

## Management Response – WAO Follow-up review of Corporate Arrangements for the Safeguarding of Children

Document Reference: 1521A2019-20

Date Issued: 10/10/19

Ref	Original Proposal for Improvement	Additional Areas from the WAO	Actions to take forward	Completion Date	Responsible Officer
R1	<p><b>Partially Met</b></p> <p>Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ul style="list-style-type: none"> <li>the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements;</li> <li>the appointment of a lead member for safeguarding; and</li> <li>Regularly disseminating and updating information on these appointments to all staff and stakeholders.</li> </ul>	<p>In addressing this recommendation, the Council should also look to:</p> <ul style="list-style-type: none"> <li>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;</li> <li>ensure the new designated strategic safeguarding leads and the deputy leads are fully briefed on their safeguarding roles and responsibilities;</li> <li>strengthen the governance arrangements supporting the deputy designated strategic safeguarding leads' network;</li> <li>ensure that the Corporate Safeguarding Policy is easily accessible from the main Council website;</li> <li>ensure that contractors receive the corporate safeguarding policy prior to commencing work at the Council to fully understand the corporate safeguarding roles and responsibilities and procedures; and</li> <li>test employees' awareness of the safeguarding policy and procedures, and confidence to use the policy (for example, through a staff survey).</li> </ul>	<p><b>1. Corporate Safeguarding Policy:</b></p> <ul style="list-style-type: none"> <li>Update the Policy</li> <li>Update the structure</li> <li>Include updated information from the All Wales Policy</li> <li>When adopted in April 2020, include information from the All Wales Safeguarding Procedures</li> </ul>	April 2020	Alison Ramshaw (Corporate Safeguarding Group)
			<p><b>2. Development of a terms of reference for the Corporate Safeguarding Group (via a diagram)</b></p>	January 2020	Alison Ramshaw (Corporate Safeguarding Group)
			<p><b>3. All Wales Policy App:</b></p> <ul style="list-style-type: none"> <li>Request for work mobile phones to be able to receive the All Wales Policy App</li> <li>Identify who needs the app</li> </ul>	Feb 2020  March 2020	Lee Williams  Alison Ramshaw (Corporate Safeguarding Group) Sean Scannell
			<ul style="list-style-type: none"> <li>Include App on Intranet, MD Message and Managers Brief</li> </ul>	March 2020	
			<p><b>4. Include Corporate Safeguarding Policy and Information on front page of Intranet and Internet highlighting everyone's responsibilities with safeguarding</b></p>	January 2020	Sean Scannell
			<p><b>5. Identify a safeguarding lead for each directorate at Wider CLT and a supporting officer beneath this level</b></p>	January 2020	Damien McCann
			<p><b>6. (i) Include the Corporate Safeguarding Policy into the paperwork for contractors (above £75k). (ii) Include in the Contract Procedural Rules (above £25k)</b></p> <p>For both state that 'there is an expectation to follow the Corporate Safeguarding Policy' and include a requirement for a signature.</p>	April 2020  April 2020	Lee Williams
			<p><b>7. Include safeguarding in the Leadership Development Programme</b></p>	April 2020	Andrea Prosser
			<p><b>8. Raise the profile and importance of safeguarding in Safeguarding Week (November each year), include scenario based information and a small quiz for staff</b></p>	November 2020	Damien McCann

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R1	Continued...		9. 7 minute Safeguarding briefing to be provided to staff for awareness raising	April 2020	Sean Scannell
			Include safeguarding as a question in the bi annual staff survey	July 2021	Andrea Prosser
R2	<b>Fully Met</b> 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.	The Council could consider the following options to further strengthen its arrangements: <ul style="list-style-type: none"> <li>• The Safeguarding Policy outlines the governance arrangements for Safeguarding and the individual role and responsibilities of key senior officers as well as the South East Wales Safeguarding Children's Board and Gwent-wide Adult Safeguarding Board. Presenting this information in a schematic would improve clarity of how the individuals and groups align; and</li> <li>• Setting out the role of the Joint Safeguarding Scrutiny Committee and the role of individual scrutiny committees in the Safeguarding policy.</li> </ul>	<p>1. As identified in R1, the Corporate Safeguarding Group to develop a diagram as part of the Corporate Safeguarding Policy to identify responsibilities and arrangements.</p> <p>2. Development of options for Scrutiny Committees moving forward:</p> <ul style="list-style-type: none"> <li>• Broaden the remit of Corporate Overview to include Corporate Safeguarding; or</li> <li>• Development of a whole Joint Safeguarding Scrutiny Committee (replacing the current Joint Education and Learning and Social Services Safeguarding Scrutiny Committee)</li> </ul>	<p>March 2020</p> <p>For AGM May 2020</p>	<p>Lee McDonald and Alison Ramshaw (Corporate Safeguarding Group)</p> <p>Gemma Wasley</p>

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R3	<b>Partially Met</b> Strengthen safe recruitment of staff and volunteers by: <ul style="list-style-type: none"> <li>ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;</li> <li>creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and</li> <li>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.</li> </ul>	In addressing this recommendation, the Council should also look to: <ul style="list-style-type: none"> <li>ensure that its monitoring systems enable tracking of safe recruitment and DBS renewal process for agency staff, volunteers and contractors; and</li> <li>strengthen arrangements for monitoring that services commissioned by the Council undertake safe recruitment practices.</li> </ul>	1. Development of a Corporate Policy for volunteers	September 2020	Andrea Prosser
			2. • Include in recruitment contracts about DBS requirements; • Reminder information on DBS and renewals to be provided to contractors; • Check list questions to be developed for contractors.	This is already considered as part of procurement & commissioning strategies for contractors and agency staff  Need to ensure this references volunteers should they use them	Lee Williams / All Contract Managers
			3. Identify the contractors who would most require a DBS check	April 2020	Lee Williams and Damien McCann
			4. Every 2 years undertake a 'spot check' of contractors and compliance with DBS	May 2020 AGM	Internal Audit
			5 Include in contract compliance meetings to discuss DBS and renewals, including monitoring safeguarding compliance	April 2020	All Contract Managers
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R4	<b>Not Met</b> Ensure all relevant staff, members and partners understand their safeguarding responsibilities by: <ul style="list-style-type: none"> <li>ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;</li> <li>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</li> <li>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.</li> </ul>	In addressing this recommendation, the Council should also look to: <ul style="list-style-type: none"> <li>include the Corporate Safeguarding Policy, safeguarding roles and responsibilities and safeguarding training in the corporate induction programme;</li> <li>ensure consistent recording of all staff safeguarding training to enable refresher training to be undertaken in a timely manner; and</li> <li>agree a minimum timescale within which staff, volunteers and contractors undertake basic initial training upon appointment.</li> </ul>	1. A training needs analysis needs to be undertaken to determine what level of training is required by each member of staff. A rolling training programme will then be developed on a 3 yearly basis.	April 2020	Andrea Prosser and Alison Ramshaw
			2. Consider e-learning - what is already available from Health and Social Care Wales and Academy Wales	April 2020	Andrea Prosser
			3. Review of the Corporate Induction Checklist – Simon is reviewing this (Andrea Prosser)	Completed	Andrea Prosser and Simon Green
			4. Categorise contractors who will need to undertake training – DBS / Level 1 / or more	April 2020	Lee Williams and Damien McCann
			5. Director to speak to Gwent Directors on their findings and actions.	Complete	Damien McCann

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R6	<b>Partially Met</b> 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: <ul style="list-style-type: none"> <li>• benchmarking and comparisons with others;</li> <li>• conclusions of internal and external audit/inspection reviews;</li> <li>• service-based performance data;</li> <li>• key personnel data such as safeguarding training, and DBS recruitment checks; and</li> <li>• the performance of contractors and commissioned services on compliance with council safeguarding responsibilities.</li> </ul>	In addressing this recommendation, the Council should also look to: <ul style="list-style-type: none"> <li>• ensure safeguarding reports include performance information, DBS compliance and attendance levels at safeguarding training; and</li> <li>• ensure the reporting of safeguarding issues and risks across all Council directorates, partners, volunteers and third parties delivering services on behalf of the Council.</li> </ul>	1. Performance Reporting to include DBS compliance, training, risks and issues: Corporate Safeguarding group has performance information DBS Compliance is undertaken by OD	Implement following decision in R2 above	Performance Team liaise with Corporate Safeguarding Group and OD
			2. Baseline of training – delivered strategically Education and Social Services and then plan to go to all directorates.	April 2020 onwards	see R4 1.
			3. Approach EAS to include mandatory safeguarding as part of Governor training. To be checked annually	April 2020	Damien McCann and Lynette Jones
R7 and PF13	<b>Partially Met</b> Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices Include safeguarding within the internal audit programme to strengthen accountability and challenge.	In addressing this recommendation, the Council should also look to:  clarify the role of Internal Audit and Audit Committee in relation to assuring the effective operation and governance of Corporate Safeguarding arrangements, including within the Corporate Safeguarding Policy; and 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.	1. Discussion with Internal Audit to include Safeguarding in the programme for Internal	May AGM	Damien McCann and Louise Rosser
			2. Include the safeguarding audit information onto the relevant Scrutiny Forward Work Programme and Audit Forward Work Programme.	May AGM	Louise Rosser and Gemma Wasley

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R8	<b><u>Partially Met</u></b> 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.	In addressing this recommendation, the Council should also look to:  consider safeguarding risks in services other than Social Services and Education.	1. Linked to R2 action re safeguarding into Scrutiny Committee – risk from all areas to be reported into this committee.	For AGM and new cycle	Gemma Wasley