



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU

APPENDIX A

Archwilydd Cyffredinol Cymru
Auditor General for Wales

Follow-up review of corporate arrangements for the safeguarding of children – **Bridgend County Borough Council**

Audit year: 2018-19

Date issued: October 2019

Document reference: 1505A2019-20



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This document is also available in Welsh.

The team who delivered the work comprised Ian Phillips and Sara-Jane Byrne under the direction of Huw Rees.

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Summary

What we reviewed and why

- 1 We undertook this review to seek assurance that the Council has effective corporate arrangements in place for safeguarding. We considered the findings of our 2014 report into the Council's arrangements to support safeguarding of children¹. We also considered the Council's progress in implementing the recommendations contained in the Auditor General's report, 'Review of Corporate Safeguarding Arrangements in Welsh Councils' (July 2015)²
- 2 We undertook the review between July and September 2019.

What we found

- 3 Our review sought to answer the question: Has the Council acted upon the recommendations and proposals for improvement contained in the national and local reports of the Auditor General published in 2014 and 2015?
- 4 Overall we found that: The Council has met, or partially met, our previous recommendations and proposals for improvement, but we have identified some further proposals for improvement to strengthen aspects of the Council's corporate safeguarding arrangements.

Proposals for Improvement

Exhibit 1: Proposals for Improvement

The table below sets out the proposals for improvement that we have identified following this review.

Proposals for improvement	
P1	<p>The Council should strengthen awareness of the roles of the lead officer and lead member for safeguarding by:</p> <ul style="list-style-type: none">• including information about the roles of the lead member and lead officer for safeguarding on the Council's safeguarding intranet pages; and• ensuring safeguarding is included in the lead member's portfolio responsibilities on the Council website.

¹ Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Bridgend County Borough Council**, October 2014

² **Auditor General for Wales, Review of Corporate Safeguarding Arrangements in Welsh Councils**, July 2015

Proposals for improvement

- P2 The Council should strengthen the Corporate Safeguarding Policy in the following ways:
- clarify the role and responsibilities of the lead member for safeguarding;
 - set out the role of scrutiny in the Council's safeguarding arrangements;
 - clarify the role of the operational corporate safeguarding board; and
 - Remove obsolete reference to safeguarding champions.
- P3 The Council should strengthen its Recruitment and Selection Managers' Guidelines in relation to safeguarding and safe recruitment. For example:
- the job descriptions section could refer to safeguarding for relevant posts;
 - specify that job adverts for posts that require a Disclosure and Barring Service (DBS) check will contain an explicit statement on safeguarding; and
 - the guidelines should cross refer to the DBS Policy and the Corporate Safeguarding Policy
- P4 The Council should update its DBS Policy to ensure it makes reference to current legislation.
- P5 The Council should ensure the consistent use of safeguarding provisions in tenders and contracts across all Directorates and ensure appropriate monitoring of such contractual provisions.
- P6 The Council should improve its approach to safeguarding training in the following ways:
- clarify when mandatory safeguarding training needs to be refreshed;
 - clarify how often safeguarding training should be offered to members; and
 - accelerate the rate of compliance with the completion of its mandatory safeguarding training.
- P7 The Council should develop a central system for recording and monitoring volunteer information, including any training records and DBS checks for volunteers, and consider producing central guidance for the recruitment of volunteers.
- P8 The Council should consider producing further performance measures (for example in respect of DBS check compliance and mandatory safeguarding training) to enhance the performance information that goes to scrutiny and aid transparency.
- P9 The Council should consider the merits of the operational corporate safeguarding group having oversight of corporate safeguarding risks from across the Council.

Assessment of progress against the recommendations from our 2015 report

The Council has met, or partially met our previous recommendations and proposals for improvement, but we have identified some further proposals for improvement to strengthen aspects of the Council's corporate safeguarding arrangements

Exhibit 2: recommendations from our 2015 report and our assessment of progress against them

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
R1 Improve corporate leadership and comply with the Welsh Government policy on safeguarding through:	
<ul style="list-style-type: none">the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements;	Met: This role is the responsibility of the Corporate Director for Social Services and Wellbeing.

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<ul style="list-style-type: none"> the appointment of a lead member for safeguarding; and 	<p>Met:</p> <p>This role is the responsibility of the Cabinet Member for Social Services and Early Help.</p>
<ul style="list-style-type: none"> regularly disseminating and updating information on these appointments to all staff and stakeholders. 	<p>Partially met with proposals for improvement identified:</p> <p>The Council has internal mechanisms for disseminating corporate information such as the 'Bridgend' emails and newsletters. The Council stated that information about the respective roles of the lead member and lead officer for safeguarding has been disseminated via such internal mechanisms.</p> <p>The role of the Corporate Director for Social Services and Wellbeing is set out in the Corporate Safeguarding Policy, but the role of the lead member responsible for safeguarding is not in that policy.</p> <p>The portfolio information on the Council website for the Cabinet Member for Social Services does not include safeguarding as one of his responsibilities.</p> <p>The Council has produced corporate safeguarding intranet pages but they do not set out the respective roles of the lead officer and lead member for corporate safeguarding.</p> <p>The Council has an operational corporate safeguarding board with an officer from every Directorate on that board. We understand the role of the Board is to help to ensure everyone in the Council is aware of safeguarding matters. However, we feel there is scope to clarify the role of the Board and have included a related proposal for improvement (PFI 2). The Council recognise that it is more challenging to disseminate information to those staff who do not have access to a computer and there is an expectation that managers will be the conduit for such information to those staff. The Council may wish to consider opportunities to further the awareness of key safeguarding roles amongst staff who do not have access to a computer.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p>R2 Ensure there is a corporate-wide policy on safeguarding covering all council services to provide a clear strategic direction and clear lines of accountability across the council</p>	<p>Met with proposals for improvement identified:</p> <p>The Council has a corporate safeguarding policy that is published on the Council website and it is clear on individuals' roles and responsibilities (apart from the aforementioned omission of information about the role of the relevant Cabinet Member).</p> <p>The policy is generally comprehensive and includes information on relevant safeguarding topics, such as modern slavery and human trafficking and child sexual exploitation.</p> <p>However, the policy is silent on the roles of the operational corporate safeguarding board and scrutiny in the Council's safeguarding arrangements. The policy also refers to safeguarding champions but those roles are now obsolete.</p>
<p>R3 Strengthen safe recruitment of staff and volunteers by:</p>	
<ul style="list-style-type: none"> ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children; 	<p>Met but with a proposal for improvements identified:</p> <p>The Council has a DBS policy that applies to all staff and volunteers. However, the policy was last updated in March 2014 and needs to be updated as it contains an outdated reference to legislation (Data Protection Act 1998).</p> <p>The Council monitors compliance with DBS checks.</p> <p>The Council has a Recruitment and Selection Protocol and Recruitment and Selection Managers' Guidelines. However, those guidelines could be strengthened as set out in P3 above. Volunteers are recruited by</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>Directorates and the Council does not have central guidance for the recruitment of volunteers and should consider producing such guidance in order to provide consistency of approach and increased corporate oversight.</p> <p>Although elected members are not required to have DBS checks per se, the Council offered members the opportunity to have a DBS check. Officers informed us that the majority of members took up this opportunity.</p>
<ul style="list-style-type: none"> creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and 	<p>Partially met with a proposal for improvement identified:</p> <p>The Council has a system, Trent, that captures DBS information for all staff who are required to be DBS checked. However, the Council does not have a central compliance record for volunteers' DBS check information.</p>
<ul style="list-style-type: none"> requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement. 	<p>Met but with proposals for improvement identified:</p> <p>The Council has provided us with contractual examples that are clear on the need for DBS checks to be carried out.</p> <p>The Council also provided us with an example of a tender as part of our review (for the Provision of Transport Services for the Education and Family Support Directorate). We found some weaknesses in this tender document regarding safeguarding. For example, there is no specific reference to safeguarding in this document although it is clear on DBS check requirements. The document also refers to persons engaged by the supplier completing 'the required training' but it doesn't specify if that is referring to safeguarding training or not. The document does not refer to the provider needing to have their own safeguarding policy consistent with the Council's</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>Corporate Safeguarding Policy or them having one of their own. The document is silent on drivers or escorts raising safeguarding concerns (albeit there is a duty to protect pupils from abuse and bullying).</p> <p>Internal Audit carried out a safeguarding review in 2018-19 and found a similar issue. The Internal Audit review states 'The Auditor also obtained a copy of the tender for school transport (taxi's & minibuses). Whilst DBS checks and adequate training were incorporated into this document, there was no specific reference to safeguarding'. The review also states 'Safeguarding tends to only be incorporated into contracts such as Social Care, School Transport, live in carers etc.' The review recommended that 'Consideration should be given to incorporate Safeguarding into all documentation'. The Council needs to ensure the consistent use of safeguarding provisions, where appropriate, in contracts across all Directorates.</p> <p>Interviewees we spoke to were clear that the Council checks, whether safeguarding provisions of contracts relating to Social Care have been adhered to. However, similar assurance was not received for safeguarding provisions of contracts in other Directorates. While such contract monitoring needs to be proportionate, there is scope for a more consistent Council-wide approach to this matter.</p> <p>There may be a role for the operational corporate safeguarding board to check and monitor that there is consistent application of safeguarding provisions within tender documents and contracts across all Directorates.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p>R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p>	
<ul style="list-style-type: none"> ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes; 	<p>Met but with proposals for improvement identified:</p> <p>Safeguarding training is mandatory for all staff and is available via e-learning or as a hardcopy workbook. It is included as part of the induction programme. However, the Council has not yet specified a period (for example two or three years) after which safeguarding refresher training should be completed. As at the end of July 2019, the completion rate of the mandatory safeguarding training was 65.3% of staff. Although the Council has various mechanisms in place to ensure mandatory training is completed, such as running quarterly compliance reports for managers and monitoring completion through the appraisals process, it is clear that further work is needed to obtain full compliance with this training.</p> <p>It is a Welsh Government requirement that Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) training is mandatory for all staff. The latest figure is that 83% of staff have completed this training.</p> <p>Safeguarding training was offered to all members in September 2017 but officers we spoke to said take up was 'not high' although exact attendance figures were not given. The Council may wish to consider ways in which it can improve member take up of safeguarding training, albeit it is not mandatory training. The Council should also decide how often it should offer safeguarding training to members, either as a refresher for those members who have previously had the training, or otherwise to improve the number of members completing the training.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>The Council has proactively offered safeguarding training to taxi drivers and plans to run further sessions. The Council has also provided safeguarding information to those working in the night time economy.</p> <p>The Council provides non-mandatory safeguarding training to staff, for example on topics such as modern slavery and county lines.</p> <p>The Council's Vulnerable Groups Team provides safeguarding training within schools in addition to the mandatory safeguarding training.</p>
<ul style="list-style-type: none"> • creating a corporate-wide system to identify, track and monitor compliance on attending safeguarding training in all council departments, elected members, schools, governors and volunteers; and 	<p>Partially met with a proposal for improvement identified:</p> <p>The Council's corporate safeguarding policy states that 'All line managers are responsible for ensuring that their staff, volunteers and individuals undertaking work placements have appropriate safeguarding training'. The Council has a system, Trent, that captures the mandatory safeguarding training compliance information for all staff, including schools' staff and members. HR manage the work experience process and people undertaking work experience are expected to complete the mandatory e-learning safeguarding training. However, the Council does not have a central record of volunteers' compliance with safeguarding training.</p> <p>The Council may wish to consider making more consistent use of the Trent system to capture safeguarding training information (beyond the mandatory training) that Directorates have carried out.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	Governor training is not mandated at a national level, but the Council encourages governors to complete safeguarding training and provides various opportunities for them to do so. The Governor Support team retains records for all governor training.
<ul style="list-style-type: none"> requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and young people to undertake safeguarding training. 	<p>Partially met with a proposal for improvement identified:</p> <p>The Council provided us with contractual examples that specify the requirements for safeguarding training, although the narrative set out above in respect of the third bullet point of R3 is relevant to this recommendation.</p>
<p>R6³ Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and council-wide set of performance information covering:</p> <ul style="list-style-type: none"> benchmarking and comparisons with others; conclusions of internal and external audit/inspection reviews; service-based performance data; key personnel data such as safeguarding training, and DBS recruitment checks; the performance of contractors and commissioned services on compliance 	<p>Partially met with a proposal for improvement identified:</p> <p>An annual safeguarding report does go to scrutiny. It is primarily focused on reporting on safeguarding matters in relation to Children's and Adults services although it does also cover wider corporate safeguarding issues, such as reporting compliance against the mandatory Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) training. However, there is scope to develop the annual report to include further Council-wide performance information such as information in respect of mandatory safeguarding training or DBS checks and the key findings from any relevant internal or external audit reports that relate to corporate safeguarding.</p>

³ Welsh Government were responsible for responding to recommendation 5 so that is not included above

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
with council safeguarding responsibilities.	
<p>R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p>	<p>Met:</p> <p>Internal Audit did a report on corporate safeguarding in 2016-17. They also did a Safeguarding Review in 2018-19 and a report on Safer Recruitment in 2018-19.</p> <p>Safeguarding features on Internal Audit's audit plan for 2019-20 and the review will include an annual assessment of the Council's overall operating model for safeguarding, including reviewing the adequacy of assurances obtained by the Council in respect of safeguarding arrangements in place for vulnerable adults and children.</p>
<p>R8 Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council.</p>	<p>Partially met with a proposal for improvement identified:</p> <p>Safeguarding features as a risk on the Corporate Risk Register.</p> <p>Safeguarding features as a Directorate level risk in the Social Services and Wellbeing Directorate Business Plan 2019-20.</p> <p>Safeguarding does not feature as a Directorate level risk in any of the other Directorate Business Plans for 2019-20. This includes the Education and Family Support Business Plan, although we were informed that there are Group Plans and Team Plans sitting underneath the Directorate Business Plan. The Vulnerable Groups team was cited as an example of a team that would have a strong focus on safeguarding. In March 2019 Estyn reported that 'The local authority's arrangements for safeguarding in education provision are appropriate and do not raise any cause for concern'.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	While it is not always strictly necessary or proportionate for safeguarding to feature on every Directorate Business Plan, the Council should consider using the mechanism of the operational corporate safeguarding board to ensure consistent oversight and robust consideration of corporate safeguarding risks across all Directorates and services.

Assessment of progress against the proposals for improvement from our 2014 local report

Exhibit 2: proposals for improvement from our local 2014 report and our assessment of progress against them

Proposal for improvement in our 2014 local report issued to the Council in October 2014.	Wales Audit Office assessment of Council's progress
P1 Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding.	Met with proposals for improvement identified: See narrative against recommendation 2 on page 8 above.
P2 Complete the Social Care Strategic Improvement Board review of performance	Met:

Proposal for improvement in our 2014 local report issued to the Council in October 2014.	Wales Audit Office assessment of Council's progress
information and produce measures that provide adequate assurance that systems are working effectively.	It should be noted that the reference to the Social Care Strategic Improvement Board is obsolete as that Board no longer exists. However, a number of different mechanisms are currently in place to consider performance information within Social Care. These include the Corporate Performance Assessment process and various Managers' meeting groups within Social Care. The evidence suggests that these mechanisms and the measures considered at them relating to safeguarding are appropriate.
P3 Ensure that the corporate induction programme for all new staff includes training on safeguarding and child protection issues and the Council's corporate policy on safeguarding.	Met: The mandatory safeguarding e-learning training is part of the Council's induction framework and the training can also be accessed via hardcopy workbook. There is a link to the Council's corporate safeguarding policy as part of the e-learning and there is a note on the hardcopy workbook. Managers are responsible for providing access to a hard copy of the policy should that be required.
P4 Identify and agree an appropriate internal audit programme of work for safeguarding.	Met: See narrative against recommendation 7 on page 14 above.

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