



WALES AUDIT OFFICE
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Follow-up review of corporate arrangements for the safeguarding of children – **Rhondda Cynon Taf County Borough Council**

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This document is also available in Welsh.

The team who delivered the work comprised Ian Phillips, Justine Morgan and Colin Davies under the direction of Huw Rees.

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Summary report

What we reviewed and why

- 1 We undertook this review to seek assurance that the Council has effective corporate arrangements in place for safeguarding children. We considered the findings of our 2014 report into the Council's arrangements to support safeguarding of children¹. We also considered the Council's progress in implementing the recommendations contained in the Auditor General's report, 'Review of Corporate Safeguarding Arrangements in Welsh Councils' (July 2015)².
- 2 We undertook the review between May and July 2019.

What we found

- 3 Our review sought to answer the question: 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?
- 4 Overall, we found that: The Council has met, or partially met, most of our previous recommendations and proposals for improvement, but we have identified some further proposals for improvement to strengthen aspects of the Council's corporate safeguarding arrangements.

Proposals for Improvement

Exhibit 1: proposals for improvement

The table below sets out the proposals for improvement that we have identified following this review.

Proposals for improvement	
P1	<p>Strengthen the Corporate Safeguarding Policy in the following ways:</p> <ul style="list-style-type: none">• Provide information on topics that have safeguarding implications such as modern day slavery, trafficking, child sexual exploitation, counter terrorism and the risk of radicalisation, the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and self-harm;• Cross-refer to the Council's Disclosure and Barring Service (DBS) Policy; and• Clarify the role and status of the Corporate Safeguarding Working Group.

¹ Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Rhondda Cynon Taf County Borough Council**, October 2014

² Auditor General for Wales, **Review of Corporate Safeguarding Arrangements in Welsh Councils**, July 2015

Proposals for improvement

- P2 Strengthen the Recruitment and Selection Procedures in the following ways:
- Refer to safeguarding as a key commitment in the opening section of the procedures;
 - The job descriptions section could refer to safeguarding for relevant posts;
 - Specify that job adverts for posts that require a DBS check will contain an explicit statement on safeguarding;
 - The induction section could refer to safeguarding; and
 - The Corporate Safeguarding Policy and the DBS Policy should be referenced in the 'Related Policies' section.
- P3 The Council should gather contractual monitoring information from across all Council Directorates to ensure they are all robustly monitoring safeguarding related actions.
- P4 The Council should improve its approach to safeguarding training in the following ways:
- Accelerate the rate of compliance with the completion of its mandatory safeguarding training and the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 training;
 - Clarify when mandatory safeguarding training needs to be refreshed;
 - Consider ways in which it could extend its safeguarding training offer, for example to taxi drivers and to those working in the night time economy;
 - Improve its monitoring of safeguarding training compliance; and
 - Clarify how soon new starters must complete the mandatory safeguarding training.
- P5 The Council should consider producing performance measures (for example in respect of DBS check compliance) to enhance the performance information that goes to scrutiny and aid transparency.
- P6 The Corporate Safeguarding Working Group should have oversight of corporate safeguarding risks from across the Council.

Detailed report

Assessment of progress against the recommendations from our 2015 report

The Council has met, or partially met, most of our previous recommendations and proposals for improvement, but we have identified some further proposals for improvement to strengthen aspects of the Council's corporate safeguarding arrangements

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<p>R1 Improve corporate leadership and comply with the Welsh Government policy on safeguarding through:</p>	
<ul style="list-style-type: none"> • the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; 	<p>Met: The Chief Executive fulfils this role.</p>
<ul style="list-style-type: none"> • the appointment of a lead member for safeguarding 	<p>Met: The Leader of the Council fulfils this role.</p>
<ul style="list-style-type: none"> • regularly disseminating and updating information on these appointments to all staff and stakeholders 	<p>Met, but an area for improvement identified.</p> <ul style="list-style-type: none"> • The Council's Corporate Safeguarding Policy provides information about the roles of the senior leader officer and lead member for corporate safeguarding. There is a link to the Corporate Safeguarding Policy on the Council's intranet and website (although the version on the Council's website is not the latest iteration as it has recently been updated).

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<ul style="list-style-type: none"> • The Leader's role description on the Council website sets out his corporate safeguarding responsibilities. • The Council have advised us that corporate briefing sessions as part of induction includes information about these roles. • There is an opportunity, with the recent appointment of the Chief Executive to the role of corporate safeguarding, to reinforce staff awareness of this role. For example, the corporate safeguarding intranet pages could contain information about the role of the lead officer and lead member for corporate safeguarding, and it is also an opportunity to ensure this is well communicated to those staff who are not online.
<p>R2 Ensure there is a corporate-wide policy on safeguarding covering all council services to provide a clear strategic direction and clear lines of accountability across the council</p>	<p>Met, but a proposal for improvement identified.</p> <ul style="list-style-type: none"> • The Council has a corporate safeguarding policy and it is clear on roles and responsibilities with the following identified exception: <ul style="list-style-type: none"> – The Council has a Corporate Safeguarding Working Group that meets periodically to discuss corporate safeguarding matters, although its role and terms of reference are unclear and the safeguarding policy does not mention the Group. – • The Council publishes the corporate safeguarding policy on its intranet and has stipulated that for those staff who do not have access to a computer, their Managers will make available an easy to read briefing note. • We have identified that the corporate safeguarding policy could be strengthened as set out in P1 above.
<p>R3 Strengthen safe recruitment of staff and volunteers by:</p>	
<ul style="list-style-type: none"> • ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe 	<p>Met, but a proposal for improvement identified.</p> <ul style="list-style-type: none"> • The Council has a DBS policy that applies to staff and volunteers.

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<p>recruitment policies cover all services that come into contact with children;</p>	<ul style="list-style-type: none"> • All staff need to go through pre-employment screening. The Council does not have many volunteers outside of schools, but in schools volunteers must provide references and have DBS checks. • The Council has Recruitment and Selection Procedures but there is scope to strengthen it as set out in P2 above.
<ul style="list-style-type: none"> • creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and 	<p>Partially met.</p> <ul style="list-style-type: none"> • All staff DBS check information is held on the Council's system called 'Vision'. Beyond that, the Council recognise that they haven't got a single integrated system and some information is held at Directorate level, and they have identified this as an ongoing area for improvement.
<ul style="list-style-type: none"> • requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement 	<p>Met, with two areas for improvement identified.</p> <ul style="list-style-type: none"> • The Council are confident that it has strong arrangements for the oversight of third party contractors. The Council provided an example of its commissioning arrangements where as part of the monitoring process they ask for evidence of DBS checks and safeguarding training compliance. • The Council has provided contractual examples of safeguarding related clauses which are generally sound, although we have identified a minor enhancement that could be made by specifically referencing DBS checks in the contract wording. This is implicit and is monitored as part of contract monitoring but could be made slightly clearer. • The Council recognises that it needs to get better information from all Directorates to be certain that the contract monitoring across all Directorates' is robustly checking on safeguarding matters as part of its contract monitoring.
<p>R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p>	

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<ul style="list-style-type: none"> ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes; 	<p>Met, with proposals for improvement identified.</p> <ul style="list-style-type: none"> Safeguarding training is mandatory for all staff and is available via e-learning or face to face training. As at June 2019 6,142 out of 10,563 employees have completed safeguarding training. The Council acknowledges this gap and says this will now need to be managed using a targeted approach. It is a Welsh Government requirement that training in respect of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) is mandatory for all staff. The Council have not confirmed what percentage of their staff have completed this training. During induction, new starters are signposted to the corporate safeguarding policy and that policy is part of the induction checklist. The Council have not confirmed how soon after starting a new starter needs to complete the mandatory safeguarding training and they need to ensure checks are carried out that the training has been done. The Council acknowledges that it does not currently have arrangements in place specifying when safeguarding refresher training is required. In 2016, the role descriptions of members were updated to include responsibility for safeguarding and the Council's Corporate Safeguarding Risk Register records that following the local government election in 2017 training was delivered to all members. On 16 January 2019, thirty members attended safeguarding training prior to a meeting of Council.
<ul style="list-style-type: none"> creating a corporate-wide system to identify, track and monitor compliance on attending safeguarding training in all council departments, elected members, schools, governors and volunteers; and 	<p>Not met.</p> <ul style="list-style-type: none"> The Council acknowledges that they do not have an easily accessible database for training and to obtain compliance statistics they have to undertake a manual compliance exercise. The Council's Corporate Safeguarding Risk Register states 'The ability to demonstrate actual training delivered has improved since the original identification of this risk, however the use of a unique identifier for each individual that received the training can be improved. The database held

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>within the Community & Children's Group doesn't always record the individual's employee number for example. As a result of this, the ability to use the training data to target areas of the Council where additional training is required is not as robust as desired'.</p> <ul style="list-style-type: none"> • The Corporate Safeguarding Risk Register also states 'Depending on how and where the training is delivered from, records are held in two systems - RCT Source and a database within the Community & Children's Group'. • Training information is held in various places. The Social Care workforce development team hold information about volunteers. Member information is held within Democratic Services and information in respect of staff who have had face to face training may be held at Directorate level. • The Council's e-learning training information is held in one place. • Education do a safeguarding self-evaluation and will audit what training has been done. However, the information held in the Education Directorate is held on various spreadsheets. Schools information is in one place and governor information is in another. The Council recognises it could be more efficient in how it holds this information. The training compliance of volunteers in schools is not collected centrally, although can be tested as part of Internal Audit visits.
<ul style="list-style-type: none"> • requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and young people to undertake safeguarding training. 	<p>Met: The Council has provided contractual examples which mandate this requirement.</p>

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<p>R6³ Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and council-wide set of performance information covering:</p> <ul style="list-style-type: none"> • benchmarking and comparisons with others; • conclusions of internal and external audit/inspection reviews; • service-based performance data; • key personnel data such as safeguarding training, and DBS recruitment checks; • the performance of contractors and commissioned services on compliance with council safeguarding responsibilities. 	<p>Partially met, with area for improvement identified.</p> <ul style="list-style-type: none"> • The Council reported to the Overview and Scrutiny Committee on 5 February 2019 on its corporate safeguarding arrangements. In 2016 and 2017 progress updates against our earlier safeguarding report, went to scrutiny and Audit Committee respectively, but the Council does not regularly report to scrutiny against the criteria listed in this recommendation. • The Council commented that benchmarking is difficult as there is not a nationally agreed set of indicators. • The aforementioned February 2019 report contained performance measures on overall safeguarding training compliance for staff and members, but it was not broken down to a service level and it did not include any DBS recruitment check performance information. • The Council are looking to develop their service self-evaluations in order to gather more service specific safeguarding performance data. • The Council monitors the performance of contractors and commissioned services on compliance with council safeguarding responsibilities through its contract monitoring arrangements.
<p>R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p>	<p>Partially met:</p> <ul style="list-style-type: none"> • Internal Audit have not carried out any reviews in respect of the Council corporate safeguarding arrangements. • Corporate Safeguarding Arrangements was in Internal Audit's 2016-17 annual audit plan and in its 2018-19 annual audit plan, but this work was described as 'consultancy' as opposed to 'assurance' and there was no written output from this work. The Operational Audit Manager at that time was part of the Corporate Safeguarding Working Group.

³ Welsh Government were responsible for responding to recommendation 5 so that is not included above

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<ul style="list-style-type: none"> • Safeguarding is a feature of individual school audits. Schools and Community safeguarding arrangements was in the Internal Audit Annual Audit Plan 2017-18 and a thematic review of comprehensive schools safeguarding arrangements was in the Internal Audit Annual Audit Plan 2018-19. • Internal Audit may wish to consider incorporating reviews of the Council's corporate safeguarding arrangements, or aspects of those arrangements, into their work programme.
<p>R8 Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council.</p>	<p>Partially met, with a proposal for improvement identified.</p> <ul style="list-style-type: none"> • The Council introduced a Corporate Safeguarding Risk Register in 2016 and it has recently been updated. • The Council has Service Delivery Plans as opposed to service-level risk registers. The Council has stated that safeguarding risks are considered as part of the service self-evaluation process, but they will not necessarily need to feature within Service Delivery Plans. • The Corporate Safeguarding Working Group should have oversight of corporate safeguarding risks from across the Council.

Assessment of progress against the proposals for improvement from our 2014 report

Proposals for improvement in our 2014 local report issued to the Council in October 2014.	Wales Audit Office assessment of Council's progress
P1 Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding	See narrative against recommendation 2 above
P2 Ensure all safeguarding risks are identified; ensure corporate and service level risks are integrated; and agree actions to mitigate these	See narrative against recommendation 8 above
P3 Improve the range, quality and coverage of safeguarding performance reporting to provide adequate assurance that systems are working effectively	See narrative against recommendation 6 above.
P4 Ensure all elected members and staff who come into contact with children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding	See narrative against recommendation 4 above.

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