

INTERNAL AUDIT REPORT

SYSTEMS AUDIT – CORPORATE SAFEGUARDING

1. INTRODUCTION/OBJECTIVES

- 1.1. The objective of the Audit was to conduct a review of the systems in place, report upon the soundness and adequacy of the internal controls, and ensure compliance with any relevant statutory requirements and regulations in line with the Audit Plan for 2021/22.
- 1.2. This report includes an Audit Opinion and a Risk Rating Category, further details of which are contained in Appendix A.

2. SCOPE OF THE AUDIT

- 2.1. The scope of the audit was to determine the effectiveness of the internal controls utilised within the Council's undertaking of its safeguarding responsibilities with specific regard to the Council's actions taken in response to the recommendations made by Audit Wales in its 'Follow-up review of the Corporate Arrangements for the Safeguarding of Children'.
- 2.2. The audit involved confirming the current procedures with relevant staff and reviewing relevant documentation

3. BACKGROUND

- 3.1. The Council has committed to ensuring that everyone living within Blaenau Gwent is safe and protected, and the Council has statutory responsibilities to safeguard children, young people and adults at risk.
- 3.2. The responsibility to safeguard children and adults at risk from abuse is shared by everyone involved with the Council, both corporately and individually. All Council employees, Elected Members, volunteers and contractors who come into contact with children or adults at risk in the course of their duties are expected to understand their responsibility and wherever necessary, to take action to safeguard and promote their welfare.
- 3.3. The Authority has a Corporate Safeguarding Policy in place which covers all Council employees, Elected Members, volunteers and contractors. The policy covers the responsibilities of the parties involved and ensures that they are aware of their duties. The Policy reminds the parties that 'it is not the responsibility of any Council employee, Elected Member, volunteer or provider of services to investigate and determine whether abuse or neglect is actually taking place. However, it is the responsibility of the employee, Elected Member, volunteer or contractor to take the actions set out within the Policy if they are concerned that abuse or neglect may be taking place'.

4. AUDIT FINDINGS AND WEAKNESSES

- 4.1. The findings and weaknesses below are in order of risk, with the first being the highest risk.
- 4.2. The Corporate Safeguarding Policy that was approved and in place at the time of the audit was reviewed and it was evident that it was formally approved in 2017 and pre-dated the follow-up review that was completed by Audit Wales. It was therefore evident that the Policy was out of date and had not been updated in order to satisfy previous Audit Wales recommendations.

- 4.3. It was evident during the audit that a new Corporate Safeguarding Policy had been drafted however this had not yet been formally adopted by the Authority. A review of the Draft Policy identified that it had been updated to make reference to specific job titles and roles, including the roles of Designated Safeguarding Leads. Enquiries undertaken during the review identified that the Designated Safeguarding Leads and their appropriate deputies had not yet been allocated across all departments.
- 4.4. A review was undertaken of the Authority's Intranet to identify all locations and content of pages related to the topic of safeguarding. The review identified that there were a variety of locations and sources for safeguarding content within the Intranet pages, this included material produced by Adult and Children Services of Social Services and the Education Directorate. It was evident that there were a number of documents available that were out of date and had been superseded or should have been reviewed and updated. It was also evident that the lack of organisation of the safeguarding information could lead to difficulty in locating the current Corporate Safeguarding Policy.
- 4.5. The previous Audit Wales recommendation included reference to contractors and a requirement for them to be provided copy of the Corporate Safeguarding Policy prior to them commencing work in order for them to understand safeguarding roles, responsibilities and procedures. During the audit it was confirmed that the process to include the Corporate Safeguarding Policy within the general selection stage of an Invitation to Tender (ITT) which would be used to complete the contract award process, has not yet been implemented as the Corporate Safeguarding Policy has not been updated and formally adopted. It was however confirmed that safeguarding issues are considered on a project by project basis and included within the individual service specifications.
- 4.6. The Manager's Guide in respect of 'Volunteers in the Workplace' was reviewed during the audit and it was identified that there was a lack of a requirement within the guide for the collation of any kind of volunteer information centrally resulting in the inability for there to be appropriate oversight over all volunteer positions within the Authority. Therefore, it is not possible to determine that appropriate controls have been maintained in respect of determining a volunteer position's eligibility and completing a DBS check where appropriate.
- 4.7. It was confirmed during the audit, in respect of contractors, safeguarding requirements were dealt with on a project by project basis and included within the individual service specifications. It was not evident during the audit that safeguarding information, including the DBS requirements and compliance checks completed, was compiled in a centralised manner that would allow oversight over the process.
- 4.8. The Directorate-level Risk Registers of the Authority were reviewed during the audit and it was evident that safeguarding had not been included as a risk within any of the Risk Registers other than those maintained in respect of the Social Services Directorate and the Education Directorate.
- 4.9. The Draft Policy was reviewed and it was evident that it had not been updated from the current Corporate Safeguarding Policy in order to define the role of Internal Audit and the Governance and Audit Committee in relation to assuring effective operation and governance of safeguarding arrangements.
- 4.10. The Draft Policy was reviewed, and it was confirmed that it did not contain a diagram that provided an overview of the alignment of governance arrangements for Safeguarding within the Authority as formed part of a previous Audit Wales recommendation.

- 4.11. The Draft Policy was reviewed in order to determine whether the roles and responsibilities of relevant Scrutiny Committees had been identified as per part of a previous Audit Wales recommendation. It was identified that there was no specific section detailing the role of Scrutiny Committees however they are referenced within the roles and responsibilities of the individual officers, and the reports that they will receive. Similar references were already included in the current version of the policy from which the Audit Wales recommendation arose, therefore there hasn't been any further action on this recommendation for further strengthening its arrangements.

5. RISKS AND AGREED ACTIONS

Ref	Summary of Findings	Risk	Agreed Action	Client Management Comments	Person Responsible and Target Date
4.2.	The Corporate Safeguarding Policy had not been updated and approved by appropriate committee in order satisfy the Audit Wales recommendations.	High – Policy is out of date and does not satisfy requirements.	The Corporate Safeguarding Policy has been updated and approved by Committee. It has been advertised to employees and Members and is available on the Council’s Intranet and website.		Social Services SLT. Complete.
4.3.	Specific roles, such as the Designated Safeguarding Leads and their deputies, had not yet been allocated and therefore their roles and responsibilities are not currently being fulfilled as intended.	High – Responsibilities cannot be fulfilled without officers designated into specific roles as prescribed by the policy. Safeguarding responsibilities may not be completed.	Specific safeguarding roles have been designated to employees across the Council and specific training has been provided to allow them to fulfil their duties.		Corporate Safeguarding Leads. Complete.
4.4.	The Intranet contained out of date safeguarding content making it difficult to identify relevant and up to date safeguarding information and locate	High – Employees and other relevant parties may be unable to locate appropriate safeguarding information and guidance including the Corporate Safeguarding Policy.	The Intranet has been updated and the relevant safeguarding information has been located in a prominent position from the homepage. The updated Corporate Safeguarding Policy is readily available on the Intranet.		Social Services SLT. Complete.

	the current Corporate Safeguarding Policy.				
4.5.	The Corporate Safeguarding Policy had not been included as a standard item provided to contractors before their undertaking of work, instead being considered on a project-by-project basis.	High – Contractors may not be informed of their safeguarding responsibilities whilst delivering services on behalf of the Authority and therefore unable to operate in accordance with the appropriate procedures.	The Corporate Safeguarding Policy to be included as a standard item for contractors undertaking roles on behalf of the Council.		Contracting departments/ supported by the Corporate Procurement Team. Ongoing
4.6.	Oversight over the volunteer DBS process was not possible with the current policy procedures.	High – There may be a lack of evidence available to provide assurance that appropriate DBS procedures are in place for volunteers within the Authority.	A corporate volunteer register is being introduced and all departments will be responsible for collating information for their respective departments. DBS compliance information can then be compiled where relevant.		Corporate Safeguarding Leads. Complete/ Ongoing.
4.7.	Oversight over the contractor DBS process was not possible with the current procedures in place.	High – There may be a lack of evidence available to provide assurance that appropriate DBS procedures are in place for contractors of the Authority.	Contracting managers to maintain evidence of DBS verification processes undertaken with contractors and share this centrally for inclusion in performance reporting.		Corporate Safeguarding Leads. Ongoing

4.8.	Safeguarding had not been included as risks within the Directorate-level Risk Registers of any Directorates other than Social Services and Education.	High – Safeguarding risks may not be recognised and managed appropriately if they are not formally recognised within a Risk Registers of other Directorates.	Safeguarding risks to be considered and included on the Directorate-Level Risk Registers.		Individual Directorates. Upon Risk Register updates.
4.9.	The Corporate Safeguarding Policy had not been updated in order to define the role of internal audit and the Governance and Audit Committee in relation to assuring effective operation and governance of safeguarding arrangements.	Medium – Internal Audit and the Governance and Audit Committee do not have a defined role in ensuring the Authority’s safeguarding responsibilities are being achieved.	Roles of internal audit and the Governance & Audit Committee to be further refined in the Corporate Safeguarding process.		Corporate Safeguarding Leads. Ongoing
4.10.	A schematic of the governance structure in place and responsible for safeguarding was not included within the draft Corporate Safeguarding Policy.	Low – Increased difficulty for the user of the Policy to understand the governance structure in respect of safeguarding.	A graphical representation of the governance of safeguarding has been added as an appendix to the Corporate Safeguarding Policy.		Corporate Safeguarding Leads. Complete.

4.11.	The draft Corporate Safeguarding Policy did not include specific detail in respect of the role of Scrutiny Committees to the safeguarding process.	Low – Scrutiny Committees do not have a defined role in ensuring the Authority’s safeguarding responsibilities are being achieved.	The role of Scrutiny Committees to be refined within the Corporate Safeguarding Policy.		Corporate Safeguarding Leads. Ongoing
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6. CONCLUSIONS

- 6.1. The audit report is on an exception basis. Consequently, the only points made are where weaknesses have been identified. The samples chosen would not be able to cover every transaction or eventuality; therefore, reliance is placed in part on the information and explanations provided by the appropriate officers.

7. INTERNAL CONTROL STANDARD GRADING

- 7.1. In accordance with the standard gradings set out in Appendix A, the systems examined indicate that the internal controls operated in respect of the provision of safeguarding responsibilities with specific regard to the Council's actions taken in response to the recommendations made by Audit Wales are not operating as effectively as intended, control weaknesses have been identified that require appropriate action. Therefore, the grading is assessed as '**Limited Assurance**'.