

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**Dim mwy o greulondeb i blant. DIM.
Cruelty to children must stop. FULL STOP.**

**NSPCC CYMRU/WALES
RESPONSE TO:**

**A NEW SERVICE MODEL FOR DELIVERING
ADVOCACY SERVICES FOR CHILDREN AND
YOUNG PEOPLE**

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July 2007

- 1.5 NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation the strategy for a new service model for delivering advocacy services for children and young people.
- 1.6 The NSPCC's purpose is to end cruelty to children. Our vision is of a society where all children are loved, valued and able to fulfil their potential.
- 1.3 We seek to achieve cultural, social and political change – influencing legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

NSPCC Cymru/Wales would like to highlight before addressing the consultation questions that the child/young person friendly version failed to summarise appropriately the key issues and proposals set out within the document. NSPCC Cymru/Wales will also be facilitating a response from children and young people who have been/are currently in contact with our Children's Advocacy and Representation service, which provides a service to children in need within six local authority areas. We would urge the Welsh Assembly Government to consider the views of children and young people and to ensure that future strategies in need of their input are far more accessible to their target audience.

NSPCC Cymru/Wales would also like to highlight that whilst consultation questions provide a structure for responses across Wales, we have concerns around the issue of agenda setting. We have tried to incorporate any issues we had as a result of the proposals within the framework of questions. We would urge the Welsh Assembly Government to look into their consultation process and address such issues that may arise.

Consultation Questions

Q1: Have we accurately summarised all the key national drivers for change and their findings or conclusions?

Q2: Are there any that we should add, or give more weight to?

NSPCC Cymru/Wales agrees that the strategy has identified many key drivers for change. The key messages and recommendations from each are highlighted though it is disappointing that the strategy fails to refer back to these. We would welcome a reference to how the proposed new service model for delivering advocacy services for children and young people in Wales will meet these recommendations.

NSPCC Cymru/Wales welcomes the holistic approach to the definition of advocacy support within the introduction to the strategy and the reference to the definition used within the National Standards for the Provision of Advocacy Services (2003). Advocacy must be acknowledged as the mechanism to empower and support children and young people within various contexts, not only in making a complaint. Our Children's Advocacy and Representation service deals with many types of referrals, all of which reflect the needs of the child/young person and their wish to seek resolution and avoid formal complaint procedures. We would urge the Welsh Assembly Government to address this and ensure that a clear understanding of advocacy as being broader than just complaints is promoted.

Q3: Do you agree with our vision and overall aims for advocacy services for children and young people in Wales?

Q4: Should the key aspects be strengthened or amended in any way?

Q5: Do these arrangements meet the requirements for accessibility and independence?

NSPCC Cymru/Wales is pleased to note the inclusion of the Welsh Assembly Government's commitment to the UNCRC and the seven core aims within the strategy.

NSPCC Cymru/Wales is also encouraged by the acknowledgment that children and young people have access to quality and safe independent advocacy services as the strategy's central theme. However, we are disappointed by the overall lack of further information and guidance around this. Details of roles and responsibilities amongst all professionals working in advocacy settings appear vague. NSPCC Cymru/Wales, as one of the main advocacy providers in Wales, would urge the Welsh Assembly Government to provide further clarity around the operational changes envisaged as part of a new service model.

NSPCC Cymru/Wales agrees with the long-term outlook to embed advocacy services within the participation agenda. We believe the Welsh Assembly Government should lead by example and ensure that statutory organisations fully endorse Article 12 of the UNCRC, and enable children and young people to practice their right to participate. However, NSPCC Cymru/Wales would urge the Welsh Assembly Government to ensure that advocacy provision for children and young people who are potentially most vulnerable and in need of such provision, remains a high priority.

These children and young people may need advocacy support in order to participate. Therefore NSPCC Cymru/Wales believes that a new model for delivering such services must ensure that the appropriate structures are in place to secure two-way communication processes between children, young people and decision-makers. Such structures may currently be in place, e.g. children and young people fora, Framework Partnerships etc. These may enable decision makers to adopt a participatory culture and help give some of the most vulnerable children and young people back some control over their lives.

Whilst NSPCC Cymru/Wales believes there is a need to proactively encourage children and young people to access advocacy services, we are aware that there is an increase in the number of helplines throughout Wales which may potentially confuse and disengage children and young people in need of such provision. We would also urge the Welsh Assembly Government to consider the resource implications here and whether such funding would be more effectively channelled to the development and expansion of service provision and the promotion of such service by professionals.

NSPCC Cymru/Wales would also welcome a more child-centred approach to the promotion of such service provision. Professionals involved in the commissioning and delivery of advocacy all have a role to play in the promotion of the service amongst children, young people and their families. This must be addressed to further empower children and young people to take up such opportunities when necessary and feel supported when doing so.

Q6: Do you agree with the proposed staged approach of collaborative commissioning and have we correctly identified the areas which require priority attention within the New Service Model?

NSPCC Cymru/Wales notes the three staged approach to service development to be facilitated by collaborative commissioning procedures. However, NSPCC Cymru/Wales was disappointed not to be given any explanation of how the three stages were determined. NSPCC Cymru/Wales would welcome further clarity here and to feed in any concerns/issues we have in relation to the identification of children and young people within the staged approach.

If a staged approach is deemed most appropriate, it must be well informed and evidence based. We would urge the Welsh Assembly Government to consider this and to report back on the information gathered which led to the proposed stages.

NSPCC Cymru/Wales were disappointed to find that children and young people currently known to the Youth Offending Teams and Lesbian, Gay, Bisexual and Transgender children and young people were not evident within the categories of the staged approach. NSPCC Cymru/Wales believes this highlights a concern that by categorising children and young people, there is a great possibility that a staged approach may miss many who are potentially more vulnerable and in need of service provision. We would urge the Welsh Assembly Government to consider the potential dangers here.

NSPCC Cymru/Wales also feels that it must be highlighted that children and young people may often present themselves within more than one category. This is not addressed within the strategy and could lead to confusion in practice. Despite the fact that commissioners and providers “must apply discretionary judgment on the need to provide support to children and young people not listed in this group but would benefit from the service” (stage two, pg 16), NSPCC Cymru/Wales does not feel that this will enable a consistent approach to service provision. We also feel that this could lead to inequity across service areas.

NSPCC Cymru/Wales would urge that those responsible for the commissioning of advocacy services as part of this new model continually aim to ensure that the needs of those children and young people within a staged approach (if deemed appropriate) are at the forefront of their commissioning work. Commissioners must be supported in their role and ideally have expertise around advocacy to ensure that the needs of children and young people accessing services are met to the highest standard. We would urge the Welsh Assembly Government to ensure that a child-centred approach is embedded into the work of commissioning advocacy services. Further guidance on implementation of a new service model and the expectations around role and responsibilities is necessary to avoid confusion in delivery. NSPCC Cymru/Wales urges the Welsh Assembly Government to recognise that children and young peoples' needs may potentially go unmet until this happens.

NSPCC Cymru/Wales would also urge the commissioners of the new service model to recognise and address the impact their decisions have upon service providers. Our experience of a similar service model to date has raised issues in relation to stage three. This has involved re-prioritising our advocacy work and engaging with agencies working within participation to identify the unmet needs of local children and young people. Despite welcoming this wider approach to advocacy, NSPCC Cymru/Wales would urge the Welsh Assembly Government to ensure that commissioners acknowledge and address the capacity and funding impacts of extending provision upon all service providers.

Q7: Do you agree with the principle of moving towards a more integrated model of provision?

NSPCC Cymru/Wales is unsure as to the meaning behind an 'integrated model' and this has proven difficult to comment on. We would urge the Welsh Assembly Government to acknowledge that misinterpretations of terms can lead to unclear understandings and hope that this can be addressed in future.

We have taken the question to mean integrated in the sense that embedding advocacy in the wider participation agenda will mean universal access to advocacy services for all children and young people.

Despite the recognition that commissioning partnerships will link specialist advocacy to existing local arrangements for children and young people's participation, we have concerns here. NSPCC Cymru/Wales would urge the Welsh Assembly Government to ensure through the new service model proposed that advocacy services remain available to those children and young people who are potentially more vulnerable and in need of such specialist support. We would urge the Welsh Assembly Government to ensure that potentially spreading resources thinly to accommodate wider participation will not result in advocacy provision being watered down. The views of children and young people who are hardest to reach must be a priority for the work of participation.

As detailed previously under Questions 3, 4 and 5, NSPCC Cymru/Wales wishes to further highlight the fact that some groups of children and young people may need advocacy support to participate. The strategy does not identify this issue. Therefore, we would urge the Welsh Assembly Government to continue to recognise the importance of advocacy and to ensure that embedding such practice within the wider participation agenda does not jeopardise provision.

Collaborative Commissioning Partnerships are said to lead on ensuring that advocacy is embedded within the participation agenda. NSPCC Cymru/Wales would urge the Welsh Assembly Government to provide those responsible with a clear definition of their role. We also urge the Welsh Assembly Government to ensure that commissioners themselves adopt participatory practice and that they themselves listen to children and young people on issues that affect their lives. They must also recognise the potential role of advocacy within this.

Q8: In what circumstances do you consider advocacy service should be available in schools?

NSPCC Cymru/Wales believes that the reference made to independent advocacy services within education settings within the strategy relies heavily on the complaints aspect rather than its wider remit. We have addressed this concern under Question 6 though would reiterate that the Welsh Assembly Government to promote a better understanding of what advocacy provision involves.

NSPCC Cymru/Wales would welcome the provision of advocacy within schools, however we would urge the Welsh Assembly Government to ensure that a number of issues are first addressed.

NSPCC Cymru/Wales believes that children and young people in education are also children and young people in other contexts. We would urge the Welsh Assembly Government to ensure that these children access advocacy support according to their wider experiences and needs not only by the virtue of their educational status.

NSPCC Cymru/Wales believes there to be real opportunities to develop wider participation, peer advocacy and individual advocacy in schools but this will not accommodate the harder to reach children and young people who are excluded and may be in real need of advocacy. NSPCC Cymru/Wales believes advocacy support should be targeted at such children and young people though also identifies scope here to create opportunities to provide school-based advocacy at an early stage, not only as a response to exclusions or major problems in education settings. We would urge the Welsh Assembly Government to consider this and to recognise the potential of advocacy provision to prevent an escalation of issues for children in school.

There is also the need to ensure that education professionals have a well developed understanding of advocacy and the positive benefits that it can bring to a pupil. This will allow them to signpost and promote the service as necessary. There is a clear training need in health and education in relation to their understanding of advocacy.

Q9: How can we define a serious complaint and in what circumstances do you feel advocacy support would be important?

NSPCC Cymru/Wales believes this to be a very subjective issue. We believe that seriousness may be interpreted differently between children, young people and their families. NSPCC Cymru/Wales urges the Welsh Assembly Government to highlight the need to define seriousness through the impact on the child or young person of the issue, not the issue itself.

Q10: Are there other groups of children and young people that should be included in the service model two?

On answering this question, NSPCC Cymru/Wales has taken this opportunity to refer to the staged approach to the delivery model and reference the points addressed under Question 6 as to groups of children and young people who were missing from the strategy's criteria.

However, NSPCC Cymru/Wales also feels there is opportunity here to address the timescales involved in implementing the staged approach. Despite the fact that we currently have experience of stages one, two, and to a certain extent, three in some areas, for other areas, the implementation deadline does not realistically reflect the time needed to distinguish and agree regional partnership areas, develop skill and provide adequate training for staff. We would urge the Welsh Assembly Government again to take a child-centred approach here and recognise the impact this will have on advocacy service provision, already thinly resourced and inadequately funded.

Q11: Is the proposal for collaborative commissioning across local areas the most realistic and the best way forward to achieve improved access to independent, quality advocacy services for children and young people?

Q12: How might collaborative partnerships be defined across Wales? Are there any existing partnerships relevant to your area and/or to advocacy services that could be used or further developed for this purpose?

Q13: What other influences on commissioning or commissioning drivers relevant to children and young people's services do we need to take into account?

NSPCC Cymru/Wales welcomes the developments of a collaborative approach to commissioning. However, we are concerned that there is an unbalanced focus on the role of commissioning within advocacy service provision within the strategy. We are concerned that the strategy is process focused and fails to acknowledge the possible affects decisions may have on advocacy provision. NSPCC Cymru/Wales would urge the Welsh Assembly Government to lead by example and adopt a child-centred and needs-led approach to commissioning. NSPCC Cymru/Wales would urge the Welsh Assembly Government to ensure that those responsible for commissioning advocacy services hold the relevant level of expertise to enable service users' needs to be met most effectively. Social services currently take lead on the majority of advocacy commissioning and NSPCC Cymru/Wales hopes that the expertise of such representatives will increase and not dissolve with more agencies coming onboard.

One of the major influences NSPCC Cymru/Wales believes will impact on commissioning is funding, which appears vague within the strategy. We would urge the Welsh Assembly Government from a child-centred approach, to detail the implications on current 'live' service level agreements and how contracting will be affected by the new model proposed. NSPCC Cymru/Wales would urge the Welsh Assembly Government to address the concern we have that competitiveness will accentuate as a result of the proposed commissioning structure and that the cost-effective provision will dominate over the needs of children and young people around advocacy.

NSPCC Cymru/Wales believes that one way of ensuring that such service providers' issues are considered and addressed is the role we will play in the development of local commissioning strategies. NSPCC Cymru/Wales welcomes the reference made to current guidance around joint commissioning and would urge the Welsh Assembly Government to ensure that commissioners seek the views of advocacy providers within the commissioning process and in developments of local strategies, as detailed within 'Rights to Action: Stronger Partnership' (2006).

We also welcome the reference made to the responsibility of the Lead Commissioner within the new service model to engage with stakeholders, including children and young people themselves. This will help create a participatory approach amongst commissioners and enable children and young people to exercise their right to express their views on issues that may affect their lives, in accordance with Article 12 of the UNCRC.

Through a child-centred and needs-led approach, NSPCC Cymru/Wales feels that there is an opportunity for collaborative commissioners to develop in terms of identifying specialist components of advocacy providers in Wales, available to partnership regions. NSPCC Cymru/Wales believes that through the role of Lead Commissioners, children and young people's advocacy needs can be better met through identifying specialisms amongst providers and signposting individuals to the most appropriate service. We would urge the Welsh Assembly Government to consider this.

The development of collaborative commissioning across areas may also be of benefit to service users in terms of pooled funding. NSPCC Cymru/Wales believes this to have the potential to increase service quality and accessibility for vulnerable groups in need of advocacy support. However, we would urge the Welsh Assembly Government to ensure that they continually map advocacy provision and ensure that appropriate mechanisms are in place to avoid inequities in service provision.

With regard to the selection of regions, NSPCC Cymru/Wales believes this may potentially cause problems for CYPP areas. If mandatory groupings are not expected or areas have no

existing partnerships currently in place, NSPCC Cymru/Wales believes this could make for further incoherence. We would urge the Welsh Assembly Government to be more explicit in terms of set up guidance. If this is not provided, NSPCC Cymru/Wales believes that the timescales identified will not be achieved and the needs of vulnerable children and young people will be unmet in the interim.

Further to the lack of guidance around set up procedures, NSPCC Cymru/Wales is concerned that the steering group proposed as part of service model two, comes with no information or guidance as to its role or responsibilities. Experience of a 'steering group' approach to advocacy provision has informed us that such a group needs to be multi-disciplinary and adopt an information-sharing and collaborative approach. Representatives need to consistently attend meetings and be able to discuss effectively amongst agencies. We would urge the Welsh Assembly Government to ensure this.

Q14: How might the lead Children and Young People's Partnership for collaborative commissioning be selected?

NSPCC Cymru/Wales was disappointed not to find any guidance relating to the appointment of a lead CYPP for each region. We would urge the Welsh Assembly Government to ensure that any decisions made around the appointment of a lead CYPP are in the best interest of the children and young people who will potentially access advocacy services. Each lead CYPP must hold the appropriate expertise, ability to commit both finance and people resources to the governance of commissioning advocacy services. We would urge the Welsh Assembly Government to ensure that such criterion is met throughout Wales.

NSPCC Cymru/Wales also holds concerns around the possibility that partnership working runs the risk that not all members will commit fully if a Lead CYPP is selected. Each partnership may have conflicting service user needs to address and NSPCC Cymru/Wales believes this may cause unworkable relationships to materialise between partnerships. We would urge the Welsh Assembly Government to consider this issue and ensure that the partnership areas commit to working collaboratively and consistently despite a lead area being placed with the governance of advocacy service commissioning.

Q15: What are the barriers to establishing a lead Children and Young People's Partnership lead commissioner for advocacy services, and how might they be overcome?

Q16: Which structural model outlined in section six do you prefer and why: model one or model two?

Q17: Are there any models that you think we should also consider, and what are their key characteristics?

Q18: Are the roles and responsibilities of key commissioning partners outlined in section six sufficiently clear and robust?

Q19: Are the commissioning principles outlined in section six sufficiently clear and robust?

Q20: Are the proposals for governance and performance management sufficiently robust? Are there any that we have missed?

NSPCC Cymru/Wales notes the limited options of service models proposed within the strategy though believes that service model two would be more likely to address issues around accountability. We would urge the Welsh Assembly Government to ensure that representatives at this strategic level will reflect those who have experience and a solid understanding of advocacy provision not only the commissioning of services. We would urge the Welsh Assembly Government to produce clear guidance around the responsibilities of representatives here at the outset, which must adopt a child-centred approach to service provision.

The lead commissioner and steering group will play a key role in collaborative commissioning. NSPCC Cymru/Wales' experience of advocacy provision to date has highlighted issues around perceived independence of services amongst children and young people. We hope that the new service model will go some way in alleviating issues around independence, though we feel that this again emphasises the need for the Welsh Assembly Government to provide clear guidance around the set up of such structures. We would urge the Welsh Assembly Government to address this promptly.

NSPCC Cymru/Wales would also urge the Welsh Assembly Government to ensure that such guidance includes the role and responsibilities of key commissioning partners to engage with children, young people and their families, as the key stakeholders in service development.

NSPCC Cymru/Wales believes the role of Lead Commissioner must be independent from all CYPP areas and the Welsh Assembly Government must ensure that they have the capacity to identify the needs of children and young people accessing advocacy services. We would urge the Welsh Assembly Government to consider mapping current service provision and identify scope to create a 'directory of services' as is currently being developed by the All-Wales Advocacy Providers Group.

NSPCC Cymru/Wales would also like to highlight the lack of explicit connection between the set up of both service models and the Welsh Assembly Government itself. We would urge the Welsh Assembly Government to detail the link here to ensure communication is maintained and that lines of accountability are clearly understood by all. We would also urge the Welsh Assembly Government to detail clear guidance around governance and performance management adopted by all area partnerships through the proposed framework.

In relation to the commissioning principles set out within the strategy, NSPCC Cymru/Wales believes them to be well documented and coherent. However, we would urge the Welsh Assembly Government to ensure that these principles are adhered to *and to maintain a prominent safeguarding approach to commissioning advocacy services.*

Q21: Do you agree that we have adequately identified the support and development needs to ensure the delivery of the service model proposed?

Q22: What additional forms of support might be necessary?

Q23: Are the timescales for implementation of commissioning service under the New Integrated Service Model (by 2008 for stage one and two) achievable – are there any constraints?

Q24: What will be the impact and cost implications on your business in introducing the New Service Model?

Q25: Do you consider we should set up an Advocacy Unit as suggested above?

Q26: Would it be advantageous to set up a Board, i.e. to monitor progress and advise Assembly Government Ministers?

Q27: What do you feel would be the minimum representation membership on the C&YP Advocacy Advisory Board?

NSPCC Cymru/Wales welcomes the additional support set out in the strategy to implement the new service model proposed. The key tools and materials outlined would be welcomed though NSPCC Cymru/Wales again holds concerns here around the dominance of commissioning processes over advocacy provision. We agree that commissioners need to be versed in commissioning processes though would urge the Welsh Assembly Government not to lose sight of the importance of understanding the specialist area of advocacy provision.

The mixed support package also detailed within the strategy would be a welcomed response by the Welsh Assembly Government in attempting to meet the resource needs of advocacy provision throughout Wales. However, NSPCC Cymru/Wales would urge the Welsh Assembly Government to acknowledge and address the possibility that specialist commissioning consultants may not have expertise in advocacy provision and therefore may not be best placed to provide advice and support in this area. We would urge the Welsh Assembly Government to promote a child-centred approach here and to ensure that commissioners adopt this whilst carrying out their role and responsibilities.

NSPCC Cymru/Wales welcomes the targeted £25,000 to each partnership proposed. This will help enable partnership set up though we would urge the Welsh Assembly Government to go one step further and ensure that a continued commitment to funding advocacy services in Wales is made.

NSPCC Cymru/Wales holds concerns around the clarity between the proposed national resource support and the Advisory Board detailed within the strategy. We would welcome more clarity around roles here. However, we welcome the potential support these will provide to service provision in meeting the needs of children and young people who need to access services. NSPCC Cymru/Wales also welcomes the monitoring and evaluative role the proposed Advisory Board will have. We would urge the Welsh Assembly Government to ensure that such roles are fulfilled and that there is a clear line of communication and accountability with the Board and each collaborative commissioning partnership as well as the Welsh Assembly Government itself.

In relation to timescales, NSPCC Cymru/Wales holds concerns around the achievement of these as the strategy provides no practical guidance in terms of set up. We would urge the Welsh Assembly Government to address this and to ensure that services currently under extreme pressure to meet the needs of children and young people in need of advocacy are not accentuated by lack of information and guidance around the new service model proposed at the outset. NSPCC Cymru/Wales would also like to highlight the clash of deadlines between the consultation itself and the 'expressions of interest' form attached at Annex 2. We ask the Welsh Assembly Government to explain the reasoning behind this and to readdress the timescales involved.

Q28: Should advocacy services/ providers be regulated?

Q29: Should advocates be a recognised profession?

Q30: What are the implications to your service in requiring registration and regulation of advocacy providers?

NSPCC Cymru/Wales looks forward to having sight of the Children's Workforce Strategy soon to be published by the Welsh Assembly Government.

NSPCC Cymru/Wales would urge the Welsh Assembly Government to make mandatory the requirement for an 'enhanced' Criminal Records Bureau check of any individual requesting to work with children and young people. We would also urge the Welsh Assembly Government to ensure that organisations providing advocacy throughout Wales have robust and high quality safeguarding measures in place, and to monitor this requirement.

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Annex B

FEEDBACK FROM BLUEPRINT, RCT on suggested changes for Advocacy Services for Children and Young People in Wales

On being asked how Children's Advocacy could be improved, the young people said the following:

They would like the service to be independent, confidential. They would like more advocates, more choice of advocates. They would like to be able to keep the same advocate. They liked to have someone to talk to 'for yourself'. They would like them to visit more regularly. The young people suggested drop-in centres. There is one service for advocacy in Rhondda Cynon Taff, which is based in Pontypridd. This is a long way for a young person in, for example, Treherbert to 'drop in' to. They suggested a 24 hour service. The young people would like to see more Forums set up for young people in Wales, where they can 'have our say'.

In response to the suggested changes in advocacy, the members of Blueprint Forum felt that Stage One was concentrated on complaints. They stated ...'We don't just want help with complaints but help with problems'. They further said'Why is Group 1 all about complaints?' ...'Who will help young people get their views heard so they don't have to make a complaint?'

The young people also asked on what evidence was it decided to make the priority Stage 1 and 2 groups? They asked 'Who decided the groups?' The group asked if the advocates were going to be social work qualified advocates. They felt that, when dealing with issues regarding social services, this was very important – that they were social work qualified.

The members of Blueprint Forum further felt that young people had not been consulted enough on the changes. They asked who from the WAG was speaking to them so they were fully 'clued up' about the new changes? Two facilitators of the Forum ran a session on the proposed changes because the young people asked for this, but they are no experts. The young people felt the WAG should have done more to consult young people.

The members of the Forum hope that the above views are helpful. The members contributing to this consultation are:

Mia Wingfield, Lisa Armstrong, Alex Davies, Neil Edge, Glyn Davies,
Sam Millward, Kelly Harris and Laura Harris.

**Fiona Stevens,
Blueprint Co-ordinator
Children's Advocacy & Representation Service (CARS)
South East**