

Progress in addressing corporate safeguarding arrangements – Powys County Council

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Summary report

What we looked at

- 1 Our audit objective was to assess the Council's progress in addressing the recommendations in the Auditor General for Wales' November 2022 review¹.
- 2 This report presents the results of our audit, which we undertook between July and August 2024. This audit:
 - does not cover all aspects of the Council's corporate safeguarding arrangements; and
 - was not a review of specific safeguarding arrangements in Education or Social Services.
- 3 This audit sought to answer the overall question – **Has the Council taken effective action to address the recommendations in the Auditor General's Follow-up Review of Arrangements for Corporate Safeguarding issued in November 2022?**
- 4 We used audit criteria² to help us assess the Council's progress and used a judgement framework to categorise the Council's progress. Both are set out in **Appendix 2**. Our cumulative audit knowledge informed the criteria and the judgement framework.

What we found

- 5 Overall, we found that **the Council has acted decisively and quickly in responding to the recommendations in our 2022 report and now has a good level of control over its corporate safeguarding arrangements.**
- 6 We found that the Council has fully implemented seven of the eleven recommendations with plans in place to address the remaining four recommendations. An important aspect of the Council's approach has been the operation of the Corporate Safeguarding Board. The Board reports regularly to scrutiny, Governance and Audit Committee and Cabinet to provide oversight of the Council's actions.
- 7 **Appendix 1** sets out our detailed judgement of the Council's progress in implementing our November 2022 recommendations.

¹ [Follow-up review of arrangements for corporate safeguarding - Powys County Council](#)

² Defined as 'what should be' according to laws or regulations, 'what is expected' according to best practice, or 'what could be', given better conditions.

- 8 This report does not contain any further recommendations. However, Appendix 1 highlights four areas where the Council now might wish to seek further assurance about the full implementation of these actions. We have called these ‘Areas for future focus’.
- 9 At the time of this audit, the Council’s primary focus was on addressing the 2022 recommendations. As a result, the Council had yet to establish a full set of success measures to understand the impact of its strengthened corporate safeguarding arrangements. We also think that this should be an area of future focus.

Background to this audit

- 10 The Welsh Local Government Association defines Corporate Safeguarding within Councils, as ‘both the policy commitment that a Council makes and the arrangements it has in place, to ensure that all of its Directorates and employees play their part in safeguarding and promoting the well-being of children and adults who may be at risk of harm.’³
- 11 **Exhibit 1** sets out the timeline of events that form the background to this audit.

Exhibit 1: background to this audit

Date	Action
2015	Audit Wales publishes the results of their examination of Councils’ corporate safeguarding arrangements. This report made recommendations in several areas.
2019	Audit Wales begins a programme of local reviews of Councils’ corporate safeguarding arrangements, including Powys County Council.
2022	In November, Audit Wales issued a Follow-up review of corporate safeguarding arrangements at Powys County Council. This audit contained eleven recommendations.

³ [WLGA \(2022\) Corporate Safeguarding Good Practice Guidance](#)

Date	Action
2023	In February, the Council's Governance and Audit Committee received an action plan setting out the Council's planned actions to address the eleven recommendations.
2024	This current audit has assessed the Council's progress in addressing those eleven recommendations.

Source: Audit Wales

Our audit methods

- 12 Our findings are based on reviewing Council documents, observing a scrutiny committee meeting, and interviews with a sample of members and senior officers with responsibility for implementing or overseeing the Council's actions. The evidence we have used to inform our assessment of the Council's progress is limited to these sources.

Our audit duties

- 13 The Council must put in place arrangements to get value for money for the resources it uses, and the Auditor General must be satisfied that it has done this. We undertook this audit to help discharge the Auditor General's duties under section 17 (2)(d) of the Public Audit (Wales) Act 2004.

Appendix 1

Judgement of progress⁴ against the recommendations

Recommendation	Judgement of progress
<p>R1 The Council needs to urgently assure itself that it has robust arrangements in place for corporate safeguarding and use appropriate mechanisms such as the governance and audit committee, scrutiny, the Corporate Safeguarding Group and internal audit to help it achieve that assurance.</p>	<p>Implemented</p> <ul style="list-style-type: none">• The Council is now using different mechanisms well to promote the corporate safeguarding agenda.• These mechanisms include a robust Corporate Safeguarding Board, reports going to different member forums (Governance and Audit Committee, Health and Care Scrutiny Committee and Cabinet) and considering how Internal Audit can contribute to the strengthening of the Council's corporate safeguarding arrangements. For example, in 2023 Internal Audit completed a review of Disclosure and Barring Service (DBS) checks.• The annual self-assessment audit process for service areas provides an additional cross-Council assurance mechanism.

⁴ See Appendix 2 for further explanation of progress categories.

Recommendation	Judgement of progress
<p>R2 The Council should agree and implement a corporate safeguarding policy and ensure it is easily accessible and understandable to staff, members and other stakeholders, and that it is reviewed periodically to ensure it is kept up to date and embedded in the day-to-day workings of every service in the Council.</p>	<p>Implemented</p> <ul style="list-style-type: none"> • The Council approved its Corporate Safeguarding Policy in December 2022. There is a commitment to review the policy in 2025. • The Corporate Safeguarding Policy is published on the Council website and the Council intranet, so it is easily accessible to stakeholders. • The Corporate Safeguarding Policy is clear in its messaging and there is also a one-page summary of the policy available on the Council website which further aids the accessibility and understanding of the message. • The Corporate Safeguarding Policy features an annual self-assessment audit tool for service areas. This mechanism helps embed safeguarding in the day-to-day working of every service in the Council.
<p>R3 The Council needs to urgently ensure that the Corporate Safeguarding Group is carrying out its responsibilities in accordance with the Group’s own Terms of Reference ‘to ensure that all members and staff fulfil their roles and responsibilities in helping to keep people safe from harm and abuse, acknowledging that safeguarding is everybody’s business in every service within the Council’.</p>	<p>Implemented</p> <ul style="list-style-type: none"> • The Corporate Safeguarding Board, as it is now called, now operates more effectively and in accordance with its own Terms of Reference. • The Corporate Safeguarding Board is central to the improvement that is evident in promoting corporate safeguarding awareness throughout the Council.

Recommendation	Judgement of progress
<p>R4 The Council needs to publicise the roles and responsibilities of the lead officer and lead member for corporate safeguarding to strengthen corporate leadership and accountability.</p>	<p>Implemented</p> <ul style="list-style-type: none"> • The Council has taken steps to widely publicise the roles of lead member and lead officer for corporate safeguarding. For example, this information is on the Council website and in the Corporate Safeguarding Policy. • The staff and members we interviewed perceived there to be much higher awareness of the lead roles than at the time of our last report. • The Council understands that promoting awareness needs to be a continuous process and not a one-off event and the Council has appropriate arrangements to do so.
<p>R5 The Council should review the need for having two Disclosure and Barring Service policies. If it decides to keep the two policies, it should be clear as to the rationale why, and clear on the following matters, to avoid confusion:</p> <ul style="list-style-type: none"> • who the policies apply to; • ensure they are reviewed at the same time; • are consistent with each other; and • that anyone using the policies is sighted that they are both current and up to date. 	<p>Implemented</p> <ul style="list-style-type: none"> • The Council now has a single Disclosure and Barring Service (DBS) policy in place, removing the potential for confusion that there was previously.

Recommendation	Judgement of progress
<p>R6 The Council should produce central guidance on the recruitment of volunteers to help to ensure consistency across the Council.</p>	<p>Work in progress</p> <ul style="list-style-type: none"> • The Council has produced a Volunteering for the Council policy that is applicable to all areas of the Council, except schools. • Schools are asked to adopt the model Volunteering in Schools policy, and the Council has oversight arrangements to ensure that schools are using that policy. • The Council has confirmed that regular volunteers are required to undertake the corporate mandatory safeguarding training, but the Volunteering for the Council policy is not clear on this. • The Council has confirmed that it intends to update the Volunteering in Schools policy to make corporate safeguarding training a compulsory part of the induction for regular volunteers. Currently, this training is not compulsory. <p>Area for future focus</p> <ul style="list-style-type: none"> • Is the Council assured that the Volunteering for the Council policy is being implemented effectively? • Is the Council assured that the Volunteering for the Council policy and the Volunteering in Schools policy are clear that completion of the corporate safeguarding training is mandatory?

Recommendation	Judgement of progress
<p>R7 The Council should gather contractual monitoring information from across all Council Directorates to ensure they are all robustly monitoring and quickly addressing safeguarding-related actions.</p>	<p>Work in progress</p> <ul style="list-style-type: none"> • There are several actions in progress that have the potential to strengthen the Council's arrangements and corporate oversight. These include: <ul style="list-style-type: none"> – A new contract management framework is due to be rolled out which categorises contracts on value, risk (including safeguarding) and it provides a standard approach to how the Council manages contracts. So, if there is a platinum contract, there is a higher level of scrutiny. If it is a bronze contract e.g. a stationery contract, then it is lighter touch monitoring. – A new strategic contract management officer started work with the Council in Summer 2024 and they will be responsible for rolling out the new contract management framework and for identifying further training programmes for those contracts below the £1m per annum threshold (there is other training planned for contracts over the £1m per annum threshold). – The Council are currently exploring procuring a new contract management system which would have all information on contracts in one place instead of held within different departments. This would provide greater corporate visibility. – The Council are piloting a contract management survey. The survey has been sent to suppliers in the social care department and includes questions about their safeguarding practices and mechanisms. The Council's aim is to learn from the pilot and implement a wider survey approach. This would form one of the mechanisms of the contract management framework. – The Corporate Safeguarding Board is due to receive a further update on this matter in Autumn 2024. <p>Area for future focus</p> <ul style="list-style-type: none"> • Is the Council assured that its new contract management framework and system is delivering the intended insight and oversight?

Recommendation	Judgement of progress
<p>R8 The Council should accelerate the rate of compliance with the completion of mandatory safeguarding training for staff and members so that ‘all members and staff fulfil their roles and responsibilities in helping to keep people safe from harm and abuse’.</p>	<p>Work in progress</p> <ul style="list-style-type: none"> • The Council has made good progress in addressing most aspects of this recommendation. • It has high rates of compliance with mandatory safeguarding training (92.2% for staff, 100% for members) and Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) training for both staff and members (93.5% overall (excluding schools’ staff) and members at 97% compliance). • Schools’ staff VAWDASV training compliance is 61% so there is room for improvement in this area. • The Council does not currently have overall rates of compliance with schools’ staff compliance with mandatory safeguarding training. However, the Council plans to have a system in place by Autumn half-term to enable it to do this • We have identified a wider issue in respect of corporate safeguarding training. Currently, there isn’t corporate oversight of volunteers safeguarding training. The oversight is done within service areas. From the one spreadsheet we’ve received as an example as part of this review, there are compliance gaps in terms of volunteers completing mandatory corporate safeguarding training. <p>Areas for future focus</p> <ul style="list-style-type: none"> • Is the Council assured that it has effective corporate oversight of mandatory safeguarding training for volunteers? • Is the Council assured that the rate of schools’ staff compliance with VAWDASV training is improving? • Is the Council assured regarding schools’ staff compliance with mandatory corporate safeguarding training?

Recommendation	Judgement of progress
<p>R9 The Council needs to clarify its expectations of contractors in respect of safeguarding training because there are currently discrepancies in the Council's approach.</p>	<p>Work in progress</p> <ul style="list-style-type: none"> • The Council has taken steps to clarify these expectations and to remove the previous discrepancies in approach. • The Procurement and Contracts webpage on the Council website has been updated to include details on Safeguarding Training expectations for suppliers. The Instructions to Tenderers document links to this webpage. • However, the Council has not updated the Contractors Guidance for Safer Recruitment. Our 2022 report found that 'The Contractors Guidance for Safer Recruitment could be stronger on mandating safeguarding training. It currently just recommends (as opposed to mandates) 'that all employees that come into contact with children, young people and/or adults at risk receive children and/or adult safeguarding awareness training'. <p>Area for future focus</p> <ul style="list-style-type: none"> • Is the Council assured that its Contractors Guidance for Safer Recruitment has been updated and is consistent with other Council policies in its requirements for contractors to do safeguarding training?
<p>R10 The Council should improve the quality of corporate safeguarding performance information that goes to Cabinet and scrutiny to facilitate improved oversight of corporate safeguarding.</p>	<p>Implemented</p> <ul style="list-style-type: none"> • There has been significant improvement in this area, with regular Corporate Safeguarding Board Activity Reports going to GAC, Health and Care Scrutiny and Cabinet. There has been good engagement from members and value added in challenge and suggestions from members. • The quality of corporate safeguarding information going to members has improved from what it was at the time of our 2022 report.

Recommendation	Judgement of progress
<p>R11 The Council should assure itself that all directorates are fully considering safeguarding risks, have suitable escalation and mitigation processes where necessary, and, where appropriate, ensure directorate risk registers reflect that consideration.</p>	<p>Implemented</p> <ul style="list-style-type: none"> • The Strategic Risk Register includes risks that relate to safeguarding. • Safeguarding features on several service area risk registers. • All services complete annual safeguarding self-assessments which potentially helps those services with the assessment of corporate safeguarding risks in their areas. • Overall, there are appropriate escalation and mitigation processes, although one minor weakness identified was that two of the safeguarding risks in the Homelessness service risk register had no controls or actions (i.e. mitigations) recorded against them.

Appendix 2

Audit criteria and judgement framework

Audit criteria

The Council has put in place appropriate measures of success to understand the impacts of addressing the recommendations.

The Council has acted in line with its own intended timescales. Where it has not, it has communicated the delays to senior leaders and elected members.

The Council can evidence what has changed because of addressing the recommendations.

The Council has arrangements to challenge its own assessment of progress in addressing the recommendations.

The Council provides periodic updates to elected members on progress against its actions to address the recommendations.

Source: Audit Wales

Judgement framework

Recommendation Status	Explanation
Not accepted	The audited body did not accept our original recommendation. This is recorded in the Management Response Form.
Implemented	The audited body has implemented the recommendation actions, and the recommendation is deemed closed.
Work in progress	The audited body has started work (including planning) to implement the recommendation.
Work not yet started	The audited body has not yet started work to implement the recommendation.
No longer relevant	Other events or circumstances, for example legislative changes or significant changes in the operating environment have overtaken recommendations and they are no longer relevant. Alternatively, the audited body has found another way to implement change which renders the original recommendation obsolete. Also, if a subsequent Audit Wales audit report has made different or overriding recommendations.

Source: Audit Wales



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