



Report of the Chief Finance Officer

Audit Committee – 9 March 2021

Service Centre – Disclosure & Barring Service (DBS) Follow Up Report

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| Purpose: | To provide an update for the Service Centre, Disclosure & Barring Service (DBS). |
| Policy Framework: | |
| Consultation: | Legal, Finance and Access to Services |
| Recommendation(s): | It was recommended that Employees & Managers: - 1) be further reminded of their responsibilities and role in the DBS process. This should be reinforced through the Directors and Heads of Service to ensure consistency and robustness of process; 2) Continue to report to CMT on a quarterly basis as a further update on the position across the Authority. |
| Report Author: | Sian Williams (Head of Service Centre) & Emma Johnson (Helpdesk, DBS & SCW Manager) |
| Finance Officer: | Ben Smith (Chief Finance Officer S151) |
| Legal Officer: | Debbie Smith (Deputy Chief Legal Officer) |
| Access to Services Officer: | Rhian Millar (Equalities Policy Development Officer) |

Internal Audit on Disclosure & Barring Service Function – Update March 2021

1. Introduction

As a result of an internal audit on the DBS function carried out in Quarter 1 2020, an assurance level of moderate was given in the final report issued In May 2020.

- 1.1 An action plan was developed to address the issues identified and appropriate implementation steps put in place.

This action plan identified 12 recommendations, 10 of which have been fully implemented, 1 is partially implemented, and 1 not implemented using the criteria of “1 week” but an alternative solution has been found. (HR 2.2.7 below)

The action plan has not been re-tested or updated by internal Audit and the comments are entered by the department.

1.2 The following HR & MR actions (High Risk & Medium Risk) were identified

High Risk

2.2.6 “More rigorous follow up process to ensure employees’ DBS renewals are expedited prior to expiry & full review of school spreadsheets to ensure all DBS are current”.

2.2.7 “Robust process to ensure employees have a risk assessment conducted within 1 week of the expiry, where the renewal has not taken place before the expiry date”

Medium Risk

2.2.4 “All ‘on hold’ are contained in the ‘adverse’ spreadsheets

2.4.1 “All DBS information on Oracle should be updated in a timely manner”

2.6.3 “Reconciliation exercise to be undertaken to identify all incomplete DBS applications”

1.3 A progress report was presented to Audit Scrutiny Committee on 8th September 2020.

This was reviewed and 2 actions were recommended:

- Update CMT on the DBS position
- All Service Departments be reminded of their responsibilities and role in the DBS process, which should be reinforced through the Directors and Heads of Service to ensure consistency and robustness of process.

1.4 These actions were completed and included in the Audit Committee papers for 20th October 2020. The Committee also requested that a further progress report be submitted for the 9th March 2021 Audit Committee meeting. Previous summary reports have outlined the background and reasons that led up to the moderate rated DBS audit report so these are not covered in this report. This report seeks to present the current DBS position and the progress made to date.

2. Current position:

- 2.1 To give some background and context, the DBS function previously had a dedicated team of 5 and as part of the implementation of the Ebulk system, the team was reduced to 2 as part of Sustainable Swansea and merged into the Service Centre to form part of the Helpdesk.
- 2.2 Over the last four years, the Service Centre Helpdesk has matured its business model significantly. Currently there are 9 employees within the Helpdesk – 1 Manager, 1 Team Leader, 3 Full Time Officers and 4 Part Time Officers.
- 2.3 The Service Centre Helpdesk is the first point of contact for the Service Centre covering the following areas:
 - Accounts Payable
 - Accounts Receivable
 - HR&OD
 - Employee Self Service
 - Manager Self Service
 - Payroll
 - Purchasing
 - Workforce

The team is also wholly responsible for the following functions:

- DBS
- Flexi/Planned Leave
- Social Care Wales (administration/compliance)

On average the team receives, per month:

- 2800 email queries, 36% of which are DBS
- 1400 telephone queries, 12% of which are DBS

3. Progress to date:

3.1 Update on Actions

2.2.6(HR) In addition to the current process ie sending monthly reports to all departments, the Service Centre Helpdesk now send:-

- Monthly reports sent to HR&OD Business Partners to raise with areas directly.
- Monthly reports sent to Schools Challenge Advisors to liaise directly with respective school(s).

2.2.7(HR) All DBS reports are produced on a monthly basis as per system functionality within Oracle. Unfortunately there is no scope to run weekly reports, however, as an alternative to mitigate this risk, the Service Centre Helpdesk Manager has implemented a Risk Assessment Register, emails are issued to departments/schools

and a deadline given for completion; any non-compliance results in reminders being issued and then escalation to HR&OD to liaise with the relevant business area.

A daily Certificate report is run from the Ebulk system and details entered onto Oracle.

2.2.4(MR) This has been implemented, all new DBS returns from the Ebulk system are checked daily and positive cases added to spreadsheet and letter issued.

2.4.1(MR) This recommendation had to be placed on hold due to the pandemic and the Oracle Fusion project being paused. This will now be picked back up as part of the restart of the project, implementation is scheduled for October 2021.

2.6.3(MR) This recommendation has been partially implemented, reports now received are cross referenced to monthly renewal lists. There is additional work required in Oracle to ensure DBS are coded correctly and this will form part of the project plan with a scheduled go live for October 2021.

4. Additional Progress/Changes

4.1 The list below provides visibility of additional changes and measures implemented in respect of the DBS process.

- Following the DBS Audit, revised procedures were implemented, such as the Risk Assessment Register to strengthen the compliance process which has seen an improvement in returns of 57%.
- As a result of the pandemic, in early 2020, the Helpdesk Manager took over all ID verifications that were previously carried out in the contact centre; this has proved to work so well with daily monitoring implemented that the process will remain within the Helpdesk, and to date over 1000 verifications have been undertaken.
- The DBS Policy has been reviewed and updated and is awaiting agreement; alongside this, work is underway reviewing the procedure guide and letters for Managers/Schools.
- Development of a formal escalation process currently underway, to further reinforce roles/responsibilities and necessary compliance.
- Communications will be issued to all relevant parties, including a document reinforcing the roles and responsibilities of employees, managers and schools.
- Staffnet area to be updated to reflect changes and provide additional information and FAQ's.
- Closer collaboration on DBS procedure across the authority (HR&OD Principle Business Partner for Education & Social Services)
- Update CMT on the DBS position – this was undertaken in October 2020 and February 2021 by the Head of the Service Centre and will be continued on a quarterly basis.

- Head of Service Centre and/or Service Centre Helpdesk manager to attend Safeguarding meetings in Social Services

5. Continued challenges

- The global pandemic has been a big barrier to the progression of some of the recommendations, with priorities shifted and new ways of working needing to be introduced at very short notice; it should also be noted that Schools were closed for a period of time. However, with the plan from WG to start to relax some of the restrictions and the opening of schools, hopefully this will reduce somewhat as we progress throughout the year.
- The Oracle Fusion project go-live is scheduled for Autumn 2021 and key members of staff from the Service Centre are assigned to the delivery of this project. Team members of the Helpdesk are fully trained in the DBS process but will need input from their Manager on occasions.
- Staffing remains a factor, we currently have three members of staff absent (medium/long term) from work at the time of writing this report.

6. Equality and Engagement Implications

The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid due regard to the above.

There are no equality or engagement implications in this report.

7. Financial Implications

There are no financial implications other than those set out in the body of the report.

8. Legal Implications

There are no legal implications other than those set out in the body of the report.

Background Papers: Recommendations Tracker Updated as at March 2021.

Appendices: None.