



PLANT YNG NGHYMRU
CHILDREN IN WALES

All-Wales Children and Young People's Advocacy Providers Group

Our recommendations for the next Welsh Government



The All-Wales Children and Young People's Advocacy Providers Group are calling on the next Welsh Government to prioritise access to advocacy support for babies, children and young people, and for those in positions to advocate for them.

The next Welsh Government should commit to the following:

Review of the National Approach to Statutory Advocacy (NASA)

It is almost 10 years since the landmark National Approach to Statutory Advocacy (NASA) model was introduced following extensive partnership work carried out by the Welsh Government and ADSS Cymru on behalf of Local Authorities in Wales. These developments were in response to a series of lengthy reviews and inquiries into arrangements for the provision of independent professional advocacy (IPA) services to better safeguard children in care, which included the Children's Commissioner for Wales Missing Voices report (2012) and the recommendations of the Ministerial Expert Group for Advocacy (2014).

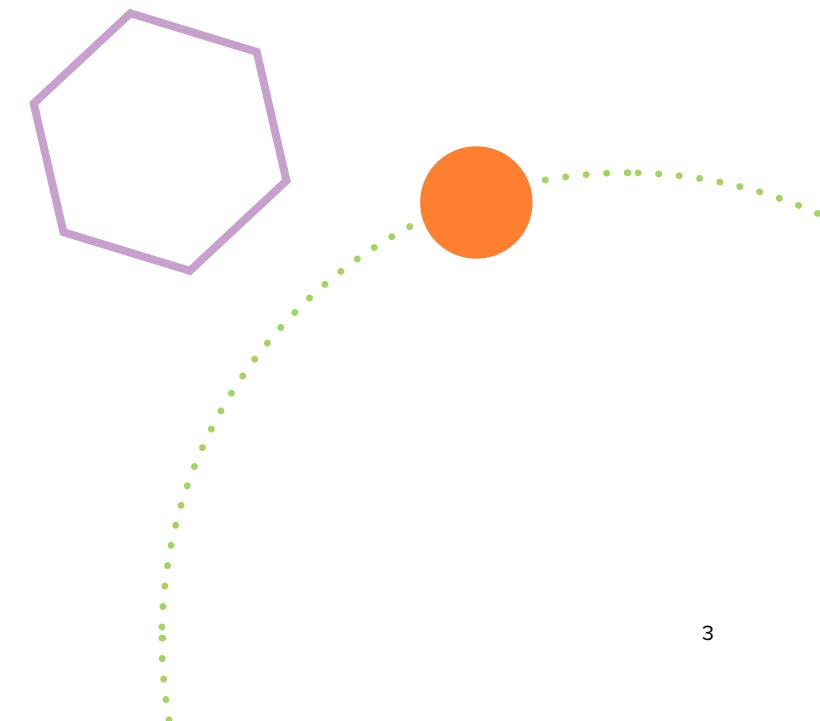
Key components of the NASA include a Service Specification; National Standards and Outcomes Framework; Range and Level Funding Mechanism and a Performance Reporting Template. Sections of the NASA are supported by statutory guidance through Part 10 of the Social Services and Well-Being (Wales) Act 2016 which introduced the **Active Offer**, alongside registration and inspection arrangements for IPA services through the Regulation and Inspection of Social Care (Wales) Act 2016 (RISCA).

10 years on and following further reviews by Senedd scrutiny committees and representation made by members of this Group, there is now an urgent need to independently review the operation and delivery of the NASA. This is to ensure it remains fit for purpose and continues the national coverage which is a core part of its design and intention.

An independent review must include the following components.

Range and Level Tool (Funding Mechanism)

The current system which determines the level of funding for commissioned advocacy arrangements is complex and is not being adhered to, with the formula and process in need of an urgent review. The Range and Level tool was intended to provide an agreed formula to determine the calculation of funding for the delivery of IPA provision aligned to the care experience population, children subject to a child protection plan and children eligible for a care and support assessment of need. This review must be carried out independently and build upon the commissioned report produced by Cordis Bright in 2023.



National Commissioning Framework

There is still no national commissioning framework in place to provide direction for regional commissioning boards to procure IPA services for children in care and other eligible groups of children. A national framework would deliver clarity needed around eligibility¹ and ensure consistency of approach to commissioning arrangements across the whole of Wales, allowing for long term thinking, be procurement compliant and providing greater stability for the workforce. The framework should be aligned to the National Standards and Outcomes Framework to ensure that eligible children are clear as to the minimum standard they can expect from a service, and that commissioning arrangements are RISCA compliant.

We believe the commissioning framework should include:

- The total cost of service provision in line with the range and level tool
- A five-year contract
- The scoring for all tender submissions to be based 100% on quality
- Equality and Impact Assessment information
- An agreement of payments which do not include arrears
- Annual review of population of eligible children including children in care and children subject to child protection, and projections for Active Offers.

Active Offer

We know through our services that not all children in care are receiving their entitlement as a right to an Active Offer, despite it being in place for over 8 years. We are of the view that take up and understanding of the Active Offer needs to significantly improve. We continue to have concerns around the inconsistent recording and application of the Active Offer across local authorities and regions in Wales.

A review of the implementation of the Active Offer should include

- the development and full roll out of a national **Active Offer Recording Template** to ensure there is consistency of data collection across all 6 regions and 22 local authority areas. Presently there is a variety of systems to collect data being used and much of the data is collected manually.
- an analysis of the take up rates and reasons for refusal/opting out/non-take up rates by eligible children and young people.
- The process for informing an eligible child of their right to an Active Offer, and their continued right throughout their time in care. This should include an Active Offer for non-instructed advocacy for children who are unable to express their own wishes and needs due to lacking capacity.
- A review of existing referral pathways, which should include a requirement to engage directly and meaningfully with children and young people to inform any changes needed to the current referral process.

Residential Visiting Advocacy

There should be a legal requirement for Independent residential visiting advocacy services to be available to all children looked after in all residential care settings. In line with the opportunities provided by the Health and Social Care (Wales) Act 2025 to remove profit from the care system, the Active Offer process should be triggered prior to and during a child transferring from independent provision to a not-for profit setting.

¹ For example, children who are adopted, homeless, subject to youth justice arrangements or transitioning from child to adult services (e.g. Disabled children and children accessing mental health support) etc.

Alongside a review of the NASA, the following engagement structures must be in place to support delivery.

National Forum on Children's Advocacy

There is a need for robust national governance, accountability and oversight for the implementation of the NASA and Active Offer by the Welsh Government. The current strategic leadership forum should be enhanced to ensure that it has sufficient capacity, resource and decision-making powers at its disposal. The forum should be led and managed by senior officials in the Welsh Government with clear oversight arrangements to ensure that actions are completed and full engagement from all forum members is maintained. The Minister responsible for children's advocacy should attend at least on an annual basis.

Engagement between regions, local authorities and independent professional advocacy (IPA) providers

All regional commissioning bodies and local authorities must ensure there are regular engagement and partnership working arrangements in place with IPA service providers. Monitoring meetings should provide an opportunity to consider ways in which their services and the Active Offer can be better promoted to eligible children in addition to providing training, briefing and professional development opportunities to frontline workers.

Other pressing issues

IPA provision in health, mental health and education settings

Limited progress has been made during this Senedd term to enable children and young people to access IPA support to help address issues concerning their physical and mental health, or matters relating to their education. Very few local authorities commission IPA services beyond those for children in care and other eligible children in need of care and support. In relation to health, the Children's Commissioner for Wales has previously called for new guidance for health boards to help ensure that every child in Wales has access to independent health-related advocacy should they need it. Limited progress has been made to take forward this recommendation despite repeated attempts by this Group to see the provisions of the Social Services and Well-being (Wales) Act 2014 delivered as intended.

Universal advocacy provision

Since its inception, we have supported and valued the universal Meic Cymru offer of free, anonymous, information, advice and advocacy support to all children and young people up to the age of 25 in Wales. We also value Meic Cymru's offer to their community of carers, trusted adults, practitioners and professionals. We would welcome the enhancement and expansion of this offer to ensure children and young people in need of having their voice heard - on specific issues at specific times in specific settings, and at points of transition - are able to access the in-person advocacy needed, and where other forms of advocacy are not suitable or available.

Whilst a small number of local authorities have commissioned independent issue-based advocacy services for children and young people through the Families First programme, this is far from being available on a pan-Wales basis.

Independent Visiting

Independent Visiting (IV) provides a complimentary and statutory service for children looked after to support their general wellbeing, yet still suffers from being poorly promoted and funded, lacking clear referral procedures and pathways, with the consequence being low take up rates amongst eligible populations of children in Wales. The National Standards and Good Practice Guidance² (2020) for Independent Visiting provide a commissioning framework aligned to a comprehensive set of 14 standards providing support and good practice examples for practitioners to help them assess the need for an IV in every Care Review meeting. There is an urgent need to transfer guidance into practice and ensure that an IV service is available in every local authority in Wales.

Parent advocacy

Whilst we welcome developments to establish and roll-out a pan-Wales programme of parent advocacy services to support parents and carers whose children are, or have had involvement with social services, there is an urgent need to secure longer term funding alongside a national framework and strategic forum for all service providers. This to include providers delivering parental advocacy as part of their statutory IPA delivery commissioned by local authorities under the SSWB Act. Parent advocacy support is critical in providing support to help parents positively engage with professionals to resolve issues and help reduce the number of children entering the care system, in addition to having an opportunity to have their voices, wishes and feeling heard.

About

The All-Wales Children and Young People's Advocacy Providers Group was established in 2004 by Children in Wales as a professional network to promote partnership working amongst our member organisations who deliver independent advocacy services for children and young people across Wales. This network works towards providing a collective voice for the advocacy sector, developing policy positions and providing advice to support Welsh Government in the implementation of national policy and legislation, and the delivery of commissioned services at a regional level.

The All-Wales Children & Young People's Advocacy Providers Group includes representation from NYAS Cymru, TGP Cymru, Voices from Care Cymru, ProMo Cymru, Meic Cymru, SNAP Cymru, Children in Wales, Second Voice Advocacy, Advocacy Support Cymru, Welsh Government (observers) and the Office of the Children's Commissioner for Wales (observers)

<https://www.childreninwales.org.uk/professionals/our-work/advocacy/all-wales-children-and-young-peoples-advocacy-providers-group/>

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The All-Wales Children and Young People's Advocacy Providers Group is coordinated by



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² [National Standards and Good Practice Guidance](#) (2020)

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