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Review of Corporate Arrangements for Safeguarding – **Conwy County Borough Council**

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This document is also available in Welsh.

The team who delivered the work comprised Ian Phillips, Gwilym Bury and Sara-Jane Byrne under the direction of Huw Rees.

Contents

The Council has addressed most of the recommendations in our national safeguarding report but could strengthen some of its arrangements and aspects of performance

Summary report 4

Proposals for improvement 5

Detailed report

The Council has addressed most of the recommendations in our national safeguarding report but could strengthen some of its arrangements and aspects of performance 6

The Council has clear arrangements for overseeing whether it is meeting its safeguarding responsibilities and a strong culture that safeguarding is everybody's responsibility but some arrangements could be stronger 6

The Council could improve its safeguarding training arrangements 7

The Council monitors and evaluates appropriate safeguarding information and has identified some areas of under-performance 9

Appendices

Appendix 1 – The Council has addressed the majority of the recommendations made in our 2015 national report on safeguarding 11

Appendix 2 – The Council has addressed the majority of the recommendations made in our 2015 national report on safeguarding 13

Summary report

Summary

What we reviewed and why

- 1 We reviewed Conwy County Borough Council's (the Council) corporate arrangements for the safeguarding of children and adults. While certain governance arrangements for safeguarding operate regionally (in this geographical area through the North 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 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.
- 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 **The Council has addressed most of the recommendations in our national safeguarding report but could strengthen some of its arrangements and aspects of performance.** We reached this conclusion because:
 - The Council has clear arrangements for overseeing whether it is meeting its safeguarding responsibilities and a strong culture that safeguarding is everybody's responsibility but some arrangements could be stronger
 - The Council could improve its safeguarding training arrangements
 - The Council monitors and evaluates appropriate safeguarding information and has identified some areas of under-performance
 - The Council has addressed the majority of the recommendations made in our 2015 national report on safeguarding

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

² A copy of the report is available on the Wales Audit Office website www.audit.wales

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 needs to assure itself that schools have robust safeguarding arrangements and encourage schools to adopt corporate safeguarding policies, such as the corporate Engaging Volunteers Policy.
P2	<p>The Council should improve its approach to safeguarding training:</p> <ul style="list-style-type: none">• the Council needs to assure itself that all staff have had mandatory safeguarding training and improve the rate of compliance;• the Council should consider amending the performance measure of 'percentage of staff receiving training within 12 months of commencing post' to a shorter timeframe;• the Council should accelerate the rate at which staff can complete the mandatory Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training, particularly in the Education – Non schools service;• the Council should make sure its proposed safeguarding refresher training for elected members takes place;• the Council should make clear how often mandatory safeguarding training for staff needs to be refreshed; and• the Council should clarify if safeguarding training is mandatory for school governors.
P3	The Council should ensure it is able to monitor volunteer information centrally, including any training records and Disclosure and Barring Service checks.
P4	The Council should address the areas of under performance it has identified (see Appendix 2).

Detailed report

The Council has addressed most of the recommendations from our national safeguarding report, but it could strengthen some of its arrangements and aspects of performance

The Council has clear arrangements for overseeing whether it is meeting its safeguarding responsibilities and a strong culture that safeguarding is everybody's responsibility but some arrangements could be stronger

- 6 The Council has developed strong corporate safeguarding governance arrangements. The Council has a Corporate Safeguarding Panel (CSP) involving senior representatives from across the Council. The CSP has been chaired by the Chief Executive since January 2018. This has helped to raise the profile of safeguarding within the Council and to reinforce the message that safeguarding is everybody's responsibility. In addition to the CSP, the Council also has a Designated Safeguarding Leads Forum, comprising all Designated Safeguarding Managers from across the Council, which is an effective mechanism for helping to embed safeguarding across all Directorates within the Council.
- 7 The Council has experienced and capable officers who fully understand their roles in respect of safeguarding. The professional relationships between senior officers responsible for safeguarding and the Cabinet Member for Social Care (Children, Family and Safeguarding) are positive and there are regular discussions about safeguarding matters.
- 8 Safeguarding is included as a risk in the Corporate Risk Register and all Service Level Risk Registers. The CSP Action Plan sets out that all services should annually formally assess their safeguarding risks and take appropriate action to mitigate future risks. A summary of that formal assessment is reported to the CSP.
- 9 The CSP is comprehensive, regularly reviewed and published on the Council's intranet and website. There are also other safeguarding related policies such as the Recruitment Policy, the Engaging Volunteers Policy and Disclosure and Barring Service (DBS) Checks Policy. The Whistleblowing Policy contains a section on safeguarding and has a link to the CSP. There is scope to strengthen the CSP by cross-referencing other relevant corporate policies in relation to safeguarding. Both the Engaging Volunteers Policy and the DBS Checks Policy cite other corporate documents and policies that should be referred to.
- 10 Minutes of the CSP from 2017 refer to a separate Engaging Volunteers Policy in use in Education. The Council does not think that this separate policy is as robust

as the corporate one, and expects schools to have adopted the corporate Engaging Volunteers Policy. However, the Council is unable to force schools to adopt its policy and, currently, is not sure that it has been adopted by all schools and needs to check compliance in respect of that.

- 11 The Council's Recruitment and Selection Policy includes safe recruitment provisions. The Council uses contracts with appropriate safeguarding provisions and safer recruitment training is mandatory for recruiting managers.
- 12 The Council is unable to mandate that schools use the Council's Recruitment and Selection Policy. It is a matter for each Governing Body to determine whether or not they adopt or adapt the model policy provided by Education Services' Human Resources. The Council is currently writing to school governors to establish whether schools have a safe recruitment policy that is regularly reviewed and encompasses the principles of safeguarding.
- 13 The Council is in the process of transferring DBS records held on the separate system that is used by Education into its corporate iTrent system. Once that transfer has taken place, then the Council will have a single system to record and monitor compliance levels on DBS checks for all staff. This will help to address recommendation 3 from our 2015 national report set out in [Appendix 1](#). The Council does not yet have a non-staff area of iTrent and so does not hold DBS check information for volunteers on one central system. A central system (iTrent) is currently being piloted in the Youth Justice Service to ensure the service can record the data required on DBS check information for volunteers. When this is working satisfactorily in the Youth Justice Service, the system will be rolled out to other Council services.
- 14 We recognise that schools have a level of autonomy about adopting councils' policies and procedures, but it is important that the Council is assured that its schools have appropriate arrangements to safeguard children and it needs to continue its efforts in this area.

The Council could improve its safeguarding training arrangements

- 15 Mandatory e-learning safeguarding training had a delayed roll out but has been available since August 2018. As of March 2019, the Council's records state that 48% of staff have completed the mandatory safeguarding training, which includes figures for face-to-face training as well as the e-learning training. The Council has provided several reasons for this figure. These include a technical issue where if an officer does not click to print a certificate at the end of the training then it is not always logged as having been completed. Some staff have had more advanced safeguarding training and so have not done the more basic e-learning training (although it remains mandatory for them to complete). The figures are also based on the number of posts not people, so if one person has three posts and has not completed the training then it shows up on three posts. Despite these reasons, the Council needs to better assure itself that all staff have had mandatory safeguarding training and accelerate the completion rate.

- 16 The Council has a performance measure of 'percentage of staff receiving training within 12 months of commencing post'. This is a lengthy period of time for such an important piece of training, and the Council should consider reducing this timescale, particularly now that the safeguarding e-learning training is available.
- 17 A corporate safeguarding booklet is given out as part of induction and is a helpful overview of safeguarding, things to look out for, and it signposts the policy and relevant contact numbers. However, statistics for completion of induction within appropriate timescales need to improve (see [Appendix 2](#)).
- 18 Training in respect of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) is mandatory, but completion of that training is just under 70% over a year after that training was rolled out. It is a Welsh Government requirement that VAWDASV training is mandatory and the Council needs to ensure 100% compliance is achieved. A particularly poor completion rate of only 31% has been achieved in the 'Education – Non Schools' department.
- 19 The Council's training records confirm that all elected members have had safeguarding training. The Council requires councillors to have safeguarding training once per administration. Some councillors have not had safeguarding training since 2014 and so there is a need for refresher training. The Cabinet Member for Social Care (Children, Family and Safeguarding) recognises this and is planning to ensure that refresher training is provided by the end of the year. The Council could also be clearer as to its expectations for when staff should attend refresher training for safeguarding.
- 20 Safeguarding training information is recorded and monitored through iTrent for Council staff and elected members. The Council is piloting the development of a volunteers area of iTrent that could then capture safeguarding training information about volunteers. The Engaging Volunteers Policy states that volunteer supervisors are responsible for ensuring volunteers receive appropriate basic safeguarding training.
- 21 Training information in respect of schools' staff and governors does not form part of the iTrent training information. Schools do not have the facility to input data directly into iTrent. It is the responsibility of Headteachers or the Designated Safeguarding Person in schools to keep a record of all staff who complete training and on what date and they should be able to provide a list to the Council on request. The Council can compile training records if necessary via Hwb (which is the system schools use to access training). There are ongoing discussions with schools about transferring training records for school staff to iTrent.
- 22 The Council's CSP states that safeguarding training for school governors is mandatory. However, during our interviews with the Council, we were informed that safeguarding training is not mandatory for school governors. The Council needs to clarify this contradiction. The Council have stated that the training of school governors is schools' responsibility. Education Services hold a spreadsheet which logs governors who have attended enhanced safeguarding training. The Council's schools management review (a survey which asks schools questions on safeguarding matters) includes questions on how effective schools consider themselves at ensuring mandatory safeguarding training is completed. The Council

considers the responses from schools and has said they will challenge any gaps. However, only 36 out of 62 schools responded to the survey, so the Council does not have full oversight in this respect.

- 23 The Council has contractual provisions that stipulate that it is the responsibility of the organisation providing the staff to ensure they receive safeguarding training. This is monitored by the contract monitoring team.

The Council monitors and evaluates appropriate safeguarding information and has identified some areas of under-performance

- 24 The Council has developed a series of corporate safeguarding performance measures which are reported to, and monitored by, the CSP.
- 25 Safeguarding is a corporate priority of the Council and is mentioned a number of times in the 2017-18 annual performance report. The Council also has a mid-year corporate performance report that includes safeguarding performance measures that is reported to Cabinet and the Finance and Resources Scrutiny Committee.
- 26 The Social Care and Health Scrutiny Committee receives annual safeguarding reports from the CSP and the Safeguarding Unit. The annual safeguarding report from the CSP does not contain performance measure information. Interviewees expressed a general view that scrutiny members are effectively scrutinising safeguarding matters.
- 27 As mentioned in [paragraph 8](#) above, the Corporate Risk Register and Service Risk Registers capture safeguarding risks. The Council's Audit and Governance Committee monitor the Corporate Risk Register.
- 28 In line with recommendation 7 in our national report, the Council's Internal Audit has undertaken regular reviews of safeguarding. Internal Audit's reports go to the Audit and Governance Committee. Internal Audit's November 2017 Corporate Safeguarding Follow Up report gave a limited assurance rating of the Council's arrangements. A second follow-up report in July 2018 gave satisfactory assurance and a third corporate safeguarding follow-up audit is due to commence shortly. In addition to the work of Internal Audit, the Council has been doing service performance reviews, which include a question about safeguarding.
- 29 It is positive that the Council is transparent in its reporting of its performance against its safeguarding measures. [Appendix 2](#) sets out recent under-performance. Whilst a gradual upward trend in performance is apparent, it is starting from a low base and needs ongoing monitoring to ensure continued improvement.
- 30 The Council is effectively using learning to improve its safeguarding arrangements. In particular, the Designated Safeguarding Leads we spoke to were positive about the Learning and Development opportunities they had received, for example, specific safeguarding development days including speakers on topics such as domestic violence.

- 31 **Appendix 1** below sets out our assessment of how the Council has responded to the recommendations in the Auditor General's 2015 report **Review of Corporate Safeguarding Arrangements in Welsh Councils**.

Appendix 1

The Council has addressed the majority of the recommendations made in our 2015 national report on safeguarding

Exhibit 2: recommendations from the national report and progress made

Recommendations from the national report	Wales Audit Office assessment of Conwy County Borough Council's progress against 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"> 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>Recommendation met. Although various officers felt that they were personally accountable in this way, the CSP is clear that 'the final and indivisible' responsibility for safeguarding lies with the Strategic Director of Social Care and Education.</p>
<ul style="list-style-type: none"> the appointment of a lead member for safeguarding; and 	<p>Recommendation met. The Council has a Cabinet Member for Social Care (Children, Family and Safeguarding).</p>
<ul style="list-style-type: none"> regularly disseminating and updating information on these appointments to all staff and stakeholders. 	<p>Recommendation met. The Council's website is clear on who the lead member for safeguarding is. The Council's website includes the CSP, which is clear on respective roles and responsibilities. The Council told us such information is disseminated via emails, the intranet and the Designated Safeguarding Managers.</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>Recommendation met - There is a comprehensive CSP that is published on the Council's intranet and the Council's website.</p>

Recommendations from the national report	Wales Audit Office assessment of Conwy County Borough Council's progress against the recommendations contained in the national report
<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; • creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and • 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>First bullet point – Recommendation met. The Council's DBS checks policy covers all Council employees, apart from those appointed by a School Governing Body with a locally agreed procedure. The DBS policy also applies to agency workers, contractors, volunteers and student placements. The Council has a Recruitment and Selection Policy with a safe recruitment section.</p> <p>Second bullet point – Recommendation partially met. The Council is in the process of transferring records held on the separate system that was used by Education into its corporate iTrent system. Once that transfer has taken place, then this recommendation will have been met in respect of staff, although not in respect of volunteers as the Council has not yet rolled out the Volunteers' area in iTrent, which is currently being piloted in Youth Justice.</p> <p>Third bullet point – Recommendation met. The DBS Checks Policy applies to contractors and volunteers and the Council have provided us with contractual examples which stipulate the provider must ensure that recruitment of staff and volunteers is robust and safeguards children and adults at risk.</p>

Recommendations from the national report	Wales Audit Office assessment of Conwy County Borough Council's progress against 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"> • ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes; • 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 • 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>First bullet point – Recommendation met. Basic safeguarding training is mandatory for all staff.</p> <p>Second bullet point – Recommendation partially met. Safeguarding training information is recorded and monitored through iTrent for Council staff and elected members. The Council is piloting the development of a volunteers area of iTrent that could then capture safeguarding training information about volunteers. Training information in respect of schools staff and governors does not form part of the iTrent training information. Schools do not have the facility to input data directly into iTrent. It is the responsibility of Headteachers or the Designated Safeguarding Person in schools to keep a record of all staff who complete training and on what date, and they should be able to provide a list to the Council on request. The Council can compile training records if necessary via Hwb. The Council is considering transferring records for school staff to iTrent. The Council has stated that the training of school governors is schools' responsibility. However, as set out in paragraph 22 above, the Council needs to clarify the discrepancy between safeguarding training being mandated in the CSP, despite the Council telling us that it is not mandatory and Education Services hold a spreadsheet which logs Governors who have attended the enhanced training.</p> <p>Third bullet point – Recommendation met. The Council has contractual provisions that stipulate that it is the responsibility of the organisation providing the staff to ensure they receive safeguarding training.</p>

Recommendations from the national report	Wales Audit Office assessment of Conwy County Borough Council's progress against the recommendations contained in the national report
<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>Recommendation partially met.</p> <p>The Council reports safeguarding performance information to its Finance and Resources Scrutiny Committee. These include measures in respect of safeguarding training and DBS checks. Annual performance reports are reported to full Council and include safeguarding performance measures.</p> <p>The CSP annual report goes to the Social Care and Health Scrutiny Committee, but this does not contain performance measure information.</p> <p>Internal Audit Reports go to the Audit and Governance Committee.</p> <p>We have not seen evidence that service-based performance data in respect of safeguarding is reported to scrutiny or that benchmarking information is provided to scrutiny. Nor have we found evidence that the performance of contractors and commissioned services on compliance with Council safeguarding responsibilities has been provided to scrutiny.</p>
<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>Recommendation met.</p> <p>Internal Audit look at corporate safeguarding every year and have helped to raise the profile of the issue within the Council.</p>
<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>Recommendation met.</p> <p>Safeguarding features on the Corporate Risk Register and on all Service Level Risk Registers.</p>

³ Recommendation 5 was directed to the Welsh Government rather than councils so is not included in the above list.

Appendix 2

Conwy Council safeguarding – areas of poor performance:

Exhibit 3: Conwy Council safeguarding – areas of poor performance

Performance measure	Date reported and to whom	Figure reported
Percentage of employees completing the Corporate Induction within appropriate timescales (target is 100%)	12 January 2018 – Corporate Safeguarding Panel	19.3%
	10 September 2018 – Corporate Safeguarding Panel	70%
	Annual Performance Report 2017-18 – 18 October 2018 – Council	70%
	Mid-Year Corporate Plan Progress Report 2018-19 – 3 December 2018 to Finance and Resources Scrutiny Committee	43%
Percentage of staff commencing in post with two references (target is 100%)	12 January 2018 – Corporate Safeguarding Panel	Information not available
	10 September 2018 – Corporate Safeguarding Panel	36.6%
	Annual Performance Report 2017-18 – 18 October 2018 – Council	97.92%
	Mid-Year Corporate Plan Progress Report 2018-19 – 3 December 2018 to Finance and Resources Scrutiny Committee	89.4%
Percentage of staff receiving Safeguarding Training within 12 months of commencing in post (target is 100%)	12 January 2018 – Corporate Safeguarding Panel	17.9% (contains the caveat 'although reported corporately it does not cover schools as the majority of Education staff have done this')

Performance measure	Date reported and to whom	Figure reported
	10 September 2018 – Corporate Safeguarding Panel	18.5% (with the caveat that schools are not included)
	Annual Performance Report 2017-18 – 18 October 2018 – Council	18.5% (with the caveat that this data is for non-schools only)
	Mid-Year Corporate Plan Progress Report 2018-19 – 3 December 2018 to Finance and Resources Scrutiny Committee	31.3% (with the caveat that whilst the Corporate Safeguarding training is not yet available to schools as they access their training via 'Hwb' all schools have completed the Safeguarding training which was rolled out to them over 12 months ago)
Percentage of staff commencing in post with a DBS check where required (target is 100%)	12 January 2018 – Corporate Safeguarding Panel	Performance measure not reported
	10 September 2018 – Corporate Safeguarding Panel	35.88%
	Annual Performance Report 2017-18 – 18 October 2018 – Council	100%
	Mid-Year Corporate Plan Progress Report 2018-19 – 3 December 2018 to Finance and Resources Scrutiny Committee	76.60%

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