



Report of the Cabinet Member - Adult Social Care & Community Health Services

Governance & Audit Committee - 13 July 2021

Audit Wales - Follow Up Review of Corporate Safeguarding Arrangements - Children in Swansea Council

Purpose	<ul style="list-style-type: none"> • To provide an overview of the WAO report and recommendations, in relation to safeguarding children • To highlight improvement actions taken by Corporate Safeguarding group to address recommendations.
Content	<p>This report includes a summary of the background to this follow up review carried out last year, and the approach used by Audit Wales in producing their report published in Feb. 2020.</p> <p>This report sets out a summary of how Swansea is responding to the Audit Wales report's recommendations, and where progress is being made against the areas of improvement needed.</p>
Councillors are being asked to	For Information.
Lead Councillor(s)	Cabinet Member – Adult Social Care and Community Health Services Cllr Mark Child -Also Corporate Safeguarding lead
Lead Officer(s)	David Howes, Director of Social Services
Report Author	Simon Jones, Social Services Strategic Performance & Improvement Officer, Corporate Strategic Delivery Unit: simon.jones@swansea.gov.uk tel. 01792 637559

1. Background

- 1.1 In February 2020, the Welsh Audit Office (WAO), now called Audit Wales, published a report “Follow-up review of corporate arrangements for the safeguarding of children – City and County of Swansea”. The report was the product of a local review carried out in September 2019.
- 1.2 The main question for the study was: “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? “. The review was carried out to seek assurance that the Council has effective corporate arrangements in place for safeguarding children
- 1.3 The review took into account the findings of the first review of the Council’s corporate arrangements to support safeguarding of children, which took place in 2013/14. It considered the Council’s progress in implementing the set of recommendations contained in the Auditor General’s report, ‘Review of Corporate Safeguarding Arrangements in Welsh Councils’ (July 2015).
- 1.4 The next section looks at how Swansea Council has taken on these recommendations, and the arrangements we currently have in place to effectively safeguarding our most vulnerable children and young people.

2. Context

2.1 **What is Corporate safeguarding?** Safeguarding used to be only associated with educational establishments or social care environments that care for children. However, every organisation or service has employees or business partners who may directly or indirectly engage with children or vulnerable adults or families either in their place of work , or within the community. Corporate Safeguarding provides a policy and operational framework to ensure all of the Council’s workforce and those people who work on our behalf are clear on their obligations to safeguard children and adults at risk.

2.2 Safeguarding as Everyone’s Business.

Our corporate safeguarding policy promotes “a “Safeguarding as everyone’s business” approach, and this applies to

- our employees
- elected members
- volunteers
- contractors (specific conditions may also apply within contracts)

2.3 **The Council’s Corporate Safeguarding policy** – the policy aims to ensure that all Council policies and practices are consistent, and in line with stated values, which must underpin all work with our most vulnerable children, young people and adults who are or may become at risk. The policy has to

be supported by strong governance, and should reinforce best practice across the whole Council. It aims to ensure all services are delivered so that children and young people at risk are safe from harm and are able to fulfil their potential and with regard to their own rights (as set out in UN Rights of the Child).

2.4 Rights of a Child- the Council is committed to the 1945 Declaration of Human Rights, and the UN Convention on the Rights of a Child. The Social Services and Well-being (Wales) Act (2014) has recently reviewed national guidance on safeguarding practice in Wales to ensure that children are safe and protected, and vulnerable people are able to live their lives fully, and to achieve their own wellbeing outcomes.. The Safeguarding Vulnerable Groups Act (2006) still applies in England and Wales. This Act aims to prevent those deemed unsuitable to work with children and vulnerable adults, from gaining access through work (whether paid or unpaid). The Act was established to try and solve the failures identified by the 2004 Bichard Inquiry.

2.5 Safeguarding as a corporate priority- Swansea Council's latest corporate safeguarding policy is our statement of shared values and corporate expectations. It acts as a record of our policy commitment to vulnerable children and this document gives detail on the arrangements in respect of future safeguarding actions to be taken. We have also placed safeguarding vulnerable people as a foremost corporate priority, with the Corporate Plan 2018-22.

2.6 Governance Since the first review, the Council has further strengthened governance and management arrangements to oversee the implementation of the revised Corporate Safeguarding policy. The Director of Social Services and lead Cabinet Member jointly chair the Council's Corporate Safeguarding group, to drive forward the group's work programme.

3. WAO Conclusions

3.1 Audit Wales found that the Council has addressed most of the recommendations in our previous national and local safeguarding reports but should strengthen some aspects of its corporate safeguarding arrangements: [AuditWales FollowUpReview Swansea Feb2020](#)

3.2 A number of other Welsh Local Authorities have had similar follow up reviews this year.

3.3 The Audit Wales follow up review report (Feb. 2020) has set out a number of recommendations to Swansea Council of further improvements that could be made. There are no real surprises, as most of these are areas of development we are already working on, and the Audit Wales review team were made aware of this via our self assessment, and during interviews.

4. Audit Wales Recommendations

4.1 Full Table of Audit Wales Recommendations

In their report: Audit Wales identified the following proposals for improvement.

Proposals for improvement
P1 The Council should review its Disclosure and Barring Service (DBS) Policy to remove obsolete references and ensure it is up to date.
P2 The Council should strengthen its Recruitment and Selection Policy in the following ways: <ul style="list-style-type: none">- refer to safeguarding as a key commitment in the opening section of the Council's recruitment policy;- specify that job adverts for posts that require a DBS check will contain an explicit statement on safeguarding; and- cross-refer to the Corporate Safeguarding Policy and the DBS Policy.
P3 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.
P4 The Council should consider whether its tender documentation could be strengthened with regard to safeguarding.
P5 The Council should ensure appropriate monitoring of safeguarding contractual provisions across all Directorates.
P6 The Council should consider producing corporate performance measures in respect of DBS check compliance and better performance measures in respect of corporate safeguarding training.
P7 The Council should take steps to ensure that the mandatory completion of Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training is on track for schools staff.
P8 The Council needs to improve its monitoring of safeguarding training compliance.
P9 The Council needs to accelerate the rate of compliance with the completion of its mandatory safeguarding training.

4.2 Work Programme/ Work groups

Broadly speaking, many of the issues highlighted in the WAO report conclusions have already been addressed, or were being worked on, by work groups set up on behalf of the Corporate Safeguarding group.

See Appendix One: Corporate Safeguarding Group Work Programme

See Appendix Two: Action Plan for tasks remaining

4.3 The next section highlights the progress being made on these recommendations.

5. Recent Progress Against Improvement Areas

5.1 **Recommendation P1.** The Council should review its Disclosure and Barring Service (DBS) Policy to remove obsolete references and ensure it is up to date.

Progress:

- The Disclosure and Barring Service (DBS) is carried out by a dedicate team, and used, where applicable, to help Council managers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.
- Review of Council's DBS policy is underway.
- Corporate system to ensure there is registration/ up to date DBS compliance against staff /posts where there is a requirement, is not yet in place across whole Council
- Service Areas/ Managers have responsibility to assuring themselves on safety./ compliance within their workforce
- Internal Audit have been carrying out a review of Council's DBS compliance on behalf of Audit Committee

5.2 **Recommendation P2:** The Council should strengthen its Recruitment and Selection Policy in the following ways:

- refer to safeguarding as a key commitment in the opening section of the Council's recruitment policy;
- specify that job adverts for posts that require a DBS check will contain an explicit statement on safeguarding; and
- cross-refer to the Corporate Safeguarding Policy and the DBS Policy.

Progress:

- Recent changes to the Council's Human Resources service model is encompassing a full review of all Council's HR policies,
- Policy work is underway, though progress is delayed by Covid-19 restrictions.
- A new Volunteer agreement has been designed for use by managers to ensure that, as well as employment controls, all new volunteers are made aware of safeguarding expectations via induction and training.

5.3 **Recommendation P3** - 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.

Progress:

- We have continued to improve our safe recruitment process, by using the Oracle staff record, a new online recruitment system,

supporting manager self-service, with online toolkits and a plans for the upgrading of the current corporate (Oracle) system.

<https://www.swansea.gov.uk/staffnet/managerselfservice>

- There is a corporate system to ensure there is up to date mandatory/review of training available for all staff /posts, though the capability for routine reporting of compliance is not yet in place across whole Council.
- Corporate Safeguarding group is seeking assurances that Council's implementation of Oracle Cloud will meet this requirement.

5.4 Recommendation P4 - the Council should consider whether its tender documentation could be strengthened with regard to safeguarding.

Progress:

- We have already developed a Safeguarding Policy specifically for Contractors of the City and County of Swansea to detail the Council's expectations of partners and providers, and annexed to the contract.
- Safeguarding clauses are placed in all social care contracts and inserted into other contracts where there are seen as relevant, together with a suitability questionnaire to ensure that all expectations are fully understood.

5.5 Recommendation P5 -the Council should ensure appropriate monitoring of safeguarding contractual provisions across all Directorates.

Progress:

- Outstanding work is mainly to ensure compliance with the above procurement practices, and to ensure there is sufficient capacity across whole Council for contract monitoring.
- Audit Committee has included compliance within social care contracts and Disclosure and Barring Scheme (DBS) checks on their work plan, alongside their focus onto consider all corporate, directorate and service risks.
- This work programme supported by internal audit function, who have carried out the review of DBS checking, within the context of governance on corporate safeguarding

5.6 Recommendation P6 - the Council should consider producing corporate performance measures in respect of DBS check compliance and better performance measures in respect of corporate safeguarding training.

Progress:

- Performance measures relating to safeguarding have been included in the Councils quarterly performance monitoring reports, although they are been taken out for 2020/21

- The Corporate Management Team has identified the need to review how these measures are defined and the data collection systems in place to support accurate 'whole council' reporting.

5.7 Recommendation P7 - the Council should take steps to ensure that the mandatory completion of Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training is on track for schools staff.

Progress:

- Swansea Council produces a detailed VAWDASV Training Framework update report to meet statutory requirements, which sets out a detailed delivery plan (Sept. 2019).
- Swansea Council is expected to achieve compliance for all staff in all service areas, including education

5.8 Recommendation P8 - the Council needs to improve its monitoring of safeguarding training compliance.

Progress:

- Service Areas/ Managers currently have responsibility to assuring themselves on safe employment / compliance within their workforce
- There is an updated list of the Corporate Safeguarding Leads within the Council, to support managers in meeting the expectations set out in Council's corporate safeguarding policy
- The Council's investment in Oracle Cloud is expected to deliver improvements about how staff records are managed, and policy compliance reported on.

5.9 Recommendation P9 - the Council needs to accelerate the rate of compliance with the completion of its mandatory safeguarding training.

Progress:

- The mandatory training courses for staff and elected members have recently been reviewed and updated to reflect the new national guidance, launched in Nov. 2019.
- Corporate training on safeguarding children and adults is mandatory for all staff, and elected members are expected to complete the training, which is offered electronically, or , if staff do not have an email account, then by face to face training <https://www.swansea.gov.uk/staffnet/mandatorycourses>.
- Our training offer extends across four levels:
 - Level 1. All Staff- basic awareness (1 ½ hr)
 - Level 2. Safeguarding practice (1 day)
 - Level 3 Responsible persons/ Managers/ Providers (1 day)

Level specific for Name Safeguarding Persons (new course in development)

- A Master Training Record kept shows all elected members, completed the expected safeguarding training

6. Conclusions

6.1 Whilst there are a number of areas in which the Council is expected to improve, there is already a work programme in place, under the leadership of the Corporate Safeguarding group, to achieve this.

6.2 Proposed Actions:

- i To carry on with work programme, and actions as identified by Corporate Safeguarding group / task groups (see Appendix 1 & 2)
- ii To monitor progress against Audit Wales recommendations, and report within the Council's Annual Report on Safeguarding

APPENDIX ONE: CORPORATE SAFEGUARDING GROUP WORK PROGRAMME/ WORK GROUPS (2019/ 2020)

WORK GROUP	AIM OF GROUP	SCOPE OF WORK
<p>1. Safe Employment Lead Officer: Nicola Reid</p>	<p>To ensure safe employment practices are in place to safeguard vulnerable children and adults.</p>	<ol style="list-style-type: none"> 1. Updating safeguarding elements within Council recruitment policy and staff handbook. 2. Ensure DBS checks are undertaken for roles that have identified as required and review of DBS processes/policies – who reviews decision on DBS risk assessments and the need for this. 3. Safeguarding roles and responsibilities are reflected with all Job Descriptions 4. For all contractors to confirm that they comply with Swansea Council Safeguarding Policies and their staff or their sub-contractors staff are aware of their responsibilities and duties and when required provided or able to provide safeguarding awareness raising and training.
<p>2. Safe Workforce Lead Officer: Teresa Mylan Rees</p>	<p>To ensure that all Staff, Elected Members across SC directorates as well as our Foster Carers, Direct payment PA's and commissioned providers are trained/qualified to the appropriate level and therefore aware of their responsibilities and duties to report regarding the safeguarding of Adults and Children. To ensure SC has a register of Safeguarding leads in each area and that each area has a Named Safeguarding person (NSP).</p>	<ol style="list-style-type: none"> 1. Identification of Named Safeguarding person role within each service and development of system within Safe workforce group to keep this updated 2. Named Safeguarding person (NSP) training to be designed and delivered across Adult and Child and Family Services Named Safeguarding Person training (children) and named safeguarding person training (Adults), Safeguarding Adults Non Criminal Investigation Training Level 4 3. Insuring all Council Staff know their safeguarding responsibilities through the Induction Process via corporate induction and managers across directorates and teams. Safeguarding training provides staff with guidance on how to raise concerns through existing policies and procedures: <ul style="list-style-type: none"> o Corporate Induction o Social Services o Housing o Elected Members o Education o Place o Resources

<p>Safe Workforce cont.</p>		<p>Set up a process and system to enable a consistent approach to collate and monitor mandatory safeguarding training and associated training relating to statutory reporting responsibilities e.g. VAWDASV group 1 (face to face or e-learning), Modern slavery awareness.</p> <ol style="list-style-type: none"> 4. Carry out training needs analysis within service to ensure all service area managers and employees receive the appropriate level of safeguarding e-learning or face to face corporate mandatory training ,(level 2 child protection/safeguarding, level 2 safeguarding adults, level 3 child protection/safeguarding, level 3 safeguarding adults) 5. All Council elected members undertake safeguarding training / e-learning 6. Reporting on regional safeguarding developments / safeguarding campaigns – National Safeguarding Week, CSE Day, Facilitation of practice learning events for relevant professional 7. Ensure that all training reflects current legislative and policy objectives at a national, regional and local levels 8. To have a realistic and achievable target for staff completion of mandatory safeguarding training
<p>3. Safe Practice & Safe Partnerships Lead Officer: Damian Rees</p>	<p>Ensure safe practice across Swansea in respect of responding and reporting to safeguarding matters</p>	<p>S.135 Compliance audit to be completed and include adult services as well as all Council Departments</p>
<p>4. Safe Voice Lead Officer: Ffion Larsen</p>	<p>Ensure individuals have a “safe voice” on safeguarding matters by providing stronger voice, real control over the support they receive and remove any barriers to achieving their wellbeing outcomes. Also ensure that individuals feel that they are equal partners in the process and that intervention is meaningful. There will be focus on early intervention to prevent needs escalating</p>	<ol style="list-style-type: none"> 1. Ensure that Covid 19 changes in practices and policies focuses on safeguarding and the voice of the individual. 2. Ensure that every conversation matters by working to ensure meaningful interventions at every level 3. Provide accessible information to support participation and understanding. 4. Collaborative Communication: embed a person centred approach Adult SW practice, including safeguarding, by placing the individual central to the safeguarding. Ensuring needs, goals and outcomes are captured. 5. Emphasis of making safeguarding personal in adult services to ensure the process is meaningful for individuals with emphasis on prevention and early intervention.

<p>Safe Voice cont.</p>		<ol style="list-style-type: none"> 6. Develop tools for practitioners to support a person centred approach to collaborative communication and safeguarding. 7. Focus on qualitative reporting on outcomes and well as qualitative measures. Develop an auditing and quality assurance framework 8. Ensure that individuals are aware of their rights and their human rights 9. Educate partners on the need to be person centred
<p>5. Safe Performance Lead Officer: Simon Jones</p>	<p>To develop and implement a performance framework to cover full range of improvement activities in relation to Corporate Safeguarding</p>	<ol style="list-style-type: none"> 1. Framework of performance / improvement activities linked to Corporate safeguarding (Golden thread) 2. Complete the Annual review of Performance – Corporate Plan/ Annual Report 3. Update and publish latest version of Corporate Safeguarding Policy 4. Support data development in the reporting of suite of key performance measures to Senior Managers/ Elected Members 5. Regulatory compliance for corporate safeguarding arrangements, backed by self- assessment / audit cycle

**APPENDIX TWO. ACTION PLAN SWANSEA COUNCIL: CORPORATE SAFEGUARDING ARRANGEMENTS- CHILDREN
2019/20**

REPORT REF	RECOMMENDATION	STATUS	OUTSTANDING ACTIONS/ COMMENTS	LEAD	BY WHEN?
P1	The Council should review its Disclosure and Barring Service (DBS) Policy to remove obsolete references and ensure it is up to date.	In Progress	Actions to be undertaken by Safe Employment group on behalf of the Corporate Safeguarding group	Nicola Reid	By end March 2021
P2	The Council should strengthen its Recruitment and Selection Policy in the following ways: <ul style="list-style-type: none"> - refer to safeguarding as a key commitment in the opening section of the Council's recruitment policy; - specify that job adverts for posts that require a DBS check will contain an explicit statement on safeguarding; and - cross-refer to the Corporate Safeguarding Policy and the DBS Policy. 	In Progress	Actions to be undertaken by Safe Employment group on behalf of the Corporate Safeguarding group	Nicola Reid	By end March 2021
P3	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.	In Progress	Actions to be undertaken by Safe Workforce group on behalf of the Corporate Safeguarding group, linking with to Safe Employment/ Transformation (Oracle Cloud)	Sarah Lackenby (Transformation)	TBC

REPORT REF	RECOMMENDATION	STATUS	OUTSTANDING ACTIONS/ COMMENTS	LEAD	BY WHEN?
P4	The Council should consider whether its tender documentation could be strengthened with regard to safeguarding.		Actions to be undertaken by Safe Employment group on behalf of the Corporate Safeguarding group	Lee Morgan	
P5	The Council should ensure appropriate monitoring of safeguarding contractual provisions across all Directorates.	In Progress	Actions to be undertaken by Safe Employment group on behalf of the Corporate Safeguarding group	Heads of Service	
P6	The Council should consider producing corporate performance measures in respect of DBS check compliance and better performance measures in respect of corporate safeguarding training.	In Progress	Actions to be undertaken by Safe Performance group on behalf of the Corporate Safeguarding group	Simon Jones	
P7	The Council should take steps to ensure that the mandatory completion of Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training is on track for schools staff.	In Progress	Actions to be undertaken by Safe Practice/ Partnership group on behalf of the Corporate Safeguarding group	Damian Rees	
P8	The Council needs to improve its monitoring of safeguarding training compliance	In Progress	Actions to be undertaken by Safe Performance group on behalf of the Corporate Safeguarding group	Simon Jones	
P9	The Council needs to accelerate the rate of compliance with the completion of its mandatory safeguarding training.		Actions to be undertaken by Safe Workforce group on behalf of the Corporate Safeguarding group	Teresa Mylan-Rees	

