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Follow-up review of corporate arrangements for the safeguarding of children – **City and County of Swansea**

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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 August and September 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 addressed most of the recommendations in our previous national and local safeguarding reports but should strengthen some aspects of its 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	The Council should review its Disclosure and Barring Service (DBS) Policy to remove obsolete references and ensure it is up to date.
P2	The Council should strengthen its Recruitment and Selection Policy in the following ways: <ul style="list-style-type: none">• refer to safeguarding as a key commitment in the opening section of the policy;• specify that job adverts for posts that require a DBS check will contain an explicit statement on safeguarding; and• cross-refer to the Corporate Safeguarding Policy and the DBS Policy.

¹ Auditor General for Wales, Local Authority Arrangements to Support Safeguarding of Children – Swansea Council, September 2014

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

Proposals for improvement

P3	The Council should develop a central system for recording and monitoring volunteer information, including any training records and DBS checks for volunteers, and consider producing central guidance for the recruitment of volunteers.
P4	The Council should consider whether its tender documentation could be strengthened with regard to safeguarding.
P5	The Council should ensure appropriate monitoring of safeguarding contractual provisions across all Directorates.
P6	The Council should consider producing corporate performance measures in respect of DBS check compliance and better performance measures in respect of corporate safeguarding training.
P7	The Council should take steps to ensure that the mandatory completion of Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training is on track for schools staff.
P8	The Council needs to improve its monitoring of safeguarding training compliance.
P9	The Council needs to accelerate the rate of compliance with the completion of its mandatory safeguarding training.

Detailed report

Assessment of progress against the recommendations from our 2015 report

The Council has addressed most of the recommendations in our previous national and local safeguarding reports but should strengthen some aspects of its corporate safeguarding arrangements

Exhibit 2: recommendations from our 2015 report and our assessment of progress against them

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
R1 Improve corporate leadership and comply with the Welsh Government policy on safeguarding through:	
<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; 	Met: <ul style="list-style-type: none"> The Director of Social Services fulfils this role.
<ul style="list-style-type: none"> the appointment of a lead member for safeguarding; and 	Met: <ul style="list-style-type: none"> The Cabinet Member for Health and Wellbeing fulfils this role.
<ul style="list-style-type: none"> regularly disseminating and updating information on these appointments to all staff and stakeholders. 	Met: <ul style="list-style-type: none"> The Council's intranet has a safeguarding page with a prominent statement on safeguarding from the Cabinet Member for Health and Wellbeing. There were intranet statements from the Director of Social Services and the Cabinet Member for Health and Wellbeing, as well as videos from both, promoting national safeguarding week in 2018. The Council's safeguarding intranet page links to the Corporate Safeguarding Policy which is clear on respective roles.

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<ul style="list-style-type: none"> • The web page for the Cabinet Member for Health and Wellbeing sets out that safeguarding is one of his portfolio responsibilities. • The Director of Social Services and the Cabinet Member for Health and Wellbeing jointly chair the Corporate Safeguarding Group. That group includes a lead representative from all service areas across the Council. • Despite efforts to raise the profile of the lead officer and member for safeguarding, the 2018 staff survey returned a low response rate (40%) of staff who knew who the lead member for safeguarding is. The Council recognise that further work is needed to improve awareness and are planning actions to address this such as regular updates via the intranet and events during the forthcoming national safeguarding week. It is positive that the Council are at least asking such questions as part of the staff survey and thereby exploring any potential areas of weakness.
<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:</p> <ul style="list-style-type: none"> • There is a comprehensive Corporate Safeguarding Policy that meets this recommendation. • Safeguarding people from harm is one of the Council's priorities in its Corporate Plan. The Council has placed a strong emphasis on creating a culture in which 'safeguarding is everyone's business'. • The Council has a well-established Corporate Safeguarding Group that oversees implementation of the Corporate Safeguarding Policy. The terms of reference for this Group sets out that it 'aims to ensure that all Council service areas are operating effectively within this policy with robust safeguarding arrangements in place'. • The Corporate Safeguarding Group meets quarterly and has a number of task groups sitting under it that deliver a wide-ranging work programme comprising Safe Employment, Safe Workforce, Safe Practice, Safe Partnerships, Safe Voice and Safeguarding Performance. • The Corporate Safeguarding Policy helpfully sets out the corporate safeguarding governance structure and how it works.

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<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 recruitment policies cover all services that come into contact with children; 	<p>Met, with proposals for improvement identified:</p> <ul style="list-style-type: none"> • The Council has a Disclosure and Barring Service (DBS) policy that applies to all staff and volunteers. However, it was last reviewed in April 2014 and contains some obsolete references. For example, it refers to the CRB (Criminal Records Bureau) and the Independent Safeguarding Authority, but those organisations merged to form the Disclosure and Barring Service. The policy also refers to the Data Protection Act 1998 which has now been repealed. • The Council has a Recruitment and Selection Policy that applies to all staff. However, there is scope to strengthen this policy as set out in P2 above. • Volunteers are recruited by Directorates and the Council does not have central guidance for the recruitment of volunteers and should consider producing such guidance in order to provide consistency of approach and increased corporate oversight. • The Council has a template job description with a safeguarding commitment in it - 'The Authority is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment'.
<ul style="list-style-type: none"> • creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and 	<p>Mainly met:</p> <ul style="list-style-type: none"> • The Council has a system (Oracle) that holds DBS check information in relation to staff, including schools staff. Renewal reports can be run off the Oracle system. The Oracle system does not hold volunteers' DBS check information, that is held on Ebulk via a link up the Council has with Powys County Council. Volunteers are recruited by Directorates and the Council would benefit from developing a central system for recording and monitoring volunteers DBS check information.

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<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 proposals for improvement identified:</p> <ul style="list-style-type: none"> The Council has stated that safeguarding clauses are placed in all social care contracts and inserted into other contracts where there are relevant. The Council has a safeguarding policy specifically for contractors. The Council has provided examples of safeguarding contractual clauses that are fit for purpose. The Council has a supplier suitability questionnaire that appropriately asks safeguarding related questions. There is scope for the Council to strengthen its tender documentation in relation to safeguarding. There is a section called 'Safeguarding Code of Conduct' that is written from the angle of contractors not placing themselves in vulnerable situations, but it doesn't refer to DBS checks or safeguarding training. The Council may wish to consider adding additional safeguarding information to their tender documentation, such as in respect of modern day slavery. The Council considers that its contract monitoring of safeguarding provisions in contracts is strong within social care, but there was recognition that there is scope to ensure all Directorates apply the same rigour where appropriate. The Council has recently identified a potential weakness in respect of safeguarding procedures for 'one off' events commissioned via ward funding. However, it has set up a corporate working group to look at that with a view to tightening up procedures.
<p>R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p>	
<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:</p> <ul style="list-style-type: none"> Safeguarding training is mandatory for all staff and the Council has recently stipulated that it must be completed within one month of employees' start dates. Safeguarding is signposted as part of the corporate induction. The latest figure provided by the

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>Council was that 71% of staff have completed the mandatory safeguarding training to date.</p> <ul style="list-style-type: none"> • The mandatory training is available via e-learning and face to face training and there is a requirement for it to be refreshed after three years. • The Education Department provides level 1 training to all maintained schools in Swansea which is consistent with the mandatory e-learning training required by all local authority staff. There is a requirement that schools ensure all staff access this training every three years. • In the latest return provided by the Council to the Welsh Government, 87% of non-schools staff have completed the mandatory VAWDASV training. However, the Council has no mechanism to oversee compliance in respect of completing this training for schools staff and the Education Department has identified this as an area for improvement. • The draft 2018-19 annual corporate safeguarding report sets out that in 2018-19 the percentage of elected members who have completed safeguarding training is 81.9%. The Council has provided us with a spreadsheet that sets out that 100% of Councillors had some form of both adults and children's safeguarding training. • The Council has proactively targeted providing taxi drivers with safeguarding training.
<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 it has a significant weakness in its ability to monitor compliance with training, including safeguarding training. The Council is looking to develop the Oracle system to improve its ability to do this. Pulling together compliance information is an onerous process currently. • There isn't a corporate-wide system to track compliance with safeguarding training apart from the e-learning system. Separate records are held for schools staff, elected members and governors. • Volunteers' training information is held by individual Directorates and the Council would benefit from developing a central record of that information.

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<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:</p> <ul style="list-style-type: none"> The Council provided us with contractual examples that specify the requirements for safeguarding training.
<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; and the performance of contractors and commissioned services on compliance with council safeguarding responsibilities. 	<p>Mainly met, with a proposal for improvement identified:</p> <ul style="list-style-type: none"> The annual corporate performance management report 2018-19 has a strong focus on safeguarding, although the performance indicator for staff training is unhelpful because the indicator of 'Total number of staff who have completed the corporate mandatory safeguarding awareness training' had a target of 700 staff in 2018-19 and a target of 1,000 staff for 2017-18. This does not shed any light on the position for all staff in the organisation, given there are between 8,000 and 9,000 staff. In addition, the Council is not meeting its own target and the measure is red RAG rated. The Council has produced an annual corporate safeguarding report for several years. It contains a good level of information about corporate safeguarding developments. It also contains some performance measures drawn from the annual corporate performance management report. The Council does not have any corporate performance measures in respect of DBS check compliance. The letter from Care Inspectorate Wales (CIW) to the Director of Social Services providing feedback on progress following CIW's annual performance review in May 2019 was reported to both the Adults and Children's Scrutiny Performance Panels. As the Council has moved to outsource its Leisure service, it's important that this and other commissioned services perform in accordance with their safeguarding obligations and the Council needs to ensure this is monitored and consider the merits of reporting on such performance.

³ The 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
<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>Mainly met:</p> <ul style="list-style-type: none"> • Since our 2015 report Internal Audit has carried out a review of progress made by the Council in implementing the Corporate Safeguarding Policy. Internal Audit also carried out a review of progress made in respect of the proposals for improvement set out in our local safeguarding report issued to the Council in September 2014. • Internal Audit's 2019-20 audit plan includes a review that will check compliance with the Corporate Safeguarding Policy. This safeguarding review has been added to Internal Audit's rolling programme of audits and will be undertaken every two or three years. • Internal Audit may wish to consider incorporating reviews of other aspects of the Council's corporate safeguarding arrangements into their future work programme, for example a review on safe recruitment.
<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>Met:</p> <ul style="list-style-type: none"> • Safeguarding is on the Corporate Risk Register and there is a monthly review of corporate risks by the Corporate Management Team and Cabinet. • Service plans for all service areas need to demonstrate links to corporate priorities, including safeguarding people from harm, and service plans include consideration of risks. • The Council has recently introduced a corporate safeguarding self-assessment programme for all Directorates. There are also section 135 (of the Social Services and Well-being (Wales) Act 2014) audits that leads from each department complete alongside safeguarding officers and both these mechanisms should help with the consideration of safeguarding risks within each service area.

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

Exhibit 3: proposals for improvement from our local 2014 report and our assessment of progress against them

Proposals for improvement in our 2014 local report issued to the Council in September 2014	Wales Audit Office assessment of Council's progress
<p>P1 Provide all elected members are made aware of the concept and use of risk management and its central importance in safeguarding</p>	<p>Met:</p> <ul style="list-style-type: none"> • The Council's Risk Management Policy states that 'Cabinet Members have joint-ownership / ownership for Corporate, Directorate and Service Risks where they can help control the risk' and 'All Members are responsible for considering the current and long-term risks associated with policy decisions'. • The Council's Corporate Risk Management Framework states as one of its aims 'ensure that risk management is embedded into the culture of the Council, with employees, Members and managers at all levels recognising that risk management is part of their jobs'. Roles and responsibilities of members are: <ul style="list-style-type: none"> – gain an understanding of risk management and its benefits; – be aware of how risks are being managed through the Risk Management Policy and Framework; and – maintain an awareness of the risk management implications of policy decisions. • Safeguarding is on the Corporate Risk Register and there is a monthly review of Corporate Risks by the Corporate Management Team and Cabinet. • Safeguarding people from harm is one of the Council's well-being objectives. • Awareness of safeguarding is high amongst members with all members have had some form of children and adults safeguarding training.

Proposals for improvement in our 2014 local report issued to the Council in September 2014	Wales Audit Office assessment of Council's progress
<p>P2 Improve the range, quality and coverage of safeguarding performance reporting to provide adequate assurance that systems are working effectively</p>	<p>Mainly met:</p> <ul style="list-style-type: none"> The Council should consider producing corporate performance measures in respect of DBS check compliance and better performance measures in respect of corporate safeguarding training. However, strengths include the number of performance measures in respect of safeguarding that are reported in the annual corporate performance report, and also interviewees' whom we spoke to were confident that the detail and regularity of performance information that is reported to the Children and Adults Scrutiny Performance Panel was sufficient for them to scrutinise matters properly.
<p>P3 Improve the work of the Council's Scrutiny Committees to ensure it is providing assurance on the effectiveness of the Council's corporate safeguarding arrangements</p>	<p>Met:</p> <ul style="list-style-type: none"> The annual corporate safeguarding report goes to the Scrutiny Programme Committee. The Child and Family Services Scrutiny Performance Panel has considered the topic of Child Sexual Exploitation and their 2019-20 work programme includes work on Safeguarding (County Lines and Child Sexual Exploitation). A consistent view was expressed by interviewees that scrutiny are effectively scrutinising safeguarding matters.
<p>P4 Ensure all elected members and staff who encounter children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding</p>	<p>Met for members, mainly met for staff:</p> <ul style="list-style-type: none"> As set out against recommendation 4 above, the draft 2018-19 annual corporate safeguarding report sets out that in 2018-19 the percentage of elected members who have completed safeguarding training is 81.9%. The Council has provided us with a spreadsheet that sets out that 100% of Councillors had some form of both adults and children's safeguarding training. The latest figure provided by the Council was that 71% of staff have completed the mandatory safeguarding training to date.

Proposals for improvement in our 2014 local report issued to the Council in September 2014	Wales Audit Office assessment of Council's progress
	<ul style="list-style-type: none"> In the latest return provided by the Council to the Welsh Government, 87% of non-schools staff have completed the mandatory VAWDASV training. However, the Council has no mechanism to oversee compliance in respect of completing this training for schools staff and the Education Department has identified this as an area for improvement.
P5 Identify and agree an appropriate internal audit programme of work for safeguarding	<p>Mainly met:</p> <ul style="list-style-type: none"> See narrative against recommendation 7 above.

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