



Final Internal Audit Report
Human Resources and Service Centre
Disclosure and Barring Service (DBS) 2022/23

1. Introduction

- 1.1 A review has recently been undertaken of Disclosure and Barring Service (DBS) applications, administered by the Service Centre Helpdesk within Human Resources and Service Centre.
- 1.2 The scope of the review covered the following:
- Internal Procedures
 - Processing of DBS Applications
 - Review of Posts
 - Reports and Monitoring
 - DBS Checks – New Starters
 - DBS Checks - Existing Employees
 - DBS Renewals
 - Payments to Powys County Council
 - Re-charging of Departments
 - System Access / Confidentiality
 - GDPR and Data Retention
- 1.3 The objectives of the audit were to ensure that material business risks have been identified and that the controls in place are adequate for the purpose of minimising business risk and are operating in practice.
- 1.4 The last audit was undertaken in 2019/20 where there were 12 recommendations and an Assurance Level of “Moderate” was awarded. Two follow up reviews were then carried out, one in March 2020 and one in November 2020, where audit identified that there were still a number of recommendations that had not been implemented. It was acknowledged that the impact of the coronavirus restrictions had hampered progress in completing some of the outstanding recommendations, and it was also recognised that improvements have been made with new processes being introduced to try to address the remaining actions. As a result, the decision was made to carry out a full review of the service in the next financial year.
- 1.5 Work carried out and detailed findings are recorded below. The recommendations arising are included in the attached Management Action Plan.

2. Work Done / Findings

2.1 Internal Procedures

- 2.1.1 We were informed by the Service Centre Helpdesk & DBS/SCW Manager that the DBS policy had recently been reviewed and updated. The updated policy is currently with HR and the Trade Unions for approval. This is for information only.
- 2.1.2 Guidance documents on DBS processing & administration were available for both Verification Officers and System Administrators and it was confirmed that all relevant staff have been made aware of where this information is held.
- 2.1.3 General information on the DBS checking process and requirements is available on the staff Intranet, for both managers and staff.

2.2 Processing of DBS Applications

- 2.2.1 Details of the DBS administration process were provided and were found to be clear and concise.
- 2.2.2 We were informed at the time of the audit, that since March 2020 Service Centre are accepting identification verification documents via email, in place of physical documentation being taken to the Contact Centre.
- 2.2.3 The administration of DBS for schools was also examined and it was confirmed that whilst DBS records for school staff are monitored centrally, schools are responsible for reviews in relation to Volunteers and School Governors, with no central control over the currency of DBS for these individuals. It is noted that the requirement for School Governors to have a DBS is up to the individual school.
- 2.2.4 Enquiries were made regarding the compliance with Baseline Personnel Security Standards (BPSS). It was noted that all users of the Public Services Network have to be validated to BPSS, however this was a one-off exercise previously carried out. We were informed that a renewal check is not necessary.
- 2.2.5 A sample of ten employees expected to have undergone a BPSS check were reviewed. Testing satisfactorily confirmed that BPSS checks had been undertaken for all sampled.

2.3 Review of Posts

- 2.3.1 We were informed by the Service Centre Helpdesk & DBS/SCW Manager that posts that don't have any DBS requirements attached to them in Oracle are reported on an exception report that is produced monthly. This exception report is reviewed by Service Centre staff every month, with the necessary update being recorded in Oracle. A sample of 10 posts recorded on the November report were reviewed to ensure the DBS status details had now been updated in Oracle. All tested satisfactorily. We were also informed, that there is going to be a review of all positions on Fusion once the new system goes live.

2.4 Reports and Monitoring

2.4.1 A review of the renewal report for November 2022 highlighted that there are currently 163 employees that require a DBS. Of these, 127 are active employees, the remaining employees were not currently in work due to Sickness, Maternity or Career Break.

2.4.2 Sample testing on the November renewal report identified a number of anomalies which meant that the information could not be relied on fully. For example, the report does not appear to accurately identify the number of days the DBS has been outstanding for each employee where there has been a change in assignment. Testing carried out in 2.7 below, gives more examples of the issues found. As a result, it is very difficult to accurately identify the number of active employees across the Council requiring DBS checks without reviewing every single employee that appears on the report.

2.5 DBS Checks – New Starters

2.5.1 Records for a sample of ten new starters requiring DBS checks were examined to ensure a check had been conducted and Oracle had been updated with the required information. The following was found:

- a) Six cases tested satisfactorily.
- b) For employee number [REDACTED], the DBS return received on 9 October 2022 had not been entered onto Oracle as at the 6 December 2022 however it had been marked as complete on the Pending Certificates Report. We were informed that this was due to an administrative error.
- c) The remaining three cases did not have a RA1 (Risk Assessment) in place:

Employee No:	Date of Appointment	Date DBS received	RA1 form received
[REDACTED]	01 September 2022	17 September 2022	Yes, but received on 27 September 2022
[REDACTED]	07 November 2022	11 November 2022	No RA1 received
[REDACTED]	20 September 2022	29 September 2022	No RA1 received

2.6 DBS Checks – Existing Employees (Community Alarm Stores/Taxi/ Waste Drivers/Operatives)

2.6.1 A sample of records for employees stratified across the Council known to require DBS checks was undertaken. Testing satisfactorily confirmed that a DBS was in place for each employee reviewed.

2.6.2 Enquiries were made by Governance and Audit Committee in February 2022 in relation to staff DBS requirements within Community Alarm / Community Equipment stores, Taxi and Waste drivers/operatives.

2.6.3 The DBS Manager reviewed these posts, and it was stated that a DBS is not required for the assignments within Community Alarm / Community Equipment stores or for Waste drivers/operatives.

2.6.4 Taxi drivers DBS requirements were also reviewed, and the following was found:

- a) Taxi drivers are DBS approved by the Taxi Licensing Team in the Civic Centre. A Taxi driver who is DBS-approved by the Council is automatically 'dual badged' so can work on both the Council's Home to School taxi contracts and undertake routine taxi work.
- b) The terms & conditions of the Taxi Framework Contract state that contractors providing taxis must only use Drivers and Passenger Assistants who have a valid DBS.
- c) The Integrated Transport Unit maintain lists of the employees used by taxi contractors on school contracts. This is updated every six months.
- d) The Highways & Transportation Service has a Survey Team which undertakes routine spot checks at schools of taxi drivers and passenger assistants to ensure they are all DBS-approved.
- e) Officers in the Integrated Transport Unit have access to the Taxi Licensing Team's records of approved taxi drivers on the FLARE system and the Integrated Transport Unit, carries out DBS checks (on request) for taxi passenger assistants.

2.7 DBS Renewals

2.7.1 The process in place for the monitoring of renewals was found to be satisfactory. Reports are run on a monthly basis and sent to the relevant Service Managers four months in advance of the employees DBS expiring.

2.7.2 A sample of 15 employees was taken from the DBS renewal report (November 2022). The following was found:

- a) Two employees ([REDACTED]) had commenced new jobs within the Council, the report identified that their DBS' were significantly overdue, however, this was not the case. An anomaly on the report means that the incorrect DBS date was being used. Further enquiries into these two employees confirmed that DBS certificates were in place.
- b) Staff who had not been paid for a considerable period of time, as they held relief contracts appeared on the report as overdue with no current DBS in place. This related to three employees ([REDACTED]).
- c) Five active employees held a status of "waiting for applicant to fill in details" due to non-completion. It was also found that no Risk Assessment forms (RA1) had been provided. These were for employee No's: [REDACTED]
- d) Four active employees DBS applications held a status of 'awaiting ID verification' and no Risk Assessment forms (RA1) had been provided. These were for employee No's: [REDACTED]

e) The remaining sample, employee number [REDACTED], commenced a new assignment on the 1 October 2022 with the DBS being returned on 4 November 2022. It is noted however that as of 12 December 2022 Oracle had not been updated with this information. It was also found, that an RA1 was provided on the 3 September 2022 and had not been uploaded to Oracle until the 11 November 2022.

2.7.3 At the time of the audit, we were informed that an ‘overdue’ report is also issued to HR/OD officers for them to notify the relevant Service Managers of the outstanding DBS. We were informed by the Service Centre Helpdesk & DBS/SCW Manager that this process is now working more efficiently than previously.

2.7.4 Schools receive renewal reports every month, and copies of the overdue lists are sent to the HR Officers. A sample of five schools were examined and it was found that a total of nine employee DBSs had expired and not yet been renewed. These employees would have appeared on the EBulk reports four months before their DBS expiry date in order to allow sufficient time for the renewal process. The school employees in the sample without a valid DBS are recorded in the table below:

School	Employee No.	Date of DBS Expiry
Bishop Vaughan Comprehensive	[REDACTED]	12 July 2022
Bishop Vaughan Comprehensive	[REDACTED]	5 September 2022
Bishop Vaughan Comprehensive	[REDACTED]	16 October 2022
Brynmill Primary	[REDACTED]	4 November 2022
Gowerton Primary	[REDACTED]	11 October 2022
Gowerton Primary	[REDACTED]	1 November 2022
Pontybrenin Primary	[REDACTED]	4 October 2022
Pontybrenin Primary	[REDACTED]	28 June 2022

2.7.5 In seven of the eight cases reported in 2.7.4 above, risk assessments were required but there was no record to show that they had been undertaken. In the one remaining sample, a risk assessment had been conducted by the school, however, there was a delay in this being received by the Service Centre.

2.8 Payments to Powys County Council

2.8.1 A sample of five paid invoices was selected from Oracle. Testing was undertaken to confirm the ordering and payment of invoices had been carried out in compliance with the Council’s Accounting Instructions, Contract Procedure Rules (CPR’s) and Spending Restrictions. All tested satisfactorily.

2.9 Re-charging of Departments

2.9.1 The process used for the recharging of service departments was examined and the following was found:

- a) Re-charging was up to date and will be carried out on a monthly basis ongoing.
- b) There is no reconciliation process of expected income due.

2.10 System Access / Confidentiality

- 2.10.1 A list of officers with verification/system administration access was provided for examination. It was confirmed that there are sufficient staff with system administrator access / DBS verification access to ensure business continuity is maintained.
- 2.10.2 The DBS (E-bulk) system is a web-based application; however, we were informed that paper applications can be used if the web-based system was to be inaccessible for any reason.

2.11 GDPR and Data Retention

- 2.11.1 We were informed by the Service Centre Helpdesk & DBS/SCW Manager that all staff in the team had completed the mandatory GDPR training provided by the Council.
- 2.11.2 We were informed that there were no records being held by the service that were outside of the Council's official retention period.

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 also the basis for each of the Assurance levels is noted in **Appendix 1**.
- 3.4 Based on the audit testing undertaken, it was found that some procedures were operating satisfactorily, however, there were key areas that require attention and improvement. These relate to DBS certificates for new and existing employees. This has resulted in two high, one medium, one low and two good practice recommendations.
- 3.5 As a result, an Assurance Level of '**Moderate**' has been given. This means that the ineffective controls identified represent a significant risk to the achievement of system objectives.
- 3.6 We will contact you in due course to confirm that you have implemented the agreed recommendations.
- 3.7 This audit was conducted in conformance with the Public Sector Internal Audit Standards.

Appendix 1**Classification of Audit Recommendations**

Recommendation	Description
High Risk	Action by the client that we consider essential to ensure that the service / system is not exposed to major risks .
Medium Risk	Action by the client that we consider necessary to ensure that the service / system is not exposed to significant risks .
Low Risk	Action by the client that we consider advisable to ensure that the service / system is not exposed to minor risks .
Good Practice	Action by the client where we consider no risks 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.

**SWANSEA COUNCIL
MANAGEMENT ACTION PLAN
HUMAN RESOURCES AND SERVICE CENTRE
DISCLOSURE AND BARRING SERVICE (DBS) 2022/23**

REPORT REF	RECOMMENDATION	CLASS	AGREED ACTION/ COMMENTS	RESPONSIBILITY FOR IMPLEMENTATION	IMPLEMENTATION DATE
2.5.1 (b)	Oracle should be updated upon receipt of DBS disclosure information in a timely fashion. Staff should ensure that employee details are only highlighted as completed on the pending certificate reports once the details have been input onto Oracle. (Previous audit recommendation)	LR	Oracle will be updated upon receipt of a DBS disclosure in a timely manner and marked completions will be done after the details are input into Oracle. The DBS certificate report is a daily task to complete.	ELJ	Immediately
2.5.1 (c), 2.7.2 c) & 2.7.2 d) & 2.7.5	A robust process should be established to ensure that all employee(s) have a risk assessment (RA1) conducted and sent to the Service Centre in the interim period whilst awaiting receipt of the DBS. (Previous audit recommendation)	HR	Risk assessment templates are provided to managers/Head teachers whilst awaiting receipt of a DBS certificate and reminders for completion are issued 120 days before the date of DBS expiry.	ELJ	September 2023
2.7.2 a) & b) & 2.4.2	Consideration should be given to update/amend the exceptions report to ensure the output is accurate and reliable. (Previous audit recommendation)	GP	The report will be looked at once reporting is fully functional in FUSION.	ELJ	September 2023

Appendix B

REPORT REF	RECOMMENDATION	CLASS	AGREED ACTION/ COMMENTS	RESPONSIBILITY FOR IMPLEMENTATION	IMPLEMENTATION DATE
2.7.2 e)	<p>DBS returns should be updated on Oracle in a timely manner to ensure the correct status is held and to avoid employee details being listed on the renewal spreadsheet.</p> <p>RA1 forms received from service departments should be uploaded to Oracle in a timely manner.</p>	MR	<p>DBS returns will be updated on Oracle in a timely manner. The DBS certificate report is a daily task, and the renewal report will be explored to verify any cross duplication.</p> <p>Risk assessments will be uploaded to Oracle in a timely manner, and this will be included as a daily task.</p>	ELJ	Immediately
<p>2.7.4</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 81</p>	<p>A robust system should be put in place to ensure that DBS renewals are completed for all staff prior to expiry.</p> <p>A full review of all school employees should be undertaken to ensure that all DBS' are current/renewed as soon as possible.</p>	HR	<p>Notification is issued to managers and employees 4 months prior to a DBS certificate expiring to give sufficient time for the renewal check to be undertaken. Reminders are issued every 5 calendar days.</p> <p>The review of school employees will be completed by September 2023.</p>	ELJ	September 2023
2.9.1 b)	A reconciliation process should be implemented to ensure all expected income due/recharged income is accounted for.	GP	This will be explored further in conjunction with Cash Management.	ELJ	September 2023