

Follow-up Review of Corporate Arrangements for Safeguarding – Pembrokeshire County Council

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Mae'r ddogfen hon hefyd ar gael yn Gymraeg. This document is also available in Welsh.

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Summary report

The Council has made some progress in addressing our previous proposals for improvement but still needs to strengthen its oversight and assurance arrangements for corporate safeguarding

What we reviewed and why

- 1 In May 2019 we published a report entitled Review of Corporate Arrangements for Safeguarding – Pembrokeshire County Council. That report included ten proposals for improvement.
- 2 In this review we have focused on the progress made by the Council against the proposals for improvement issued.
- 3 We undertook this review between July and September 2021.

Proposals for improvement

What we found

- 4 A summary of our findings is included at **Exhibit 2**. Overall, we found that **the Council has made some progress in addressing our previous proposals for improvement but still needs to strengthen its oversight and assurance arrangements for corporate safeguarding**. We have issued further proposals for improvement in this report.

Exhibit 1: further proposals for improvement issued

In addition to the ten proposals for improvement we made in our original report (May 2019), some of which are yet to be fully addressed by the Council (**see Exhibit 2**), the table below sets out four further proposals for improvement that we have identified following this review.

Further proposals for improvement

Fully addressing all previously issued proposals for improvement

- P1 The Council needs to take action to ensure that it complies with the proposals for improvement 3, 4, 9 and 10 issued in our May 2019 report on corporate arrangements for safeguarding.
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Corporate Safeguarding Policy

- P2 The Council needs to assure itself that it is complying with its own Corporate Safeguarding Policy.
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Recruitment

- P3 When recruiting to all vacancies, the Council should formally record and retain, on the corporate system, the risk assessment undertaken when determining whether a role requires a DBS check (and at what level).
- P4 When recruiting volunteers, the Council should formally record and retain, on the corporate system, the risk assessment undertaken when determining whether a volunteer role requires a DBS check (and at what level).

Detailed report

Assessment of the Council’s progress against the proposals for improvement issued in our report ‘Review of Corporate Arrangements for Safeguarding – Pembrokeshire County Council’ (May 2019)

Exhibit 2: proposals for improvement from our May 2019 report, our assessment of the Council’s progress against them, and further actions identified as needed

Proposals for improvement (PFIs) from Audit Wales’ report Review of Corporate Arrangements for Safeguarding (May 2019)	Audit Wales’ assessment of the Council’s progress against the PFIs (as at September 2021)	Opportunities for the Council to consider	Further proposals for improvement issued
<p>PFI 1 The Council needs to clarify in its Safeguarding Policy</p>	<p>PFI met but wider issues identified</p> <ul style="list-style-type: none"> The Council has clarified in its Corporate Safeguarding Policy (issued date November 2018)¹ that, ‘The Council’s Democratic process 		<p>The Council needs to assure itself that it is complying with its own Corporate Safeguarding Policy.</p>

¹ At the start of this review we were provided with an earlier version of the Corporate Safeguarding Policy, which was the same as the version in place when we carried out our original work in 2019. We have identified a version control issue because both that version, and the latest version of the policy, have the same date of issue and version number.

Proposals for improvement (PFIs) from Audit Wales' report Review of Corporate Arrangements for Safeguarding (May 2019)	Audit Wales' assessment of the Council's progress against the PFIs (as at September 2021)	Opportunities for the Council to consider	Further proposals for improvement issued
the scrutiny arrangements for safeguarding.	<p>for challenge is its Scrutiny function. The Corporate Overview & Scrutiny Committee will receive an annual report in respect of compliance with the overall corporate safeguarding policy. The Schools and Learning Overview & Scrutiny Committee will also have sight of the Children's and Schools annual SAFE audit.'</p> <ul style="list-style-type: none"> • The corporate safeguarding policy also states that, 'The Whole Authority Safeguarding Group will produce a report at least annually for Senior Leadership Team, Cabinet and Scrutiny. This report will provide an overview of the Council's safeguarding performance. This will provide an opportunity for councillors to scrutinise and challenge the work of the Whole Authority Safeguarding Group'. To date, the Whole Authority Safeguarding Group (WASG) has not produced such an annual report, although the Council has told us that it intends to take a report to the Corporate Overview & Scrutiny Committee in November 2021. • Corporate safeguarding has not featured on the agenda of any meeting of the Corporate Overview and Scrutiny Committee (since our report was published in May 2019). However, we note that the Corporate Safeguarding Policy sets out that, 'The role of the Corporate Overview and Scrutiny Committee is to review and scrutinise decisions 		

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	<p>and make reports or recommendations in connection with the discharge of any of the Council's functions whether by the Cabinet or another part of the Council. The role is to provide constructive challenge to the Council about its safeguarding activity in an impartial and independent manner'.</p> <ul style="list-style-type: none"> The Council's Corporate Safeguarding Policy was due for review in November 2020, but this has not been done. 		
<p>PFI 2 The Council should clarify the roles and responsibilities of the Lead Member and the Member Champion for Safeguarding in the policy and communicate this.</p>	<p>PFI met</p> <ul style="list-style-type: none"> The current version of the Corporate Safeguarding Policy sets out the roles and responsibilities of the Lead Member and the Member Champion for Safeguarding. 	<p>The Council should evaluate if the roles and responsibilities of the Lead Member and the Member Champion for Safeguarding are effectively meeting its needs, and if the roles are sufficiently communicated.</p>	

Proposals for improvement (PFIs) from Audit Wales' report Review of Corporate Arrangements for Safeguarding (May 2019)	Audit Wales' assessment of the Council's progress against the PFIs (as at September 2021)	Opportunities for the Council to consider	Further proposals for improvement issued
<p>PFI 3</p> <p>The Council needs to publicise the new corporate safeguarding policy to ensure staff, councillors and wider stakeholders are aware of it and how it should be applied.</p>	<p>PFI partially met</p> <ul style="list-style-type: none"> • There is scope for the Council to improve the arrangements for publicising the Corporate Safeguarding Policy. The version of the Corporate Safeguarding Policy on the Council's website is not the current version. • The latest version of the Corporate Safeguarding Policy is on the Council's internal intranet. • The Action Plan produced by the Council (in response our May 2019 report), states in relation to this PFI that, 'Information to be combined with new cards or .vcf² cards agreed at WASG'. However, the cards do not refer to the Corporate Safeguarding Policy. Also, the proposal for improvement references publicising the Corporate Safeguarding Policy to wider stakeholders and councillors. These cards were for staff only. 	<p>The information on the Council's public website and on its internal intranet system in relation to safeguarding could be improved by ensuring that all relevant information on safeguarding, including all relevant policies and procedures are available in one place (currently information is available on the internet and intranet but is held disparately).</p>	<p>Original PFI not fully met. The Council needs to take action to ensure that it meets this PFI.</p>

² This stands for 'virtual contact file' which enables users to add it as a contact on a mobile phone.

Proposals for improvement (PFIs) from Audit Wales' report Review of Corporate Arrangements for Safeguarding (May 2019)	Audit Wales' assessment of the Council's progress against the PFIs (as at September 2021)	Opportunities for the Council to consider	Further proposals for improvement issued
<p>PFI 4</p> <p>The Council should ensure that safeguarding risks are appropriately considered as part of the move to directorate-based risk registers.</p>	<p>PFI partially met</p> <ul style="list-style-type: none"> Safeguarding features on the Council's corporate risk register, and it features on the Social Services and the Education Directorate risk registers. It does not appear on any other directorate risk registers and there is no evidence that the Council has considered whether it should. The Council needs to assure itself that safeguarding risks are being appropriately considered by all directorates. 	<p>The Council should assure itself that all directorates are fully considering safeguarding risks and, where appropriate, ensuring directorate risk registers reflect that consideration.</p>	<p>Original PFI not fully met. The Council needs to take action to ensure that it meets this PFI.</p>
<p>PFI 5</p> <p>The Council should formally record and retain, on the corporate HR system, the risk assessment undertaken when determining whether a role requires a DBS check (and at what level).</p>	<p>PFI partially met and wider issues identified</p> <ul style="list-style-type: none"> The Council has interpreted this proposal for improvement as relating to 'new' posts. Since 1 October 2020, the Council has conducted a risk assessment for 'new' posts and retains this record on a corporate system. We think this narrow interpretation of the proposal for improvement is a missed opportunity as the Council does not follow this process for all vacancies that arise. Under this approach, no existing job role will ever have a formal risk assessment undertaken that is recorded and retained on the corporate HR system. 		<p>When recruiting to all vacancies the Council should formally record and retain, on the corporate system, the risk assessment undertaken when determining whether a role requires a DBS check (and at what level).</p>

Proposals for improvement (PFIs) from Audit Wales' report Review of Corporate Arrangements for Safeguarding (May 2019)	Audit Wales' assessment of the Council's progress against the PFIs (as at September 2021)	Opportunities for the Council to consider	Further proposals for improvement issued
<p>PFI 6</p> <p>The Council should keep all volunteer records on the corporate HR system to ensure that it has a single central recruitment record</p>	<p>PFI met but wider issues identified</p> <ul style="list-style-type: none"> • The Council now records all volunteer records on the corporate HR system. • The Council is not formally recording and retaining, on the corporate HR system, the risk assessment undertaken when determining whether a volunteer role requires a DBS check (and at what level). 		<p>When recruiting volunteers, the Council should formally record and retain, on the corporate system, the risk assessment undertaken when determining whether a volunteer role requires a DBS check (and at what level).</p>
<p>PFI 7</p> <p>The Council should evaluate whether producing a corporate volunteering policy would strengthen its governance arrangements for safeguarding.</p>	<p>PFI met</p> <ul style="list-style-type: none"> • The Council has produced a corporate Volunteer Policy (dated January 2020). 	<p>The Council should consider how it is ensuring that its managers are aware of and adhering to the Volunteer Policy.</p>	

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<p>PFI 8</p> <p>The Council should establish a robust system so that it can be certain that everyone who should have completed safeguarding training has received it.</p>	<p>PFI met</p> <ul style="list-style-type: none"> The Council now has a system to effectively record which staff have had mandatory safeguarding training and those that have not. The Whole Authority Safeguarding Group monitors compliance. 	<p>The Council should consider whether corporate oversight is required of other levels of safeguarding training required by staff and whether they have received it.</p>	
<p>PFI 9</p> <p>The Council should review procurement practices to ensure that safeguarding matters are fully considered and managed when services are delivered on the Council's behalf by third parties.</p>	<p>PFI not met</p> <ul style="list-style-type: none"> No evidence was provided by the Council to show that it had reviewed its procurement practices to ensure that safeguarding matters are fully considered and managed when services are delivered on the Council's behalf by third parties. 		<p>Original PFI not met. The Council needs to take action to ensure that it meets this PFI.</p>

Proposals for improvement (PFIs) from Audit Wales' report Review of Corporate Arrangements for Safeguarding (May 2019)	Audit Wales' assessment of the Council's progress against the PFIs (as at September 2021)	Opportunities for the Council to consider	Further proposals for improvement issued
<p>PFI 10</p> <p>The Council should determine whether Council specific performance measures would assist scrutiny in its role and provide greater assurance on the effectiveness of the Council's new safeguarding policy.</p>	<p>PFI not met</p> <ul style="list-style-type: none"> • The Council has not developed performance measures to assist scrutiny in its role to provide greater assurance on the effectiveness of the Council's corporate arrangements for safeguarding. The Corporate Overview and Scrutiny Committee, which under the Council's constitution has responsibility for corporate safeguarding, has to date not received any report on safeguarding. • The Whole Authority Safeguarding Group has not developed a set of performance measure to provide assurance on the effectiveness of the Council's Safeguarding Policy or its corporate safeguarding arrangements. The only performance measures collected by the Whole Authority Safeguarding Group relate to compliance with mandatory safeguarding training. 		<p>Original PFI not met. The Council needs to take action to ensure that it meets this PFI.</p>



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