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Auditor General for Wales

# Review of Corporate Arrangements for Safeguarding – **Ceredigion County Council**

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This document is also available in Welsh.

The team who delivered the work comprised Richard Hayward, Nigel Griffiths and Jeremy Evans under the direction of Huw Rees.

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# Summary

## What we reviewed and why

- 1 We reviewed Ceredigion County Council's (the Council's) corporate arrangements for the safeguarding of children and adults. While certain governance arrangements for safeguarding operate regionally – through the Mid and West Wales Safeguarding Board – the focus of our review was on the Council's own corporate arrangements.
- 2 We undertook this review to seek assurance that the Council has effective corporate arrangements in place for safeguarding. We 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)<sup>1</sup>. We also considered the findings of our 2016 follow-up report into the Council's arrangements to support safeguarding of children<sup>2</sup>.
- 3 We undertook the review during February and March 2019.

## What we found

- 4 Our review sought to answer the question: Do the Council's governance and management arrangements provide assurance that children and adults are safeguarded?
- 5 Overall, we found that: **The Council is implementing improved governance and management arrangements that should provide increased assurance that children and adults are safeguarded, although arrangements in some areas need further strengthening.** We reached this conclusion because:
  - The revised corporate safeguarding policy updates the Council's safeguarding arrangements, but action is needed to improve governance and procedures in some areas:
    - The roles and responsibilities of the Local Operational Group, Designated Safeguarding Officer Group and the Designated Safety Officers need to be clarified and strengthened;
    - The Overview and Scrutiny Coordinating Committee is not given the opportunity to consider all relevant safeguarding reports;
    - Whilst the Council includes safeguarding as a risk in its corporate risk register the identification of safeguarding risks within services is

<sup>1</sup> A copy of the report is available on the Wales Audit Office website [www.audit.wales](http://www.audit.wales)

<sup>2</sup> Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children Follow Up – Ceredigion County Council**, Wales Audit Office, June 2016

weaker, this needs to be considered in the Council's current review of how it identifies and records risk;

- The Council has an effective Disclosure and Barring Service and safe recruitment process;
  - Safe recruitment practices are considered as part of the Council's procurement process but post contract monitoring of contractor safeguarding arrangements could be strengthened; and
  - The Council has effective arrangements for providing safeguarding training to councillors, staff and volunteers.
- The Council's arrangements to monitor and evaluate safeguarding performance do not fully comply with its safeguarding policy.
  - The Council's arrangements for providing assurance on the effectiveness of its safeguarding arrangements need further development.

## Proposals for improvement

### Exhibit 1: proposals for improvement

Proposals for improvement	
The Council should:	
P1	Clarify and strengthen the roles and responsibilities of the Local Operational Group, Designated Safety Officer Group and the Designated Safety Officers.
P2	Ensure the Overview and Scrutiny Coordinating Committee receives all key safeguarding reports for them to consider for inclusion in their forward work programmes.
P3	Review its arrangements for identifying and reporting service level safeguarding risks.
P4	Implement procedures for the regular monitoring of contractors and commissioned services compliance with the Council's safeguarding requirements.
P5	Revise the safeguarding performance management framework to ensure reporting on: <ul style="list-style-type: none"> <li>• a full range of performance information on adult safeguarding; and</li> <li>• the 12 national and local performance indicators specified in the safeguarding policy.</li> </ul>
P6	Revise the structure and content of the Strategic Safeguarding Board's Annual Report and Action Plan to provide more detail on: <ul style="list-style-type: none"> <li>• corporate safeguarding performance;</li> <li>• key achievements during the year and opportunities for improvement; and</li> <li>• priorities and planned work for the following year.</li> </ul>

**Proposals for improvement**

- |    |   |
|----|---|
| P7 | Implement a programme of Internal Audit reviews of safeguarding arrangements and procedures.                              |
| P8 | Revise its arrangements for reporting and monitoring the implementation of recommendations in Wales Audit Office reports. |

# Detailed report

The Council is implementing improved governance and management arrangements that should provide increased assurance that children and adults are safeguarded, although arrangements in some areas need further strengthening

The revised corporate safeguarding policy updates the Council's safeguarding arrangements, but action is needed to improve governance and procedures in some areas

The roles and responsibilities of the Local Operational Group, Designated Safeguarding Officer Group and the Designated Safety Officers need to be clarified and strengthened

- 6 The Council approved its revised corporate safeguarding policy on 13 December 2018. The update reflected changes to safeguarding roles and responsibilities following the corporate restructure and took account of recent legislation including the Modern Day Slavery Act 2015 and Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. The policy applies to all staff, councillors and volunteers.
- 7 The safeguarding policy describes the governance arrangements for managing safeguarding in the Council. It clearly identifies the Director of Social Services as the senior lead officer for safeguarding and the Cabinet member for Children's Services and Culture as the lead member.
- 8 There are three main groups responsible for the strategic and operational management of safeguarding in the Council:
  - Strategic Safeguarding Board – responsible for ensuring the Council has robust arrangements for safeguarding;
  - Local Operational Group (LOG) - Children and Adults – responsible for monitoring, analysing and reporting on safeguarding practice and performance; and
  - Designated Safeguarding Officers Group (DSOG) – responsible for disseminating and sharing safeguarding information across the Council and monitoring and reporting safeguarding performance at a service level.
- 9 As part of our work, we attended the March meeting of the LOG. A wide range of organisations including the Council, Hywel Dda University Health Board and Dyfed Powys Police were in attendance. Topics discussed included performance

management supported by a comprehensive report on the performance of safeguarding services for children.

- 10 There was, however, a lack of information on the performance of adult safeguarding. This is referred to in more detail later in the report (paragraphs 26-28). Without this information the LOG is not able to fully discharge its role for adult safeguarding services.
- 11 Membership of the DSOG comprises a Designated Safeguarding Officer (DSO) from each service. The Council's intention is to use the DSOG and the network of DSOs to assist in managing and coordinating safeguarding matters in individual services. The DSOs are listed in the safeguarding policy and in the safeguarding section of the Council's employee handbook. However, several officers we spoke to did not know the name of their DSO and were, as a result, unsure who to contact on safeguarding issues.
- 12 The safeguarding policy identifies several tasks required for each service, to be developed, managed and coordinated by the DGOG and DSOs. These include service specific safeguarding policies, audit programmes and service specific performance measures. However, these are not routinely produced.

**The Overview and Scrutiny Coordinating Committee is not given the opportunity to consider all safeguarding reports**

- 13 The Overview and Scrutiny Coordinating Committee is responsible for scrutinising safeguarding matters. However, the Committee does not receive all the key safeguarding reports that are presented to the three management groups. Some reports, including the Director of Social Services Annual Report and the Annual Report on Adults Safeguarding, go directly to the Cabinet, or via the Overview and Scrutiny Healthier Communities Committee, and are not seen by the Overview and Scrutiny Coordinating Committee.
- 14 For councillors to provide effective challenge over the full range of the Council's safeguarding activities it is important that the Overview and Scrutiny Coordinating Committee received all key safeguarding reports. It can then consider the need for scrutiny and challenge within its forward work programme.



Whilst the Council includes safeguarding as a risk in its corporate risk register the identification of safeguarding risks within services is weaker this needs to be considered in the Council's current review of how it identifies and records risk

- 15 The Council's corporate risk register is a standing item at the weekly meetings of the Leadership Group and highlights safeguarding risks for both adults and children. The register includes detailed mitigating actions for each of the safeguarding risks together with an update on progress. Implementation of the governance and management arrangements in the safeguarding policy is seen as one of the main actions to reduce risks.
- 16 The Council's arrangements for managing service level safeguarding risks are less well developed with only children's services including safeguarding as a risk in its 2018-19 risk register. Safeguarding risks should be included, as a minimum, in both children and adults service risk registers and/or business plans and be considered for inclusion in all the Council's other service risk registers and/or business plans. The Council is reviewing its approach to identifying and recording risks as part of the implementation of the new risk management system in 2019.
- 17 The safeguarding policy includes the requirement that every service needs to consider safeguarding in the business planning process. The officers we spoke to felt that DSOs could assist in identifying service level safeguarding risks and their mitigating actions.

The Council has an effective Disclosure and Barring Service and safe recruitment process

- 18 The Council has a Disclosure and Barring Service (DBS) and safe recruitment policy approved by Cabinet in November 2017. It covers all employees, councillors, school governors, volunteers and contracted services staff.
- 19 The Council has clear arrangements for undertaking DBS checks. The recruiting manager and HR department identify if a job or role requires a basic or enhanced DBS check and, if so, at what level. The policy requires that enhanced level DBS checks are undertaken for any job/role where individuals work with vulnerable groups of children or adults. Once the level of DBS check is agreed for a job/role, the Council records this information on the central HR system to save time if the post becomes vacant again.
- 20 The corporate HR system stores the results of DBS checks in the recruitment records for staff, councillors, school governors and volunteers. The system generates reports that show when DBS checks expire and need to be renewed on a three-year cycle.
- 21 Any adverse information received during a DBS check is assessed against 11 criteria which include what level of supervision the job/role receives, the length of time since the offence and whether the job/role involves one to one contact with children or other vulnerable groups. The assessment is signed off by the applicant, HR and the relevant head of service and retained on the applicant's personal file.

Safe recruitment practices are considered as part of the Council's procurement process but post contract monitoring of contractor safeguarding arrangements could be strengthened

- 22 The Council delivers a number of its services through contracting and commissioning arrangements with third-party organisations. Safeguarding is considered as part of the tendering and contract stages for these services. The tender documents require contractors to undertake enhanced DBS checks on their workforce and the contract is not awarded unless and until this process has been completed. The Council can support smaller organisations by arranging DBS checks on their behalf. Contractors are also required to provide evidence of their internal safeguarding policies including any on child protection and the protection of vulnerable adults. The tender documents detail the process for contractors to report any safeguarding issues and concerns to the Council.
- 23 The monitoring of contractor arrangements to ensure compliance with DBS requirements is the responsibility of the service managing the contract. This includes monitoring the date of DBS renewals for posts that require new DBS checks every three years. However, the existing arrangements are not sufficiently robust to provide the Council with the regular on-going assurance it needs in this area. There are, for example, no regular, random 'spot checks' undertaken to assess the effectiveness of contractors' DBS arrangements and whether their DBS records are up to date.

The Council has effective arrangements for providing safeguarding training to councillors, staff and volunteers

- 24 The Council's programme of safeguarding training is well regarded by all the officers and councillors we spoke to. Basic safeguarding awareness training is included as part of the induction process for staff and councillors along with other compulsory modules that includes whistleblowing and violence against women, domestic abuse and sexual violence. The mandatory e-learning courses on basic safeguarding training were introduced in September 2018 and are being implemented over three years for existing staff and as part of the induction process for new appointments. Staff with designated safeguarding responsibilities will undergo refresher training every three years.
- 25 Information on safeguarding training is held on the Council's HR system and monitored by the Learning and Development Team. As at February 2019, 680 staff had completed the mandatory adult safeguarding training and 752 the children's safeguarding training. All 42 councillors have completed level one children and adults safeguarding training. In addition, five councillors have also completed level two training in children safeguarding. Training has also been provided on safeguarding awareness for taxi drivers, safeguarding mental health in schools and child sexual abuse awareness and prevention for professionals and parents and carers.

## The Council's arrangements to monitor and evaluate safeguarding performance do not fully comply with its safeguarding policy

- 26 Performance information on safeguarding is reported to, and challenged at, various levels within the Council including the Leadership Group, Joint Cabinet/Leadership Group, Strategic Safeguarding Board, LOG and Overview and Scrutiny Coordinating Committee. The information provided should give a comprehensive picture of performance across both children and adults safeguarding. However, the reports focus mainly on the safeguarding of children with little information on performance in adults safeguarding. The officers we spoke to recognised this and felt it was in part due to the requirements for reporting children safeguarding performance being well understood whereas equivalent arrangements for adults are still evolving following the Social Services and Well-being (Wales) Act 2014.
- 27 The Council's safeguarding policy contains a high-level set of 12 corporate national and local performance indicators including 'percentage of staff that receive safeguarding training as part of the induction' and 'percentage of councillors attending safeguarding training'. The policy requires performance against the 12 indicators be reported quarterly to the Strategic Safeguarding Board and included in their Annual Report. This is not happening. Officers and councillors we spoke to were not aware of the requirements of the policy regarding reporting performance against the 12 indicators.
- 28 The performance management reports could be improved by including more comparative data. The quarterly report on children is very detailed and provides some trend information but there is an absence of comparisons with the performance of other councils.

## The Council's arrangements for providing assurance on the effectiveness of its safeguarding arrangements need further development

- 29 One of the main aims of the Strategic Safeguarding Board is to assist in providing assurance to the Council that its safeguarding work is being carried out in an 'effective and robust manner'. However, the 2017-18 Annual Report does not provide the necessary level of detail to provide such an assurance. It contains little information on performance, what was achieved during the year and what improvements have been made/are required to the Council's safeguarding arrangements.
- 30 The 2017-18 Annual Report includes the Board's work plan. The work plan is 'from September 2016' and includes completed projects which started in previous years.

There is a lack of detail around current year activities. Members of the Board we spoke to advised that the 2018-19 work plan will be more focused on progress against the current year's priorities and monitored quarterly by the Overview and Scrutiny Coordinating Committee.

- 31 Safeguarding is a standing agenda item for the Council's Leadership Group. Senior officers told us that having safeguarding as a standing item on the agenda ensures regular discussion and consideration of safeguarding issues.
- 32 The Council undertakes a number of safeguarding quality assurance projects including independent file audits that take place within the services and themed corporate safeguarding audits. The most recent themed audit was a joint children and adults' audit of the 'signs of safety' framework. The Council also undertakes practice reviews, learning events and is embedding its 'signs of safety' approach.
- 33 Internal Audit have not carried out a formal independent assessment of the Council's corporate safeguarding arrangements. However, they routinely undertake safeguarding testing whilst conducting their reviews, including checking all appropriate staff have provided the required DBS documentation at establishments such as schools, leisure centres and residential homes. They also undertook an audit of the Council's Children's Performance Licencing System during 2018-19. The Corporate Manager – Internal Audit and the Corporate Lead Officer – Children Services attended a recent meeting of the Strategic Safeguarding Board to discuss the audit of safeguarding processes and procedures. Internal Audit will continue undertaking a rolling programme of the Council's safeguarding practices during 2019-20.
- 34 The Council has not fully implemented all the recommendations in the Auditor General's 2015 report 'Review of Corporate Safeguarding Arrangements in Welsh Councils'. **Appendix 1** includes the eight recommendations from the national report and an assessment of the Council's progress against each. Recommendations 1, 2, 6 and 8 have only been partially implemented and the Council is only acting to address recommendation 7 this year. If the Council had fully implemented the recommendations many of the issues raised in this report would have been addressed.

# Appendix 1

## Wales Audit Office assessment of Ceredigion County Council's progress against the recommendations contained in the report of the Auditor General, 'Review of Corporate Safeguarding Arrangements in Welsh Councils' (July 2015)

Recommendations from the national report	Wales Audit Office assessment of Ceredigion County Council's progress in the implementation of the recommendations contained in the national report
<p>R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ul style="list-style-type: none"> <li>• the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements;</li> <li>• the appointment of a lead member for safeguarding; and</li> <li>• regularly disseminating and updating information on these appointments to all staff and stakeholders.</li> </ul>	<p>Partly.</p> <p>The role of the DSOG and DSOs in updating staff and stakeholders of changes to corporate safeguarding appointments need clarifying (see also R2).</p>
<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>Partly.</p> <p>Some lines of accountability of DSOG, DSOs and Overview and Scrutiny Committees need clarifying.</p>
<p>R3 Strengthen safe recruitment of staff and volunteers by:</p> <ul style="list-style-type: none"> <li>• ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;</li> <li>• creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and</li> <li>• 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.</li> </ul>	<p>Fully.</p>

Recommendations from the national report	Wales Audit Office assessment of Ceredigion County Council's progress in the implementation of the recommendations contained in the national report
<p>R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p> <ul style="list-style-type: none"> <li>• ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;</li> <li>• 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</li> <li>• 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.</li> </ul>	Fully.
<p>R6<sup>3</sup> 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"> <li>• benchmarking and comparisons with others;</li> <li>• conclusions of internal and external audit/inspection reviews;</li> <li>• service-based performance data;</li> <li>• key personnel data such as safeguarding training, and DBS recruitment checks; and</li> <li>• the performance of contractors and commissioned services on compliance with council safeguarding responsibilities.</li> </ul>	<p>Partly.</p> <p>Issues need resolving around:</p> <ul style="list-style-type: none"> <li>• clarifying which reports go from/to the various groups including Strategic Safeguarding Board, LOG, DSOG and Overview and Scrutiny Committees;</li> <li>• reporting of a balanced set of performance indicators;</li> <li>• benchmarking and comparisons with others;</li> <li>• implementation of recommendations from external audit reviews; and</li> <li>• regular monitoring of contractors and commissioned services compliance with Council's safeguarding requirements.</li> </ul>
<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>Partly.</p> <p>Internal Audit to continue undertaking a rolling programme of reviews of the Council safeguarding practices during 2019-20.</p>

<sup>3</sup> Recommendation 5 was directed to the Welsh Government rather than Councils so it is not included in the above list.

Recommendations from the national report	Wales Audit Office assessment of Ceredigion County Council's progress in the implementation of the recommendations contained in the national report
<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>Partly.</p> <p>Good arrangements at a corporate level but more work required at a service level.</p>

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