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*Date:* 6<sup>th</sup> January 2023

Dear Councillor Black

**Scrutiny Programme Committee – 14 November 2022, Annual Report - Corporate Safeguarding 2021/22 - Response to Feedback**

Thank you for your letter dated 4th January 2022, which was your committee's response to the annual report that myself and Officers presented on 14th November 2022, during, as the Chair noted, National Safeguarding Week.

Presenting the annual report to the Committee, was a valuable opportunity to pause and reflect on how collectively we are working in the interests of the most vulnerable in our communities. How we have come through the challenges of the pandemic, and we are now faced with deep social impacts of the emerging cost of living crisis.

I am pleased to note that the Committee acknowledges the quality of the report, and the work programme taking place to achieve corporate safeguarding. As a Council, we can be proud not only of our ambition, and efforts in taking forward a strategic, whole system approach to safeguarding our most vulnerable children and adults. We can also be proud of our work, reflected in the annual report's many positive examples of how we are continually striving to improve our support to citizens, families, and communities.

The report also reminds us that as public officials and officers we have an individual duty to report concerns, where we are alerted to, or are ourselves concerned about the welfare of a child or vulnerable adult.

We are facing unprecedented times, and many more families are experiencing pressures just to survive, yet the Council remains focused on improving prevention and our wellbeing offer through an excellent range of services such as early help and local area coordination.

As Cabinet Member for care services, I believe it is vital that people are listened to, that public services focus on what matters most, and by giving an informed, compassionate, and fair response.

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In December, Swansea was declared as Wales's first Human Rights City, reflecting our ambition, and vision of a vibrant, diverse, fair, and safe communities built on the foundations of universal human rights. I believe that achieving our ambition will require the positive culture and leadership so well demonstrated within the Council's approach to corporate safeguarding.

Firstly, I was pleased that the report and the Committee's questions, generated such a supportive, yet challenging discussion. Secondly, I welcome your comments on the report's highlights, and work programme for the year ahead:

- how we work with contractors and suppliers so that they fully embrace our values and awareness of safeguarding issues.
- how we maintain oversight of compliance in staff undertaking mandatory training
- how we ensure that all necessary work roles and responsibilities are subject to the right level of DBS checks
- as I have mentioned above that through our 'Safe Voice' approach, we are working with the vulnerable person in mind, at the centre of everything we do and fully engaged with decisions that impact their lives and striving to further develop our advocacy offer.

As a Council, we clearly still have work as lots of areas of our business impact on the lives of many, and in particular those most vulnerable.

In answer to the additional matters raised, I would make the following comments:

### 1. Disclosure and Barring Service (DBS)

As you noted, Council Officers have prepared the final draft of a revised Disclosure and Barring Service (DBS) policy, and wider consultation is underway. This updated policy will contain full detail on how to apply criteria for carrying out DBS checks, and how to risk assess whether a position needs a DBS check.

Here is a link to the national tool the Council currently uses to apply DBS criteria:

[Find out which DBS check is right for your employee - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/find-out-which-dbs-check-is-right-for-your-employee)

### 2. Internal Audit report on Corporate Safeguarding

I can confirm that the Internal Audit report on Corporate Safeguarding audit was completed in September 2022, and this gave a High Assurance rating. A brief summary of the results, though not the whole report, were included in the Q2 Monitoring Report presented to the Governance & Audit Committee in November 2022. I have arranged for the full report to be made available, and this will be forwarded alongside this letter.

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I trust my responses address the issues raised, and I look forward to presenting the next Annual Report 2022/23, as part of the Committee's work plan in 2023/24.

Yours Sincerely,



Cllr Louise Gibbard

**Cynghorydd / Councillor Louise Gibbard** Dyfnant a Chilâ  
Cyd-aelod y Cabinet dros Gwasanaethau Gofal  
Cabinet Member Care Services



## Final Internal Audit Report

### Social Services

## Corporate Safeguarding 2022/23

### 1. Introduction

- 1.1 An audit has been carried out of the Council's Corporate Safeguarding arrangements.
- 1.2 Safeguarding is one of the Council's Corporate Priorities, and the safeguarding of both vulnerable children and adults is seen as one of the most important functions that the council is required to deliver.
- 1.3 The scope of the review covered the following areas:
  - Corporate Policy Development
  - Corporate Safeguarding Group
  - Staff Training
  - West Glamorgan Safeguarding Board
  - S135 Self-Assessment Questionnaires
  - Performance Monitoring
- 1.4 The objectives of the audit were to ensure that the Council's Safeguarding arrangements are robust and are subject to regular monitoring and review.
- 1.5 The findings arising from this review and the audit opinion are stated in the report below. The recommendations made to address the findings are included within the attached Management Action Plan.

### 2 Work Done / Findings

#### 2.1 Corporate Policy

- 2.1.1 Swansea Council's Corporate Safeguarding Policy has been complied to protect the most vulnerable people in the community. It is a statement of corporate expectations, a record of policy commitments and gives detail on the arrangements in respect of safeguarding actions to be taken.
- 2.1.2 The Policy sets out how the City and County of Swansea will meet its statutory obligations towards the safeguarding of children and adults at risk.
- 2.1.3 The Policy was reviewed, and it was found that it had last been updated in June 2022. We were informed that it is revised when required by the Social Services Strategy & Performance Improvement Officer and further analysis highlighted that the roles and responsibilities of responsible officers were clearly defined.

## **2.2 Corporate Safeguarding Group**

- 2.2.1 It was confirmed that the Corporate Safeguarding Group meets on a quarterly basis. This group is co-chaired by the Cabinet Member for Care, Health and Ageing Well, and by the Director of Social Services.
- 2.2.2 It is a management and leadership group which oversees the implementation of the Corporate Safeguarding Policy. The group provides 'safe governance' as set out in the Council's Policy, and through an agreed work programme aims to ensure that all Council services are operating effectively in accordance with the Corporate Policy.
- 2.2.3 Task Groups have been set up to deliver the seven key themes set out in the Corporate Policy and these are headed by Safeguarding Leads from within Social Services who report back to the Group.
- 2.2.4 The remaining membership of the Corporate Safeguarding Group is made-up of designated lead managers from other services across the Council.
- 2.2.5 An annual report is prepared by the Group and it was established that the report for 2020/21 was presented to the Scrutiny Programme Committee on 19 October 2021, and to the Audit & Governance Committee on 9 November 2021.

## **2.3 Training**

- 2.3.1 The Council's Safeguarding training includes face-to-face, e-learning and class based training to meet the needs of the whole workforce, with officers being required to carry out mandatory training courses every three years.
- 2.3.2 The learning available to employees includes:
  - a) e-Learning
    - "Safeguarding Adults": this course looks at different elements that contribute to keeping vulnerable adults safe, and how to recognise and report concerns.
    - "Safeguarding and Protection of Children": this course helps staff learn how to recognise when a child may be suffering from abuse or neglect and what can be done to help.
  - b) Training Levels 1 to 3 in accordance with national guidance for officers with role specific requirements within Social Services.
  - c) Named Safeguarding Lead training. This programme enables service area Safeguarding Leads to gain knowledge for their own needs, and which can also be passed on to other officers in their service.
  - d) Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV). The training provided to employees is one of the key mechanisms for delivering the VAWDASV (Wales) Act 2015. As part of this act, the Council has a duty to train all of its workforce and elected members. The Council strives to meet this target with a combination e-learning and face-to-face sessions.

e) Elected Members. The Council aims to ensure all elected members complete the eLearning awareness training on Safeguarding Children, Safeguarding Adults, and VAWDASV. There is an expectation is that each Councillor completes this training within each electoral cycle.

2.3.3 Service Managers are responsible for ensuring their staff complete the Council's mandatory training, and for keeping a record of its completion. Reminders regarding the completion of staff training should be issued periodically by the Safeguarding lead in each service.

2.3.4 Absolute numbers of staff who have completed training are no longer recorded centrally due to the turnover of employees across the Council, and due to variances in how staff training was being recorded in different services and schools. This was leading to inconsistencies in the reporting of completion figures for the Council as a whole.

2.3.5 It is planned that the development of the new Oracle Fusion system will include the ability to record the Safeguarding training undertaken by each employee. This will enable accurate records and statistics on the completion of Safeguarding training to be available for all services of the Council.

## **2.4 West Glamorgan Safeguarding Board**

2.4.1 The West Glamorgan Safeguarding Board (WGSB) promotes and supports multi-agency safeguarding for Children and Adults across Neath Port Talbot and Swansea. It is a statutory mechanism for agreeing how organisations will co-operate to safeguard the welfare of children and adults living in the region.

2.4.2 The Board is responsible for agreeing on how different services and professional groups should co-operate to safeguard children and adults. Its members include Swansea Council, Neath Port Talbot Council, Swansea Bay University Health Board, South Wales Police and a number of other public bodies and charities.

2.4.3 The Council's Corporate Safeguarding Group provides updates to the West Glamorgan Regional Safeguarding Board and the following Council officers are members of the Board:

- Director of Social Services
- Head of Adult Services
- Head of Child & Family Services
- Principal Officer for Safeguarding and Performance Quality
- Head of achievement and Partnership

2.4.4 The Board publishes an Annual Plan with its priorities for the year and all partners have shared accountability for its implementation.

2.4.5 There are several sub-groups and membership, with structures regularly being reviewed and updated. Work plans for the sub-groups are aligned with the Annual Plan and include strategic priorities, the actions to achieve these, and success measures to be used to monitor effectiveness. The work plans are regularly reviewed and amended through the year and reports outlining progress are presented to the Board on a quarterly basis.

2.4.6 Outcomes for the year are subsequently included in an annual report, and the most recent West Glamorgan Safeguarding Board annual report published was for 2020-21.

## **2.5 S135 Audit**

- 2.5.1 Swansea Council's Corporate Safeguarding Group has carried out annual safeguarding self-assessment audits in 2020/21 and 2021/22 in order to satisfy the requirements of Section 135 of the Social Services & Wellbeing (Wales) Act 2014.
- 2.5.2 It was confirmed with officers that the 2022/23 exercise was underway at the time this internal audit was being carried out.
- 2.5.3 A questionnaire is sent to each of the Council's service areas and satisfactory responses provide the Group with assurance that the Council's safeguarding procedures are sufficiently robust.
- 2.5.4 It was noted that while responses had been received from most service areas across the Council, returned questionnaires had not been received from Highways & Transportation, Legal, Communications & Marketing and Digital & Customer Services.
- 2.5.5 The findings from this exercise are presented to the Corporate Safeguarding Group and are included in its annual report. Any findings are also reported to the West Glamorgan Regional Safeguarding Board on an exception basis.

## **2.6 Monitoring of Performance**

- 2.6.1 Headline performance reports in relation to adults and children are presented at Social Services P&FM meetings, which are chaired by the Director of Social Services.
- 2.6.2 Safeguarding performance is also one of the key performance indicators (KPI's) which are reported to the Corporate Management Team on a quarterly basis.
- 2.6.3 There are regular updates to both the Adults and the Child & Family Scrutiny Performance Panels, and the Corporate Safeguarding Annual Report is reported to the Scrutiny Programme Committee and the Governance & Audit Committee annually (see 2.2.5).
- 2.6.4 Safeguarding is also included in the Director of Social Services' Annual Report which is presented to the Council.

### 3. Conclusion

- 3.1 The Internal Audit Section operates a system of Assurance Levels which gives a formal opinion of the achievement of the service's/system's control objectives. The Assurance Levels vary over four categories: 'High', 'Substantial', 'Moderate' and 'Limited'.
- 3.2 Recommendations arising from this review are detailed in the attached Management Action Plan. Each recommendation has been prioritised according to perceived risk – High, Medium, Low and Good Practice. The overall Assurance Level is based on the recommendations made in the report.
- 3.3 The description of each type of recommendation, and the basis for each of the Assurance Levels is noted in Appendix 1.
- 3.4 Based on the audit testing undertaken, it was found within the scope of our review that almost all of the procedures were operating satisfactorily.
- 3.5 As a result, an Assurance Level of “**High**” has been given. This indicates that there is a sound system of internal control designed to achieve the system objectives and the controls are being consistently applied.
- 3.6 This audit was conducted in conformance with the Public Sector Internal Audit Standards.



## Classification of Audit Recommendations

Recommendation	Description
High Risk	Action by the client that we consider <b>essential</b> to ensure that the service / system is not exposed to <b>major risks</b> .
Medium Risk	Action by the client that we consider <b>necessary</b> to ensure that the service / system is not exposed to <b>significant risks</b> .
Low Risk	Action by the client that we consider <b>advisable</b> to ensure that the service / system is not exposed to <b>minor risks</b> .
Good Practice	Action by the client that we consider <b>no risks</b> exist but would result in better quality, value for money etc.

## Audit Assurance Levels

Assurance Level	Basis	Description
High Assurance	Recommendations for ineffective controls affecting the material areas of the service are not High or Medium Risk. Any recommendations are mainly Good Practice with few Low Risk recommendations.	There is a sound system of internal control designed to achieve the system objectives and the controls are being consistently applied.
Substantial Assurance	Recommendations for ineffective controls affecting the material areas of the service are not High Risk. Occasional Medium Risk recommendations allowed provided all others are Low Risk or Good Practice.	There is a sound system of internal control but there is some scope for improvement as the ineffective controls may put the system objectives at risk.
Moderate Assurance	Recommendations for ineffective controls affecting the material areas of the service are at least Medium Risk.	The ineffective controls represent a significant risk to the achievement of system objectives.
Limited Assurance	Recommendations for ineffective controls affecting the material areas of the service are High Risk.	The ineffective controls represent unacceptable risk to the achievement of the system objectives.

**CITY & COUNTY OF SWANSEA  
MANAGEMENT ACTION PLAN  
CORPORATE SAFEGUARDING 2022/23**

REPORT REF	RECOMMENDATION	CLASS	AGREED ACTION/ COMMENTS	RESPONSIBILITY FOR IMPLEMENTATION	IMPLEMENTATION DATE
<b>Training</b>					
2.3.5	Work should continue to develop the recording of all employee Safeguarding training on the Council's new Oracle Fusion system.	LR	This is a priority action in the Corporate Safeguarding Group and work is currently underway to ensure that safeguarding training is being accurately recorded in all areas.	Corporate Safeguarding Group	Spring 23
<b>Self-Assessment Questionnaires</b>					
2.5.4	All services should be required to return their self-assessment questionnaires	LR	This will be reviewed at the Corporate Safeguarding Group where membership and representation will be reviewed.	Corporate Safeguarding Group	Spring 23