



**To/
Councillor Louise Gibbard
Cabinet Member for Care Services
BY EMAIL**

cc: Cabinet Members & Chair of
Governance & Audit Committee

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Scrutiny

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SPC/2022-23/5

04 January 2023

Summary: This is a letter from the Scrutiny Programme Committee to the Cabinet Member following the meeting of the Committee on 15 November 2022. It is about the Annual Report on Corporate Safeguarding. A formal written response is required by 25 January.

Dear Councillor Gibbard,

Scrutiny Programme Committee – 15 November

We are writing to you following our scrutiny session to monitor and challenge Council action in relation to Corporate Safeguarding, which took place during National Safeguarding Week.

We thank you and officers for attending the Committee to present the Annual Report which reflected on activities during 2021/22. The Annual Report is a standing item within the Committee work plan given safeguarding is one of the Council's top priorities, so we can comment on progress, achievements, and implementation of policy. Previous discussion was in November 2021. The issues raised during discussion then were around: compliance by those carrying out work for the Council with the Council's Safeguarding Policies (paid or voluntary), and training / guidance; DBS checking for such persons; and progress against the work planned against each of the seven key areas of corporate safeguarding activity: Safe Governance, Safe Employment, Safe Workforce, Safe Practice, Safe Partnerships, Safe Voice, all contributing to Delivering Safe Performance.

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This letter reflects on what we learnt from the information presented, questions, and discussion. It shares the views of the Committee and highlights any outstanding issues / actions for your response - key issues summarised below.

You highlighted:

- the role of the Corporate Safeguarding Group which leads on the development of corporate safeguarding policy and monitoring of policy implementation.
- developments and achievements against the seven key areas of activity.
- revision to Corporate Safeguarding Policy with a greater focus on prevention and introduction of a duty to report placed on all Council staff, which has been incorporated into a revised mandatory training programme. The policy aims to make sure our work covers the full extent of potential, contextual safeguarding risks and concerns posed to vulnerable people, such as child sexual exploitation, modern slavery, radicalisation, etc.
- a positive internal audit report on corporate safeguarding and feedback from Estyn review on Council's Education Services which endorses the Council's approach to safeguarding.
- self-assessment activity (previously referred to as Section 135 Audit) to provide assurances that arrangements are robust in all the Council's main service areas, and to identify any additional improvements needed.
- update on issues arising from previous year's scrutiny session, including mandatory training compliance, the disclosure and barring service, contracting and procurement, and safeguarding leadership.
- the work programme for the year ahead, and management action plan following the recent Internal Audit report.

Working with Contractors and Suppliers

Having raised this in previous Scrutiny sessions, the Committee recognised that a lot of work has been done on this. It is clear the Council expects that all staff employed by contractors (and sub-contractors) and suppliers, carrying out work on the Council's behalf, are fully aware of their broader responsibilities and duties and must confirm that they comply with Swansea Council corporate safeguarding policy, and when required checks are carried out and staff given safeguarding awareness training. We noted that we have a suitability questionnaire to ensure that all expectations, in relation to safeguarding, are fully understood.

We appreciate there are various levels of conditions depending on the nature of services contracted, but asked about monitoring arrangements in place to keep on top of this given the scale of wide-ranging activity across all departments. We were told that monitoring is a challenge and contractual expectations would be proportionate based on the type of service and extent of public contact. At a minimum contractors and suppliers will need to state

they comply with the Council's policy, but a more intensive level of monitoring would be in place, for example, for organisations providing personal care services, and more generally safeguarding compliance would be a consideration at contract review, etc. We welcomed using our Internal Audit team to carry out checks on compliance with process and procedures across the Council, and how well it is embedded, in addition to the Corporate Safeguarding Group's self-assessment activity.

Mandatory Training Compliance

We asked whether there was now effective oversight of training compliance across the Council. We noted that this included safeguarding awareness training, and violence against women, sexual violence, and domestic abuse training. We heard that work is still underway in the development of management information to evidence compliance in achieving mandatory training standards across all service areas. There are issues in how we report compliance across the whole Council as there have been other systems in use, for example in Social Services and Education to support regional approaches and national demands. We noted that delayed implementation of the new Cloud based corporate ICT system (Oracle Fusion) has held up support for real-time reporting of staff training records and employee data checks – the system has a revised go-live date of April 2023. However, based on manual checks which the Corporate Safeguarding Group has reviewed, indicates a compliance level of around 80%, which is considered as good. Managers were currently responsible for compliance, in terms of how many of their staff are completing mandatory training, within their own teams.

We can see that Internal Audit has also recommended (arising from their audit of Corporate Safeguarding) that work should continue to develop the recording of all employee Safeguarding training on the Council's new Oracle Fusion system. You reported that this is a priority action for the Corporate Safeguarding Group.

Disclosure and Barring Service (DBS)

The Committee asked about progress in ensuring that all work roles and responsibilities are risk assessed and, where necessary, DBS compliant. We also queried whether there were issues in relation to DBS checks, e.g., processing timescales.

You reported that the Service Centre Helpdesk is now responsible for all ID applications and verifications, previously carried out in the Contact Centre. Alongside this, there is daily monitoring of compliance to ensure that verifications are tracked to completion. Lists of renewals and overdue DBS checks are sent to Heads of Service, every month reports and copied to Human Resources to allow them to raise any queries/issues. We heard that the DBS is currently working well, including communication with the

processing authority, which is Powys Council, and that the Corporate Safeguarding Group is satisfied with processing arrangements.

We noted that the DBS Policy has recently been reviewed and updated, and is awaiting final agreement. We asked about DBS requirement criteria, and the challenge it provides for organisations, and noted an understandably cautious approach within the Council around who should have a DBS check. The Committee would appreciate information about the rules / guidance and expectations around what staff across the Council would require a DBS check and what level of check, to better understand things.

Advocacy

You reported that there is work on promoting collaborative practice at the front door, within frontline teams and across all Council services. This work contributes to 'Safe Voice' aims of placing the adult / child firmly at the centre of their concern, and engaged with decisions in their own best interests, whether directly or through advocacy.

We noted that both Child & Family and Adult Services are improving the Council's advocacy offer made to vulnerable children, adults and their families, who can now access Independent Professional Advocacy to help ensure that they are fully informed and engaged in decisions about their care and support and that plans are in their best interests and with regard to safety. For the year ahead the report stated intention to continue development of advocacy offer and independent support to promote citizen rights and best interest decision within safeguarding and deprivation of liberty safeguards.

The Committee noted that advocacy arrangements within Child & Family Services were well established nationally and embedded locally / regionally and under regular review. It was more challenging to develop and expand an all-encompassing Adult Advocacy Service in a similar fashion to Child & Family Services, given the numbers of people many of which would have capacity to advocate for themselves or through carers, but was clearly needed for people in certain circumstances, e.g., deprivation of liberty, and would be commissioned for those individuals. You talked about other approaches and potential opportunities through co-production for people's voices to be heard, aside from formal independent advocacy.

Work for the Year Ahead

We look forward to next year's Annual Report when we can follow up on these issues. We can also follow up on work you have identified within this year's report for the year ahead:

Safe Employment

- To complete work on updating and finalising policies relating to recruitment and selection, DBS checks and volunteers, to reflect the latest corporate safeguarding policy
- To ensure corporate safeguarding policy, responsibilities and expectations are reflected in all work commissioned or contracted on the Council's behalf

Safe Workforce

- Development of management information: employee / elected member compliance in completion of mandatory training
- Ensure there are named safeguarding officers in each service area, and representation at the Corporate Safeguarding Group meetings
- Continue roll out of revised mandatory training across Council through hybrid programme of e-learning, virtual and face to face options to meet diverse needs of service areas and employees
- To work with Fusion team to ensure safe and accurate transfer of current staff records and to look at solutions to tackle reporting issues

Safe Practice

- To implement quality assurance frameworks within child and family and adult services
- To undertake next self-assessment (Section 135 audit) cycle, involving leads from all Council Departments

Safe Partnerships

- To continue to embed corporate safeguarding policy procedures into how we work with suppliers in carrying out checks, specifying contracts, building awareness in the wider workforce and contract monitoring

Safe Voice

- Continued development of advocacy offer and independent support to promote citizen rights and best interest decision within safeguarding and deprivation of liberty safeguards
- Working within families, communities, and schools to promote safeguarding awareness

Safe Performance:

- To review performance framework for corporate safeguarding and agree set of measures for 2023/24

We noted that a Corporate Safeguarding Working Group has been set up to ensure that the work programme keeps moving forward and operates within timescales – with named safeguarding lead working closely together to drive improvements in all seven of the key areas - and is reporting progress to the Corporate Safeguarding Group which is chaired by the you, as lead Cabinet Member, and the Director of Social Services.

Your Response

Overall, the Committee thanked you and lead officers for a very good report and were pleased to see the progress made. We commend the continuing efforts of the Corporate Safeguarding Group across the Council to make safeguarding everyone's business – not just a matter for Social Services and Education.

We hope that you find the contents of this letter helpful and would welcome comments on any of the issues raised within. Specifically, we would appreciate information about the criteria for DBS checks as stated. We also asked for confirmation whether the recent Internal Audit report on Corporate Safeguarding has been reported (or is due to be reported) to the Governance & Audit Committee, otherwise would appreciate sight of the report. Please provide copy with your response, as appropriate.

Please provide your response to these, and any other comments about our letter by 25 January. We will then publish both letters in the agenda of the next available Committee meeting.

We will make sure that consideration of the next Annual Report is scheduled into the Scrutiny Programme Committee's work plan for 2023/24.

Yours sincerely,



COUNCILLOR PETER BLACK

Chair, Scrutiny Programme Committee

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