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Follow-up review of corporate arrangements for the safeguarding of children – **Vale of Glamorgan Council**

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This document is also available in Welsh.

The team who delivered the work comprised Ian Phillips, Lisa McCarthy 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 children. 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 during March 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 implemented most of our previous recommendations and proposals for improvement, but some matters need further attention. We have identified some further proposals for improvement to strengthen aspects of the Council's 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 | Strengthen the Corporate Safeguarding Policy in the following ways: <ul style="list-style-type: none">• Clarify the safeguarding roles and responsibilities of the Cabinet Member for Social Care, Health and Leisure and the Member Champion for Safeguarding;• Set out the role of scrutiny in the Council's safeguarding arrangements;• Provide information on topics that have safeguarding implications such as modern day slavery, trafficking, child sexual exploitation, counter terrorism and |

¹ Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Vale of Glamorgan Council**, November 2014

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

Proposals for improvement

the risk of radicalisation, the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and self-harm.

- P2 The Council should strengthen its contractual provisions in relation to the safeguarding training requirements of third parties, to include:
- Specifying that safeguarding training is mandatory where applicable; and
 - Amending its main agency candidate checks form so that it does not just specify that safeguarding training is mandatory only for Social Care Night Workers

- P3 The Council should improve its approach to safeguarding training in the following ways:
- Take steps to ensure that the mandatory completion of Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training is accelerated;
 - Clarify when mandatory safeguarding training needs to be refreshed;
 - Accelerate the rate of compliance with the completion of its mandatory safeguarding training;
 - Consider ways in which it could extend its safeguarding training offer, for example to taxi drivers and to those working in the night time economy

- P4 The Council should consider producing further performance measures (for example in respect of safeguarding training compliance) to enhance the annual safeguarding report and aid transparency.

- P5 The Council should develop a central system for recording and monitoring volunteer information, including any training records and Disclosure and Barring Service checks for volunteers

Assessment of progress against the recommendations from our 2015 report

The Council has implemented most of our previous recommendations and proposals for improvement, but some matters need further attention. We have identified some further proposals for improvement to strengthen aspects of the Council's corporate safeguarding arrangements

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| 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: The Director of Social Services is the senior lead officer and he chairs the Corporate Safeguarding Group. |
| <ul style="list-style-type: none">the appointment of a lead member for safeguarding | Met |

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| | <p>The Cabinet Member for Social Care, Health and Leisure has safeguarding within his Cabinet portfolio and the Cabinet Member for Learning and Culture is the Member Safeguarding Champion.</p> |
| <ul style="list-style-type: none"> regularly disseminating and updating information on these appointments to all staff and stakeholders | <p>Partially met - some areas for improvement identified.</p> <ul style="list-style-type: none"> Staffnet has a corporate safeguarding page which identifies the officers with safeguarding responsibilities and the Cabinet Member for Social Care, Health and Leisure. The Council displays safeguarding posters with includes the Council's safeguarding hotline. Both the Council's Corporate Safeguarding Policy and its website are silent on the respective safeguarding roles of the Cabinet Members, and the Council's intranet (Staffnet) is silent of the role of the Member Safeguarding Champion. The Cabinet Member for Social Care, Health and Leisure is not a standing member of the Corporate Safeguarding Group and has only just started being invited to those meetings. Many Council staff do not have access to Staffnet and the safeguarding posters are obviously high level and understandably focus on the safeguarding hotline, so 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>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>We have concluded that the Council has largely met this recommendation but there is scope to improve the corporate safeguarding policy.</p> <ul style="list-style-type: none"> There is a corporate-wide policy on safeguarding and it is published on Staffnet. The policy could be strengthened by setting out the role of scrutiny in the Council's corporate safeguarding arrangements. It could also be strengthened by providing information on topics that have safeguarding implications such as those set out in the final bullet of |

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| | <p>P1 above on pages 4 and 5. In addition, it is not clear that those officers listed at Appendix A of the policy are actually the members of the Corporate Safeguarding Group.</p> <ul style="list-style-type: none"> • The Council is planning to review its corporate-wide policy to strengthen its training arrangements by introducing a 'matrix' which will map roles against the level of training required. The Council also wants to update the safeguarding language and terminology in the policy to ensure consistency with recent legislative developments. • The 2016-17 Internal Audit report on the Council's corporate safeguarding arrangements set out that the Corporate Safeguarding Group 'should ensure that employees, volunteers, and contractors without access to Staffnet are made aware of the Corporate Safeguarding Policy and relevant safeguarding procedures. The use of posters and leaflets should be utilised to achieve this'. The Council's safeguarding poster does refer to the Corporate Safeguarding Policy, but as the policy is published on Staffnet, the problem of accessing it remains and the Council needs to be able to assure itself that all its staff can easily access the Corporate Safeguarding Policy. |
| <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:</p> <ul style="list-style-type: none"> • The Council has a Safer Recruitment Policy and ensures that DBS checks are carried out where necessary. The Safer Recruitment Policy applies to staff recruitment and also to volunteers, contractors and agency workers. |
| <ul style="list-style-type: none"> • creating an integrated corporate compliance system to record and | <p>Partially met:</p> |

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| <p>monitor compliance levels on DBS checks; and</p> | <ul style="list-style-type: none"> • The Council reports performance measures in respect of compliance with the Safer Recruitment Policy and it has escalation procedures where compliance is not fully met. • The Council has a spreadsheet held by HR that contains all staff DBS check information, although volunteers' DBS check information is held separately in Directorates or schools. |
| <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.</p> <p>The Council's contractual safeguarding provisions confirm the need for DBS checks (where applicable).</p> |
| <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:</p> <ul style="list-style-type: none"> • All staff are required to complete e-learning safeguarding training. • The Council keeps records on its iDev system of completion rates for this training from 9 November 2018 onwards. • The overall completion rate for the Council is 68%, with 79% in the Environment directorate, 80% in the Learning and Skills Directorate, 60% in Social Services (60%) and 65% in the Resources directorate. The Council told us that one of the reasons for the lower take up in Social Services is that many staff within that Directorate have done a higher level of safeguarding training and the mandatory training is basic compared to that. Nevertheless, the Council have stipulated that the e-learning safeguarding training is mandatory. The Council |

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| | <p>should consider if it is efficient to make those staff who have already done advanced safeguarding training to do the basic training. Alternatively, the Council could cross reference and identify those staff who have done the higher level training which would mean they could be exempt from the basic training in order to assure itself that staff have the relevant training.</p> <ul style="list-style-type: none"> • In 2017, all elected members attended training on corporate parenting and safeguarding. • Safeguarding training is highlighted as part of the Council's corporate induction and staff are provided with a safeguarding leaflet. New starters need to complete the mandatory safeguarding training within six weeks of their start date. • It is mandatory for all managers to attend Recruitment and Selection training. The Safer Recruitment Policy is included in the pre-course study for that training. There is a safer recruitment e-learning course available, but it is not mandatory. |
| <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:</p> <ul style="list-style-type: none"> • The Council does not have a corporate-wide system to identify, track and monitor compliance on attending safeguarding training as recommended in the second bullet point of our recommendations. Although all Council staff are on the iDev system, Democratic Services monitor and manage the process of member training and the Learning and Skills Directorate monitor schools' training compliance and keep records. 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. The Council does not have a central record of volunteers' compliance with safeguarding training. |

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| | <ul style="list-style-type: none"> • It is a Welsh Government requirement that training in respect of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) is mandatory, but currently only 52% of staff have completed it. Those figures do not include schools based staff and the Council is currently liaising with Learning@Wales in order to obtain those figures. • Some councils have provided safeguarding training to taxi drivers and are planning to roll out similar training to workers in the night time economy. The Council should consider a similar approach. The Council has started to develop its safeguarding offer within its Licensing Department and is planning to develop a safeguarding guidance leaflet to be issued to all taxi drivers when they renew their licence. Alongside that booklet, the Licensing Department are in the process of updating the knowledge test, which all new drivers must pass in order to obtain a licence, to include some safeguarding questions on what signs to look out for and what to do if they have concerns for their passenger's safety. |
| <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:</p> <ul style="list-style-type: none"> • The Council could strengthen its contractual provisions in relation to the safeguarding training requirements of third parties. The Council's contractual provisions do not explicitly specify that, where applicable, safeguarding training is a requirement, rather they refer to suitably trained and qualified staff. Furthermore, currently the Council's form for checking agency staff states that safeguarding training is only mandatory for Social Care Night Workers. We feel this is too narrow a definition for those whom such training should be mandatory |

| Recommendation from the 2015 report | Wales Audit Office assessment of Council's progress |
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| <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; and • the performance of contractors and commissioned services on compliance with council safeguarding responsibilities. | <p>The Council has met aspects of this recommendation in full but others have not been fully actioned for the reasons set out below.</p> <ul style="list-style-type: none"> • The Corporate Safeguarding Annual Report goes to all the Council scrutiny committees and to Cabinet each year. This report provides an example of how safeguarding is not yet fully embedded corporately as information from one Council Directorate is absent. The Council have recognised this weakness and the next report (due in July 2019) will rectify this omission. The Council is also looking to reduce the amount of narrative in the report. The report does contain Safe Recruitment statistics which is helpful. The Council should consider producing further performance measures (for example in respect of safeguarding training) to enhance the report and transparency regarding the effectiveness of its corporate safeguarding arrangements; • The Council's 2017-18 annual report contains some safeguarding performance information and that report goes to each scrutiny committee; • The Council has recognised a gap in its monitoring and assurance arrangements in respect of safeguarding service self-assessments. The Corporate Safeguarding Group want to develop a corporate system for these self-assessments; • The Council does not include benchmarking or comparisons with others in respect of safeguarding in the reports that go to scrutiny committees, although the Council said that this was difficult as there is not an agreed set of regional performance indicators; • The performance of contractors is monitored through the Council's contract monitoring and quality assurance arrangements as opposed |

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 |
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| | to through reporting to scrutiny committees, because the Council believes public reporting of this could carry a risk of litigation. |
| R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices. | Met: <ul style="list-style-type: none"> • Internal Audit reported on corporate safeguarding in 2015-16, 2016-17 and 2017-18; • There was a 2018-19 Internal Audit report on Safer Recruitment; • Safeguarding is considered as part of Internal Audit's schools programme; • Interviewees we spoke to as part of this review all felt that safeguarding was a topic that was high on Internal Audit's agenda. |
| 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. | Met: <ul style="list-style-type: none"> • Safeguarding is a standing item on the Corporate Risk Register; • Although the Council does not have Service Risk Registers, there are Service Plans which include safeguarding risks. |

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

| Proposal for improvement in our 2014 local report issued to the Council in November 2014. | Wales Audit Office assessment of Council's progress |
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| <p>P1 Ensure that the role and responsibilities of the LADO are clarified and understood across the Council.</p> | <p>Met. The Local Authority Designated Officer (LADO) attends the Corporate Safeguarding Group, and the general consensus amongst interviewees was that this role was known about and understood. The LADO is the Operational Manager for Safeguarding and the Council's intranet safeguarding pages set out her role, albeit the term 'LADO' isn't referred to. The current LADO has been in post for fifteen months. There was recognition that prior to the current appointment, there had been various people in this post over a relatively short period of time, so there had been a degree of instability, which seems now to have been resolved.</p> |
| <p>P2 Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding and takes into account local circumstances.</p> | <p>See narrative against recommendation 2 above.</p> |
| <p>P3 Ensure all elected members and staff who come into contact with children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding.</p> | <p>See narrative against recommendation 4 above.</p> |

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