

**Question 1: Are you content with the level of detail given in relation to the statutory responsibilities and that the information is clear?**

Yes  No

**If no, what additional information do you think should be included?**

The Lay Advisory Committee of the Royal College of Physicians of Edinburgh (“the College”) agrees that the principles are clearly stated in relation to the statutory responsibilities and welcomes the guidance as a means to increase public awareness of the advocacy services available.

4. Section 10 covers commissioning of independent advocacy. This is a much shorter section than in the previous guide as it refers to the Guidance on the procedures for Procurement of Care and Support Services given in the joint Scottish Government and COSLA guidance issued in 2010 and available at:

<http://www.scotland.gov.uk/Resource/Doc/324602/0104497.pdf>.

**Question 2: Are you content that the level of detail given in Section 10 on the Commissioning of Independent Advocacy is appropriate?**

Yes  No

**If not, why not?**

The College understands the reasons for providing a new shorter Section 10. However, it feels that it would be beneficial for the section to have a clearer structure and perhaps include key points from the joint Scottish Government and COSLA guidance in order to minimise cross referencing. It would also be useful to provide clarification that funding is for a minimum of 3 years.

The College suggests that item 10.3, line 2, ‘... the people it serves.’ should be replaced with ‘...the person receiving the service.’

5. Both commissioners and the advocacy groups have a responsibility to ensure that the advocacy being provided is of good quality and is effective. Section 12 of the guide covers Monitoring and Evaluation and mostly reflects the arrangements currently set out in the 2010

guidance. However we understand that the cost of independent evaluations is high and is not always undertaken. In relation to this we are currently exploring a pilot for evaluation of advocacy projects with the SIAA. This will involve the recruitment of independent sessional evaluators to undertake evaluations based on the Principles and Standards within this guide over an 18 month period. SIAA will facilitate the appointment and training of the evaluators. The report of the evaluation will be prepared by the evaluators and will go to the commissioners and the advocacy group. The SIAA will be in a position to offer support to the advocacy group in the event that improvements are required. An evaluation of the pilot will be conducted prior to any decision on whether to proceed with this model. The evaluations will not be restricted to SIAA member organisations.

**Question 3: Would you support a programme of evaluations based on the pilot model of evaluation set out at 5 above?**

Yes  No

**If not, why not?**

The College agrees that this seems reasonable and would support this programme of evaluations.

6. Examples of situations that can potentially cause a conflict of interest which might impact on the person receiving the advocacy support, the advocate, the advocacy organisation or a service provider have been included at Appendix 2.

**Question 4. Do you think it is useful to highlight situations (such as those given in Appendix 2) that commissioners should be mindful of in order that consideration is given to how these would be avoided/handled/resolved?**

Yes  No

**Are there any others you would add/remove?**

**We would welcome your thoughts on what the impact of each of these situations would be and also your views on what action should be taken to minimise conflict.**

The College agrees that organisations should have governance mechanisms and policies in place to address conflict of interest issues when the need arises.

The College feels that there could be other examples of situations which are not included on the list provided, and that the guidance would therefore benefit from a less prescriptive list with fewer examples.

**We will consider the responses and add as part of the guidance.**

7. The layout of the guide has been changed to provide information and direct links to a list of relevant policy and guidance documents in Appendix 3.

**Question 5: Do you find the information on additional reference material/useful links in Appendix 3 helpful?**

Yes  No

The College agrees that the information is helpful for an intended audience of Commissioners. The descriptive column, along with the links to legislation are very helpful as a reference tool (working on the assumption that the list of legislation is comprehensive).

**Are there any others you would add?**

**Are there any you would remove?**

### **General Comments**

**We would welcome any further general comments you may wish to offer here.**

The College welcomes this document, which helps to raise awareness of the advocacy services available and agrees that the guidance for Commissioners should be practical and short.

The College would also welcome evaluation of the use and uptake of advocacy services and awareness among the general public of their availability.

**We are grateful for your response. Thank you.**