

Corporate Safeguarding Follow-up – Blaenau Gwent County Borough Council

Audit year: 2021-22

Date issued: November 2022

Document reference: 3214A2022

This document has been prepared for the internal use of Blaenau Gwent County Borough Council as part of work performed/to be performed in accordance with Section 17 of the Public Audit (Wales) Act 2004, and Section 15 of the Well-being of Future Generations Act (Wales) 2015].

No responsibility is taken by the Auditor General or the staff of Audit Wales in relation to any member, director, officer or other employee in their individual capacity, or to any third party.

In the event of receiving a request for information to which this document may be relevant, attention is drawn to the Code of Practice issued under section 45 of the Freedom of Information Act 2000.

The section 45 Code sets out the practice in the handling of requests that is expected of public authorities, including consultation with relevant third parties. In relation to this document, the Auditor General for Wales and Audit Wales are relevant third parties. Any enquiries regarding disclosure or re-use of this document should be sent to Audit Wales at info.officer@audit.wales.

We welcome correspondence and telephone calls in Welsh and English. Corresponding in Welsh will not lead to delay. Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

This document is also available in Welsh.

Contents

Summary report

Summary 4

Proposals for improvement 4

Detailed report

Assessment of the Council's progress against the outstanding recommendations and proposals for improvement in our report 'Follow-up Review of Corporate Arrangements for the Safeguarding of Children' (October 2019) 6

Summary report

Summary

What we reviewed and why

- 1 In October 2019 we published a report called 'Follow-up Review of Corporate Arrangements for the Safeguarding of Children'. That report found that the Council had made limited progress in addressing our earlier recommendations and proposals for improvement around safeguarding. We found that eight of the ten national recommendations and local proposals for improvement had not been fully addressed.
- 2 In this review we looked at what progress the Council has made to address these outstanding recommendations and proposals for improvement since October 2019.
- 3 We undertook this review between May and August 2022.

What we found

- 4 We include a summary of our findings at **Exhibit 2**. Overall, we found that the pandemic further delayed the Council's response to our 2019 report. Although it has taken recent action to strengthen its corporate safeguarding arrangements, the Council has not yet fully addressed our previous recommendations.
- 5 The Council recognises the need to strengthen corporate safeguarding arrangements beyond the Social Services and Education directorates. The Council developed an action plan to address the outstanding recommendations but, due to the pandemic, most of the planned work did not begin until early 2022. As such, it was difficult for us to assess the impact of these actions as many were still underway. For example, the safeguarding self-assessments being completed by each directorate should give the Council improved understanding and oversight and enable it to target improvement actions where needed.

Proposals for improvement

Exhibit 1: further recommendations issued

In addition to the outstanding recommendations and proposals for improvement from our earlier report (October 2019), the table below sets out further recommendations that we have identified following this review.

Further recommendations

R1 The Council needs to take further action to fully comply with the recommendations in our October 2019 follow up report on corporate arrangements for safeguarding of children.

R2 The Council needs to strengthen its monitoring arrangements of third parties so it can assure itself that they comply with the Council's safeguarding policies. It should consider whether a self-assessment tool like that recently used by Council directorates can be used with third parties to better understand compliance.

Detailed report

Assessment of the Council's progress against the outstanding recommendations and proposals for improvement in our report 'Follow-up Review of Corporate Arrangements for the Safeguarding of Children' (October 2019)

Exhibit 2: outstanding recommendations and proposals for improvement from our October 2019 report and our assessment of the Council's progress against them, and further actions identified as needed

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through regularly disseminating and updating information on senior lead officer and lead member for	Recommendation partially met The current version of the Corporate Safeguarding Policy sets out the job titles, but not the names, of lead officers and members responsible for corporate safeguarding. This could make it more difficult for someone to contact the right person. At the time of	Original recommendation partially met, but further action is needed to fully address:

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<p>safeguarding appointments to all staff and stakeholders.</p> <p>Our 2019 report suggests that in addressing this recommendation, the Council should also look to:</p> <p>a) Ensure that it communicates the names and roles of lead officers and members for corporate safeguarding to all staff, volunteers, agency workers and contractors when the Corporate Safeguarding policy is revised to reflect the new senior management restructure.</p> <p>b) ensure the new designated strategic safeguarding leads and the deputy leads are fully briefed on their safeguarding roles and responsibilities.</p>	<p>our fieldwork, the Council was identifying designated safeguarding persons for each directorate. Once completed, the Council planned to update the corporate safeguarding policy accordingly and communicate the changes through team meetings and the Chief Executive's staff bulletins.</p> <p>The Corporate Safeguarding Policy is available on the Council's website and intranet. Contractors now receive the Policy as part of the tendering process, but it is not clear whether contractors and other external stakeholders are routinely notified of updates to the Policy. Responsibility for communicating changes lies with commissioning service managers and we saw no evidence of checks to ensure that this takes place.</p> <p>The Corporate Safeguarding Policy and Training Framework sets out the roles and responsibilities of those responsible for safeguarding, including safeguarding leads and the newly created 'designated safeguarding person' role. Designated safeguarding persons in each directorate will receive training on their role.</p>	<p>The Council should update the Corporate Safeguarding Policy to include:</p> <ul style="list-style-type: none"> • the recently appointed designated safeguarding persons in each directorate. • the names and contact details of key safeguarding contacts. (This could be included in an appendix to the Policy to make updates easier.) • recent changes to job titles, eg change from Managing Director to Chief Executive. <p>The Council should seek assurance that services routinely communicate changes to the Corporate Safeguarding Policy – including key contacts – to contractors, volunteers and other stakeholders not directly employed by the Council.</p>

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales’s assessment of the Council’s progress against the recommendations (as of September 2022)	Further actions needed
<p>c) strengthen the governance arrangements supporting the deputy designated strategic safeguarding leads’ network</p> <p>d) ensure that the Corporate Safeguarding Policy is easily accessible from the main Council website</p> <p>e) ensure that contractors receive the corporate safeguarding policy prior to commencing work at the Council to fully understand the corporate safeguarding</p>	<p>The Corporate Safeguarding Policy now includes a structure map setting out how the Strategic Safeguarding Leads Group fits into the wider governance arrangements for safeguarding. As noted above, the Policy includes roles and responsibilities for safeguarding within the Council.</p> <p>The Strategic Safeguarding Leads Group has reviewed its terms of reference to ensure its purpose and objectives are clear. The pandemic interrupted some of the Group’s meetings, but it continued to meet regularly and has a designated Chair and Vice Chair.</p> <p>The Corporate Safeguarding Policy, along with other safeguarding information, is now easily accessible on the Council’s website. A link on the homepage takes users directly to information on safeguarding.</p> <p>The Council has updated its procurement process so that contractors receive a copy of the Corporate Safeguarding Policy when tendering. They must agree to comply with the policy or show that their own</p>	<p>The Council should also consider whether it needs to do more work to understand if staff are sufficiently aware of and confident using the Corporate Safeguarding Policy.</p>

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales’s assessment of the Council’s progress against the recommendations (as of September 2022)	Further actions needed
<p>roles and responsibilities and procedures</p> <p>f) test employees’ awareness of the safeguarding policy and procedures, and confidence to use the policy (for example, through a staff survey).</p>	<p>policy is aligned to the Council’s in order to progress through the tendering process.</p> <p>The Council is not actively assessing employees’ awareness of safeguarding policy and procedures. It places reliance on staff:</p> <ul style="list-style-type: none"> • attending mandated safeguarding training; • receiving updates through corporate bulletins and management channels; and • accessing information and support through safeguarding leads, designated safeguarding persons and a safeguarding app installed on all Council mobile phones. <p>Whilst this gives assurance that staff have access to information on safeguarding policy and procedures, it does not assess their awareness and confidence.</p> <p>At the time of our fieldwork, all directorates were completing a corporate safeguarding self-assessment tool. The completed assessments will provide the Corporate Safeguarding Lead Group with greater oversight and identify areas which need to improve. The Council hopes the self-assessment process will</p>	

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
	also provide assurance around employee awareness of safeguarding processes but will consider using staff surveys if necessary.	
<p>R3 Strengthen safe recruitment of staff and volunteers by 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. Our 2019 report suggests that in addressing this recommendation, the Council should also look to:</p> <p>a) Ensure that its monitoring systems enable tracking of safe recruitment and DBS renewal process for agency staff, volunteers and contractors</p>	<p>Recommendation not met</p> <p>Organisational Development oversees robust arrangements for the safe recruitment and DBS renewals of staff employed directly by the Council. But information on recruitment of volunteers and staff employed by third parties is not collated or monitored centrally which hinders corporate oversight.</p> <p>Contractors are responsible for complying with the Corporate Safeguarding Policy. This includes partners in the third sector and commissioned services. The Council makes these safeguarding responsibilities clear during the procurement process and services should monitor compliance as part of ongoing contract management. But we saw no evidence of routine checks to ensure that third parties comply with safe recruitment practices.</p>	<p>The Council needs to undertake further work to gain assurance that:</p> <ul style="list-style-type: none"> • third parties comply with its safe recruitment policies; and • all volunteers are subject to DBS checks where necessary. <p>Centralised records would help provide greater oversight.</p>

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<p>b) Strengthen arrangements for monitoring that services commissioned by the Council undertake safe recruitment practices</p>	<p>The completed corporate safeguarding self-assessment tool should provide further insight as directorates must show that 'commissioned services deliver a safeguarding standard consistent with internal services.' Going forward, a similar self-assessment tool aimed at third parties may give further assurance and evidence.</p> <p>The Council sets out guidance on volunteer recruitment and management in its 'Volunteers in the Workplace' policy. But we saw no evidence of how compliance with the policy is centrally monitored or assurance gained.</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 	<p>Recommendation partially met</p> <p>Safeguarding is included in the Council's induction programme. The Council's corporate safeguarding training framework, approved by Executive Committee in March 2022, mandates safeguarding training for all staff and members. It requires everyone to complete tier 1 training and for those with relevant job roles to complete tiers 2 and 3 also. Services must identify which roles require tier 2 and 3</p>	<p>Original recommendation partially met but the Council does not yet have a corporate-wide system to identify, track and monitor compliance with safeguarding training. This makes oversight of compliance challenging. This applies to staff directly employed by the Council, as well as</p>

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<p>standard on induction programmes</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 - requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and 	<p>training. Guidance on this is available in the training framework and from safeguarding managers in Social Services, and officers we spoke to understand the criteria.</p> <p>There is no central corporate-wide system to identify, track and monitor compliance with safeguarding training. Staff access tier 1 safeguarding training electronically on the all-Wales online platform. The system records attendance and issues automated reminders for follow-up training. Tier 2 and 3 training takes place face to face. Attendance is recorded manually, and services are responsible for maintaining their own records and ensuring compliance. The lack of a corporate-wide system makes it difficult to gain oversight of compliance. It is also unclear if services are routinely monitoring whether contractors and volunteers are complying with training requirements.</p> <p>Prospective providers of commissioned services receive details of the Council's safeguarding policy and training requirements during the procurement</p>	<p>volunteers and those employed by third parties.</p>

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<p>young people to undertake safeguarding training.</p> <p>Our 2019 report suggests that in addressing this recommendation, the Council should also look to:</p> <ul style="list-style-type: none"> a) include the Corporate Safeguarding Policy, safeguarding roles and responsibilities and safeguarding training in the corporate induction programme b) ensure consistent recording of all staff safeguarding training to enable refresher training to be undertaken in a timely manner c) agree a minimum timescale within which staff, volunteers and contractors undertake basic initial training upon appointment 	<p>process. They must agree to meet the Council's requirements to continue through the tender process.</p> <p>The corporate induction programme includes the Corporate Safeguarding Policy, which sets out safeguarding roles and responsibilities.</p> <p>Tier 1 training takes place electronically and the All-Wales Portal records attendance and issues reminders when refresher training is due. The Council keeps manual records for higher levels of safeguarding training. Designated Safeguarding Persons are now responsible for keeping records and ensuring that staff attend training when due.</p> <p>The Council's safeguarding training framework clearly sets out expected timescales for undertaking training:</p> <ul style="list-style-type: none"> • tier 1 training to be completed as part of the induction with refresher training every 3 years. 	

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
	<ul style="list-style-type: none"> • tier 2 and 3 training should be completed within 6 months of starting employment and completion of the tier 1 training and repeated every 3 years. 	
<p>R6¹ 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; - service-based performance data; - key personnel data such as safeguarding training, and DBS recruitment checks; and 	<p>Recommendation partially met</p> <p>The People Scrutiny committee is responsible for scrutinising safeguarding performance, reviewing quarterly Organisation Development reports and the Performance and Safeguarding reports.</p> <p>The Council has broadened the scope of its safeguarding performance reporting and the most recent report (April – September 2021) includes some information on corporate safeguarding. The Council recognises it needs to do more and work is underway to address some of the gaps. For example:</p> <ul style="list-style-type: none"> • The latest safeguarding performance report does not include benchmarking or comparisons with 	<p>The Council needs to take further action to fully address this recommendation. The Council should further develop its corporate safeguarding reporting by including:</p> <ul style="list-style-type: none"> • benchmarking and comparisons with others, using the regional performance measures currently being developed; • data on attendance at mandated safeguarding training; and

¹ Also covers Proposal for Improvement 2: Strengthen performance and risk management by regularly reporting conclusions from all department safeguarding activity to relevant forums to strengthen oversight and scrutiny.

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<ul style="list-style-type: none"> - the performance of contractors and commissioned services on compliance with council safeguarding responsibilities. <p>Our 2019 report suggests that in addressing this recommendation the Council should also look to:</p> <ul style="list-style-type: none"> a) ensure safeguarding reports include performance information, DBS compliance and attendance levels at safeguarding training b) ensure the reporting of safeguarding issues and risks across all Council directorates, partners, volunteers and third parties delivering services on behalf of the Council 	<p>others. Gwent councils are currently working together to develop a standard set of corporate safeguarding performance measures. When finished, this will help the Council benchmark its performance against other councils in the Gwent region.</p> <ul style="list-style-type: none"> • There is limited service-based performance data outside of Education and Social Services. The safeguarding self-assessment underway at the time of our fieldwork will provide baseline data for other services on which to base future performance reporting. The regional work on performance measures will also contribute to this. • The latest safeguarding performance report includes information on DBS compliance and attendance at Violence Against Women, Domestic Abuse and Sexual Violence training. But reports lack data on attendance levels for the level 1 safeguarding training that all staff should attend. • The report has no information on how contractors and commissioned services perform against safeguarding responsibilities. The Council needs to 	<ul style="list-style-type: none"> • safeguarding performance data for: <ul style="list-style-type: none"> – all directorates; – volunteers; and – staff employed by third parties.

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
	<p>collect performance data from third parties to assure itself that they comply with its safeguarding policies.</p>	
<p>R7² Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p> <p>Our 2019 report suggests that in addressing this recommendation the Council should also look to:</p> <ul style="list-style-type: none"> a) clarify the role of Internal Audit and Audit Committee in relation to assuring the effective operation and governance of Corporate Safeguarding arrangements, including 	<p>Recommendation partially met</p> <p>Internal Audit takes a risk-based approach to its audit planning. It has a five-year strategic plan which it updates annually by risk assessing each potential audit area, including safeguarding, using a risk matrix. This process led to internal audit including corporate safeguarding in its 2021-22 programme of work.</p> <p>The updated Corporate Safeguarding Policy includes a diagram setting out the Council's governance structure for corporate safeguarding. This includes the Governance and Audit Committee but there is no narrative to explain the role of the committee. Nor does the Policy clarify the role of Internal Audit in relation to safeguarding.</p>	<p>To fully address this recommendation the Council should update its Corporate Safeguarding Policy to explain the roles of Internal Audit and the Governance and Audit Committee in relation to corporate safeguarding.</p>

² Also covers Proposal for Improvement 3: Include safeguarding within the internal audit programme to strengthen accountability and challenge.

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<p>within the Corporate Safeguarding Policy</p> <p>b) ensure that relevant information and insight from Internal Audit's programme of work are shared and feed into the Council's oversight and assurance framework for safeguarding including with the Corporate Safeguarding Board</p>	<p>Internal audit issued a draft report on corporate safeguarding in March 2022. The audit considered 'the effectiveness of the internal controls operating in respect of safeguarding, with specific regard to the response made to the recommendations of Audit Wales.' The report provided limited assurance and will be considered by the Corporate Safeguarding Leads Group at their September meeting. At the time of our fieldwork, the Governance and Audit committee had not yet received the report.</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>Our 2019 report suggests that in addressing this recommendation the Council should also look to:</p>	<p>Recommendation partially met</p> <p>Safeguarding features on the Council's corporate risk register and on the Social Services and Education Directorate risk registers.</p> <p>At the time of our fieldwork, all services were completing a safeguarding self-assessment which</p>	<p>To fully address this recommendation the Council should continue with its plans to collate the safeguarding risks identified during the self-assessment process and use these to inform service risk registers.</p>

Proposals for Improvement / recommendations outstanding in our October 2019 report	Audit Wales's assessment of the Council's progress against the recommendations (as of September 2022)	Further actions needed
<p>a) consider safeguarding risks in services other than Social Services and Education</p>	<p>involves assessing risks in relation to safeguarding. The results of the self-assessment will be collated and considered corporately and will provide improved overview of safeguarding risks across all areas of the Council. Identified risks will also be incorporated into service risk registers.</p>	



Audit Wales
24 Cathedral Road
Cardiff CF11 9LJ

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone: 029 2032 0660

E-mail: info@audit.wales

Website: www.audit.wales

We welcome correspondence and telephone calls in Welsh and English.
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.