

Statutory Advocacy for Children and Young People

This Service Specification outlines the description and requirements of the service to be provided and will assist Tenderers in preparing their tender proposal.

The Service Specification will form part of the Contract terms and conditions issued following completion of the tender process.

The XXX Region is commissioning independent professional advocacy services for children and young people for whom there is a statutory entitlement.

Advocacy is one of the key foundation stones in achieving our commitment to children's rights. We want to make sure children and young people can get help when they need it and from people that will listen to them and represent their views.

Currently there are xxx contracts in operation across the region, X Y and Z Local Authorities.

Throughout the tender process the local authorities within the region will be seeking quality whilst maximising the efficiencies gained by the aggregation of service provision.

Contents:

- 1 [Definition of Advocacy](#)
- 2 [Independent Professional Advocacy](#)
- 3 [The Service](#)
- 4 [Eligibility](#)
- 5 [Service Delivery](#)
- 6 [Residential Visiting](#)
- 7 [Promotion/Awareness raising](#)
- 8 [Active Offer](#)
- 9 [Referrals](#)
- 10 [Staffing](#)
- 11 [Quality Assurance](#)
- 12 [Participation](#)
- 13 [Review, monitoring and evaluation](#)

- 1 [Appendix – Summary of Approaches to Non-Instructed Advocacy](#)

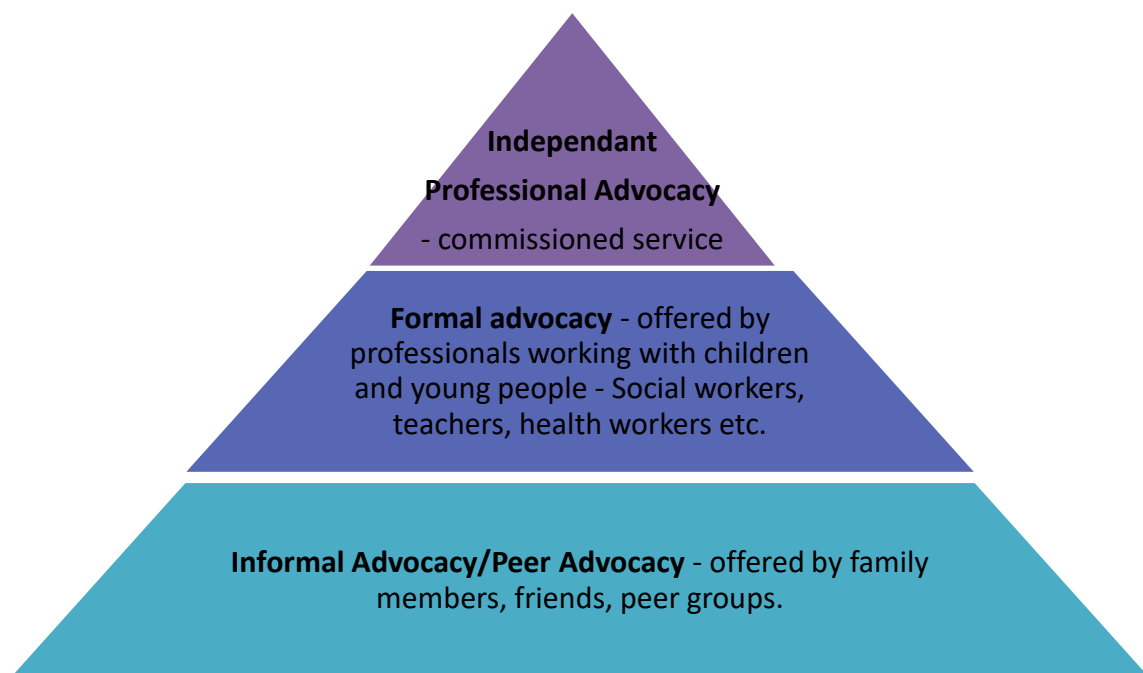
1. Definition of advocacy

Advocacy is about: speaking up for children and young people, empowering children and young people to make sure their rights are respected and their views, wishes and feelings are heard at all times, representing the views, wishes and feelings of children and young people to decision-makers, and helping them to navigate the system.

Effective advocacy is crucial if we are to safeguard children and young people and protect them from abuse and poor practice. Advocacy is about speaking up for children and young people and was a central issue of the Waterhouse report.

National Independent Advocacy Standards and Outcomes Framework for Children and Young People in Wales 2015

Advocacy operates on a number of levels, Independent Professional Advocacy, Formal Advocacy and Informal/Peer Advocacy and should be viewed as working together to form an advocacy network in support of the child or young person. Each level of advocacy has a role to play in support of a child or young person but also has its own limitations and boundaries. Recognising these limitations and boundaries will strengthen the ability of the different levels to work together, in particular the relationship between Independent Professional Advocacy and Formal Advocacy. Some children and young people are entitled to access Independent Professional Advocacy by virtue of the Social Services Wellbeing (Wales) Act 2014.



2. Independent Professional Advocacy

At the heart of advocacy is the concept of independence.

An independent advocacy service is designed to provide safeguards for children and young people and it is imperative that the advocates providing the service should be free to support them, without any conflicts of interest, and to appropriately challenge service providers on the children and young people's behalf. The subject of such challenge may be very broad and can include:

- Decisions made about a child or young person's care
- The upholding of a child or young person's legal rights
- The quality of care being provided

The role of the advocate is to support a child or young person to make an informed decision with the young person's views and wishes being their sole focus. An advocate will help a child or young person to understand his or her rights and the choices of action that are available, but ultimately, any decisions taken will be the child or young person's own.

Further information on the expectations and role of an advocate operating in pursuit of the Contract is set out in the Social Services and Well-being (Wales) Act 2014: Part 10 Code of Practice (Advocacy) Code of Practice, in particular Annex 1 therein.

Other Professionals – Formal Advocacy

Social care, education and health professionals working with children and young people all have a role in supporting young people to have a voice, to speak up for children and young people and make sure their rights are respected and their views, wishes and feelings respected and taken into consideration. Often the support provided by independent advocates will be similar to that provided by these professionals in the course of their work, but there are some important differences of approach.

These professionals owe a child or young person a legal duty of care and will use their professional judgement to assess how a child or young person is and how that might be impacting on their actions. Using this judgement, they are required to act in a child or young person's best interests. The role of the advocate however, is to support the child or young person's own views or wishes, even where these may be different to, or conflict with, the best interests of the child or young person as perceived by those professionals.

Those professionals are also required to act according to the policy and procedures of their employers. Hence they have to work within policy and financial constraints and may not be able to promote or offer what is being requested by the child or young person. For advocates to be effective they need to be able to work outside these constraints and within the framework of their own professional practice.

Managing/Supporting Independence

It is very important, therefore that the principle of independent advocacy is clearly acknowledged and supported by those procuring services and social care providers and practitioners and other professionals with whom the advocates will be working. Independence should be built into all stages of independent advocacy provision, including:

- The service level agreement entered into between the Commissioners and the advocacy provider
- The establishment of appropriate feedback arrangements so that the independent advocacy service can report both outcomes achieved as a result of service provision and concerns to the commissioners on both a regular and urgent basis, while maintaining the anonymity (where necessary) of a child or young person
- Independent advocacy service governance arrangements which reinforce the independence of its management

Independent advocacy providers should ensure that their independent status is reinforced through:

- High standards in advocacy practice as measured against the National Standards and Outcomes Framework,
- Strong partnership working with service users, professionals and commissioners,
- Publicity material and agreed confidentiality policies.

2. Outcomes

The Service must be delivered in accordance with the Independent Professional Advocacy: National Standards and Outcomes Framework for Children and Young People in Wales. The required Outcomes for the Service are therefore:-

- 1 Children and young people find good quality independent advocacy easily available and accessible.
- 2 Children and young people have their privacy and confidences respected and their wellbeing safeguarded and protected.
- 3 Children and young people are valued for their diversity, treated with respect and all forms of discrimination against them are challenged.
- 4 Children and young people are empowered to take the lead in relation to advocacy services and their rights, wishes and feelings are championed
- 5 Children and young people participate in the design, planning, delivery, monitoring and evaluation of advocacy services.

3. The Service

An Independent professional advocacy service provided to children and young people across the region which is person-centred, issue-based and outcome-focussed (“the Service”).

In delivering the Service, the Service Provider must comply with all regulations, standards, legislation, directions, code of practice, outcome framework and any amendments or replacements relevant to the Service. This includes but is not limited to:-

- The Social Services and Wellbeing (Wales) Act 2014.
- The Service is an ‘advocacy’ service for the purpose of paragraph 7(1) of Schedule 1 of the Regulation and Inspection of Social Care (Wales) Act 2016, and is accordingly a regulated service and must comply with the provisions/requirements set out within the Regulated Advocacy Service (Service Providers and Responsible Individuals) (Wales) Regulations 2019.
- Independent Professional Advocacy: National Standards and Outcomes Framework for Children and Young People in Wales.
- Social Services and Well-being (Wales) Act 2014: Part 10 Code of Practice (Advocacy).
- Statutory Guidance relating to Parts 2 to 15 of The Regulated Advocacy Services (Service Providers and Responsible Individuals) (Wales) Regulations 2019.

Other key documents:

- United Nation Convention on the Rights of the Child (UNCRC)
- The Rights of Children and Young Persons (Wales) Measure 2011
- National Children and Young People’s Participation Standards for Wales
- The Welsh Language (Wales) Measure 2011
- The Data Protection Act 2018 (the General Data Protection Regulation)

4. Eligibility

The Service must be available for the following children and young people (‘entitled child(ren)’);

- Children Looked After , or a child who is not being looked after but may have needs for care and support;
- a child in respect of whom a Special Guardianship Order is in force;
- an adopted child or a child who may be adopted;
- a young person who is a former looked after child as defined under section 176 and 104 of the Act; or
- a young person receiving and/or is eligible to receive support in accordance with section 104(2) of the Social Services and Wellbeing (Wales) Act 2014;

The Social Services and Well-being Act 2014 definition of a child in Part 1 (3) – states that “child” means a person who is aged under 18. However, it is recognised that for the purposes of the Service, very young children in the 0 – 5 years old category, need to be dealt with on a case by case basis. The Service may be appropriate dependent on the individual child, the issue/s being dealt with, and the availability/suitability of other forms of advocacy support i.e. Formal/Practitioner advocacy or Informal/Family advocacy.

5. Service Delivery

Accessibility

The Service will be contactable bilingually via telephone, text or email and will also operate a bilingual telephone answering-machine service which will operate outside of office hours. It will provide a message regarding how to get immediate help and a timescale for receiving a response from the advocacy service.

The Service will be available in Welsh and English. The Service will comply with the requirements of the Welsh Language (Wales) Measure 2011, the Welsh Language Act 1993 and the Welsh Government Guidance 'More than Just Words' promoting an active offer of Welsh in all aspects of the service delivery.

Translation/Interpretation facilities will be provided where the child's preferred/first language is not English or Welsh.

The Service Provider will ensure that it is responsive to children with additional communication needs and there is expertise available within the Service to work with children with disabilities and/or complex communication needs.

The Service Provider will provide Non-Instructed Advocacy to children and young people who are unable to instruct and direct an advocate, using one or a combination of methods described in Appendix ...

The Service will be responsive and delivered in a timely manner.

The Service will be available 52 weeks of the year and will be flexible to meet the availability of the children/young people accessing the service. This will require making the Service available outside of normal working hours including weekends and evenings.

The Service will be accessible to children and young people across the region including children looked after and young people placed by the local authorities in other parts of Wales or the UK (out-of-county placements).

The Service will be provided at various locations across the region depending on the child or young person's individual circumstances and preferences whilst ensuring confidentiality at all times. This may include visits to homes, schools, community and public venues, and the service provider will ensure that the appropriate risks and hazard assessments are completed.

How the advocate shall work with the child or young person

The Service will work openly with and exclusively for children and young people and be led by their views and wishes.

The Service will be person centred to meet the needs and preferences of the child or young person.

The Service shall provide children and young people with information about their rights by virtue of legislation, UNCRC policy etc.

The Service shall provide children and young people with the details about other sources of information, advice and assistance.

The duration of the advocacy intervention will vary depending on individual circumstances. It may be short, medium or long term dependent on the range, nature and complexity of issues (low, medium or high).

The Service shall help children and young people to explore their options for tackling the issues - including the possible outcomes of the options - and develop a child friendly, outcome focussed advocacy action plan with the child or young person which explains how the specific issue / issues will be taken forward.

The Service Provider must give children and young people timely updates on the implementation of the advocacy action plan.

The Service supports children and young people in preparing to present their views directly to decision makers – supporting their communication or assertiveness skills or preparing presentations.

The Service Provider must explain to children and young people the independent status of the Service.

Request to change advocate or to complain

The Service Provider must explain to children and young people how to request a change of advocate and have a clear, child friendly complaints policy and procedure which is explained to children and young people when they commence work and which they are reminded about as and when appropriate.

The Service shall support children and young people to complain about the advocacy service and/or the local authority and to contact the Children's Commissioner for Wales where appropriate.

Confidentiality

The Service must work to a high level of confidentiality and respect children and young people's privacy. The Service Provider must operate in line with Wales Safeguarding Procedures and consistent with Safeguarding Board procedures. The Services' confidentiality policy will be shared with and explained to the child or young person before the advocacy engagement begins, including the conditions under which a Child Protection referral must be made.

The Service shall, when needing to make a child protection referral after a disclosure, explain the situation to the child or young person, advise of the need for referral and seek consent where safe and appropriate in order to maintain the advocacy relationship.

Equality and diversity

The Service Provider must ensure no child or young person suffers discrimination within their service. The Service will be provided in a manner which treats children and young people with courtesy and respect at all times, giving due regards to the diversity, background and individual needs of children and young people particular in respect of age, disability and the cultural, religions and linguistic background of children and young people.

No barriers should exist for children and young people with protected characteristics to receive a full service. If there is a specialist need identified in terms of race, sexuality, disability or other equalities factors, the Service Provider shall seek advice from a specialist support service, and make a referral, where appropriate, for further support.

The Service ensures children and young people are aware of their rights under the law, and under equality and diversity policies held by the agencies from which they are receiving services.

Miscellaneous

The Service must keep detailed case records of work undertaken which includes the advocacy action plan, activity, issues, outcomes and feedback which the children and young people agree with and are able to access.

Advocacy services champion children's rights in their work with other professionals and adults working with children and young people.

6. Residential Visiting

The Service will provide visits by advocates to each of the local authorities' internal residential and respite units.

The service will, where specifically requested, provide Residential Visiting for Independent Providers where a number of eligible young people are placed at the same residential / respite unit.

7. Promotion/Awareness Raising

Shared understanding of advocacy across the region will be promoted. The Service will have a dissemination plan to ensure that advocacy is widely marketed using age appropriate bilingual publicity material so that children and young people are aware of

the service, understand what advocates can provide and how the service can be accessed.

The Service will establish outreach strategies for engaging with underrepresented groups of eligible children and young people.

Bilingual promotional/publicity material will be available to raise awareness with social workers, foster carers and any other person working with children and young people who are eligible to access the service. The material will be available in various formats to meet individual needs.

A minimum of four awareness raising/training sessions will be delivered annually within each local authority to groups, teams and agencies working with children and young people who are eligible to access the service, the sessions will include an explanation of the service's confidentiality policy and an introduction to the principles of advocacy (formal and informal) as well as how/when to identify the need to signpost/refer to the Independent Professional Advocacy Service.

The Service will engage with other support services working with groups of vulnerable children and young people such as 'missing children' and refugees to ensure that those services are aware of the eligibility criteria and referral processes for accessing advocacy support.

8. Active Offer and issue based advocacy

The active offer for the purposes of this Service Specification is the face to face meeting between the Provider and the Child/Young Person following initial information and the Child/Young Person's consent for the meeting. In accordance with the National Outcomes Framework, it is a statutory requirement that a Child/Young Person is eligible for an active offer meeting if:

- The Child/Young Person is entering the care system as a 'Child Looked After' (CLA)
- The Child/Young Person is entering into the child protection arena

The Child/Young Person may or may not decide that they wish to receive a Service from the IPA as a result of the active offer advocacy meeting. If the Child/Young Person agrees to receive advocacy support following an active offer meeting, the service is further defined as an issue based advocacy following a self-referral with its source noted as active offer.

Active Offer – Information

Initial Information shared by the Social Worker:-

Where a Child/Young Person is eligible to receive the active offer, initial information is shared by the Social Worker about the statutory rights and entitlements of the

Child/Young Person for independent professional advocacy service and a consent is obtained in order to facilitate an active offer meeting with the IPA.

Information shared by the IPA:-

The information shared includes an explanation about the role of the independent professional advocacy service, what it can and cannot do, how it operates based on a child or young person's views, wishes and feelings, its independence and how it works solely for the child/young person. The information that is shared also explains the service policies on confidentiality, safeguarding and the statutory right of children and young people to be supported to express their views, wishes and feelings as well as their right to make a representation or complaint.

Information shall also be shared about wider networks of support available to a child or young person including formal/practitioner advocacy (i.e. teacher, social worker, health professional), informal advocacy (a family member or carer) and peer advocacy as well as information and contact details for the MEIC Helpline and the Children's Commissioner for Wales Office.

Further information on the requirements with regards to the Active Offer are detailed within Appendix D of the National Standards and Outcomes Framework.

9. Referrals

Referrals can be made by email/telephone/face-to-face as either: -

- Direct self-referrals from individual children or young people;
- Referrals from professionals and other adults having secured the consent of the child or young person i.e. Social Workers, staff from residential homes, parents, foster carers, Independent Reviewing Officer, Child Protection Co-ordinator, Education Officers, nurses, doctors, and other professionals.
- By carers on behalf of a child or young person with disabilities/communication difficulties who is unable to give informed consent and/or who may require a non-instructed approach to advocacy (See Appendix ...)

Following referral, the first contact with the child or young person will be made within one working day; further face-to-face contact to be between three and five working days and should only be exceeded in order to respond flexibly to the child or young person's availability and convenience.

Every matter will be treated confidentially in line with the service's confidentiality and child protection policy.

The Service Provider will follow the relevant local authority processes where appropriate; for example, following the official stages in a complaints procedure. Copies of each local authority complaints procedures will be provided to the Service Provider upon contract award.

An accurate record of all referrals received will be maintained and referral activity and the application of the eligibility criteria will be made available to the commissioners as part of service performance and monitoring.

10. Staffing

The Service Provider must maintain registration with the Care Inspectorate Wales and fully comply with the expectations of the Regulation and Inspection of Social Care (Wales) Act 2016 and associated legislation and Statutory Guidance. In relation to staffing, this means Service providers must therefore have the following in place:

- underpinning policies and procedures for the recruitment of staff;
- rigorous practices for recruiting and vetting staff;
- a structure of management and staffing that supports the statement of purpose and is relevant to individuals' needs; and
- a management structure, systems and processes for induction, ongoing supervision, training and development of staff.

The Service Provider must ensure that there are sufficient staff with the required knowledge, competence, skills and qualifications to provide the Service in accordance with this Specification and in a way which meets the needs of entitled children. This includes ensuring the service is fully operational at all times. Cover for management and advocates must be provided for those who are absent from the service for four weeks or more at the expense of the provider to ensure continuity of service.

Advocates are required to have undertaken training in professional advocacy and be working towards the relevant qualifications in compliance with the requirements of the Regulation and Inspection of Social Care (Wales) Act 2016.

Registered Managers are required to have undertaken training in professional advocacy and be working towards the relevant qualifications in compliance with the requirements of the Regulation and Inspection of Social Care (Wales) Act 2016.

The Contract Supervisor will be invited to identify a Service Purchaser representative to take part in the recruitment and selection of new staff appointed by the Service Provider.

Children and Young People will be involved in the recruitment and selection process for any new staff appointed by the Service Provider.

The Service Provider will ensure that the staffing profile reflects the linguistic needs of the population regarding accessing the service through the medium of Welsh.

Staff shall have clear and detailed job descriptions and understand the structure, values, ethos, their role within the organisation and the boundaries and lines of accountability.

Advocates will have the skills and expertise to work with children with disabilities with additional communication needs including augmented communication approaches and have the necessary support and training to carry out their role effectively.

Staff will have a good understanding of both the services' anti discriminatory policy and the diverse needs of children and young people and adopt a positive approach to working with them and with professionals across the region.

Staff will be managed, supported, trained and appropriately supervised to ensure successful and smooth operation of the Service across the region. Records of staff training will be maintained and be available to the commissioners on request.

Staff providing the service will be matched suitably to the child or young person. Continuity of advocates will be ensured as far as possible according to the choice of the child/young person.

It is expected that the Service Provider will implement a lean management structure for this contract which will allow the maximum amount of resource to be allocated to direct service provision

11. Quality Assurance

It is imperative that the Service delivered by the Service Provider is of a high quality. To this end the Service Provider must:-

- Develop and maintain a Statement Of Purpose which sets out a clear organisational intent and direction for the Service and the actions the Service Provider will undertake to ensure it is delivered to a high quality.
- Put in place and implement the policies and procedures necessary to support managers and staff.
- Establish and maintain sound management structures to oversee the Service. This includes the appointment of an effective Responsible Individual to oversee the management of the service and for providing assurance that the service is safe, well run and complies with the requirements of the Contract and registration with CIW.
- Use a robust management information system which efficiently records and aggregates information on the Service and supports effective operational and management decision-making.
- Promote a culture of openness, honesty and candour at all levels of the organisation.
- Establish, maintain and implement a properly codified system for the internal monitoring of the Service ("the Quality Assurance Arrangements").

The purpose of quality assurance is to actively help ensure the Service Provider is delivering the best possible service. The Quality Assurance Arrangements shall contain information on the actions the Service Provider will undertake to proactively monitor the Service.

The Quality Assurance Arrangements shall include planned and systematic activities. All review and audit activities conducted under the Quality Assurance Arrangements should have clearly written aims and objectives and result in clearly defined and organised action plans for implementation. The Service Provider must maintain documentary evidence of how the Quality Assurance Arrangements have led to change and improvement.

The Quality Assurance Arrangements must cover a range of subject areas including:-

- How the Service is planned, delivered monitored and evaluated.
- The review of organisational policies and procedures.
- How any legal, financial and organisational responsibilities are understood and met.

The Service Provider must regularly and routinely incorporate feedback from key stakeholders as part of its Quality Assurance Arrangements. Of particular importance is the need to incorporate the views of children and young people who use the Service.

The Quality Assurance Arrangements and evidence of its implementation shall be made available to the Contract Supervisor on request.

Once a year the Service Provider shall provide the Contract Supervisor with an annual review of the Service in which they set out:

- the quality assurance activities undertaken over the past year;
- how stakeholders have been involved in this process; and
- evidence of how the above quality assurance arrangements has driven service development and improvement.

The Contract Supervisor may require the Service Provider to make reasonable changes to the Quality Assurance Arrangements where it supports the fulfilment of the Contract.

12. Participation

The Service will promote and facilitate the involvement and engagement of children and young people in order to enable them to express their views about the service and participate in the design, planning and delivery of the service including staff recruitment.

The Service Provider, when securing help from children and young people to improve the service, will take steps to ensure a representative balance of views from those using the service.

The Service Provider will undertake an annual feedback survey amongst service users as well as delivering participation and consultation sessions with children and young people on service development and improvement.

13. Review, monitoring and evaluation

The Service must maintain accurate and up-to-date performance information regarding service delivery, usage and the nature of advocacy involvement in-line with the National Reporting Tool. The current template for the National Reporting Tool can be found at Appendix .. The Service Provider shall agree to work to a revised version of the Tool where this is agreed at a national level.

The National Reporting Tool will feed into the National Performance Framework for Social Services.

The Contract Supervisor (and / or any person authorised by them) may visit the Service Providers office for the purposes of inspecting and examining records maintained by the Service Provider in relation to the Service. Such visits shall be undertaken in a manner which is aligned with the Confidentiality Policy for the Service. The Service Provider shall provide the Contract Supervisor with the reasonable facilities they require during any visit.

The Contract Supervisor (and / or delegated Officers) shall meet with a named representative of the Service Purchaser on a quarterly basis. The purposes of this meeting to include:

- a review of the delivery of the outcomes and key criteria within the Contract;
- disseminating good practice and negotiating service improvements;
- discussing the latest performance information;
- discussing key themes and issues raised by children and young people and present the case for service change (systemic advocacy);
- to discuss any complaints and compliments received by the Service; and
- any other issue that may arise from time to time in relation to the delivery of the Service.

The Contract Supervisor withholds the right to arrange additional review meetings as and when required to discuss the Service.

The Service Provider shall at all times co-operate with the reasonable processes of the Contract Supervisor for the review, monitoring and evaluation of the Service. As well as the monitoring activities already described, it is foreseeable that monitoring will include:

- feedback from children and young people;
- a review of CIW inspection reports;
- feedback from social workers and other professionals involved with supporting children and young people; and
- feedback from commissioners.

Irrespective of whether it is identified as part of the Quality Assurance Arrangements, monitoring by the Contract Supervisor or any other means, the Service Provider must not delay in taking action to address any defect or shortfall with any aspect of the Service.

The Service Provider recognises that the Service Purchaser is a public body and its decisions may be subject to scrutiny. The Service Provider therefore agrees, if requested by the Service Purchaser, to attend meetings (including scrutiny meetings with Council Members) to discuss the Service.

Summary of Approaches to Non-Instructed Advocacy

Sometimes a child or young person may be unable to instruct and direct an advocate. Where a child or young person is unable to instruct, non-instructed advocacy can be used to represent their views, wishes and feelings.

There are currently four recognised approaches to non-instructed advocacy which are briefly set out below. It is acknowledged that an integrated approach is most effective in delivering non instructed advocacy. The Service Provider may use one or a combination of approaches, dependant on their assessment of the situation and the presenting issue. However, as the advocate's role is to ensure the views, wishes and feelings of the child or young person in receipt of non-instructed advocacy are brought to the fore of decision-making processes (as is the case in all advocacy), the Rights Based Approach is generally not used in isolation.

Rights based Approach

With this approach, the role of the advocate is to ensure, using a variety of means, that the basic human rights of service users are promoted, defended and where necessary used to take affirmative action on behalf of the service user. Where the advocate believes that the injustice being done to the service user may be illegal, they should seek appropriate legal representation for the person.

Person-Centred Approach

In spending time with the service user, and maybe others who the client knows and trusts, the advocate builds up a picture of their lifestyle, preferences and needs. The advocate can independently represent the person's views 'as if they were the advocate's own' (O'Brien 1981). In doing so the advocate is raising the profile of the service user's unique perspectives, and as such is promoting a person-centred approach to service delivery and decision making.

The Watching Brief Approach

This approach centres around 8 quality of life domains which are used as the basis for a series of questions that the advocate can put to the decision maker or service provider on behalf of the service user. Watching Brief provides a framework for questioning and challenging the decision maker or service provider in a non-confrontational way and encourages service providers to put the service user at the centre of the decision making process. Using the Watching Brief model advocates have to ensure that a number of issues are clear: *The Watching Brief model was developed, and has been extensively used by [ASIST advocacy services in Staffordshire](#).*

Witness-Observer Approach

The advocate, in observing the way in which a client lives their life may see or hear things that are unacceptable or which pose a threat to the person's well being. They may also pick up on the service user's preferences and pleasures, which can in turn be used to enhance positive relationships. This approach does not require the advocate to make judgements or

assumptions, merely to report on the facts of his or her observations and bring them to the attention of service providers and decision makers.