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Auditor General for Wales

Follow-up review of corporate arrangements for the safeguarding of children – **Newport City Council**

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This document is also available in Welsh.

The team who delivered the work comprised Gareth Jones, managed by Non Jenkins under the direction of Huw Rees.

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Summary report

Summary

What we reviewed and why

- 1 We undertook this review to seek assurance that the Council has acted upon our previous national recommendations and local proposals for improvements for corporate arrangements 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 during May 2019. The Council provided a self-assessment of its progress in addressing the recommendations and proposals for improvement made in 2014 and 2015. The Council provided documents to support its self-assessment. We then interviewed key officers and the lead member for Corporate Safeguarding.
- 3 Our review has been limited to reviewing the Council's self-assessment of its progress against our previous recommendations and proposals for improvement. We have not tested the effectiveness of the Council's safeguarding arrangements in practice as part of this review.

What we found

- 4 Our review sought to answer the question: **Can the Council provide assurance that it has addressed the recommendations and proposals for improvement contained in the Auditor General's national and local reports published in 2014-15?**
- 5 Overall, we found that: **the Council has acted on all our previous recommendations and proposals for improvement, however, aspects of some remain to be fully addressed.**
- 6 The Council considers safeguarding to be an important area of its corporate activity and its ethos is that 'safeguarding involves us all'. The Council has acted to address all of our previous recommendation, but has yet to fully address the previous national recommendations set out in the table below. **Exhibit 2** that follows sets out our assessment of the Council's progress in implementing each national recommendation and local proposals for improvement.

¹ Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Newport City Council**, October 2014

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

Exhibit 1: national recommendations that have yet to be fully addressed

The table below sets out the national recommendations that the Council has not yet fully addressed.

National recommendations that have yet to be fully addressed	
R3	<p>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.
R4	<p>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.
R6	<p>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.

Assessment of progress against the recommendations from our 2015 report and proposals for improvement from our 2014 report

Exhibit 2: assessment of the Council's progress in addressing the national recommendations

The table below sets our assessment of the Council's progress in addressing the national recommendations and local proposals for improvement.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ol style="list-style-type: none"> 1. the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; 2. the appointment of a lead member for safeguarding; and 3. regularly disseminating and updating information on these appointments to all staff and stakeholders. 	<p>Summary – Fully met</p> <p>The Council has appointed the Director of Social Services as the lead officer who is accountable for Corporate safeguarding. The Cabinet Member for Social Services supports the Director in raising the profile of safeguarding and ensuring that the Council fully complies with its Corporate Safeguarding policy.</p> <p>These roles and responsibilities are clearly defined and understood at political, senior managerial and operational levels. These roles are clearly set out in the 2019 Annual Corporate Safeguarding report. Information about the responsibilities is shared with employees on the Council's dedicated intranet pages about safeguarding. Those intranet pages are easily accessible and are given a high priority as they are located alongside the Council's Corporate and Well-being plans.</p>

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ol style="list-style-type: none"> 1. the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; 2. the appointment of a lead member for safeguarding; and 3. regularly disseminating and updating information on these appointments to all staff and stakeholders. 	<p>Summary - Fully met</p> <p>The Council posts information about the lead officer and member roles on its intranet for staff. It also regularly disseminates information about these appointments to staff by email and through its safeguarding champions across all service areas to those staff who may have limited or no access to the intranet.</p> <p>The Council could consider the following options to further strengthen its arrangements:</p> <ul style="list-style-type: none"> • ensuring that lead officer and lead member roles are clearly included in its Corporate Safeguarding policy when it is next updated; • ensuring that it communicates the names and roles of lead officers and members for corporate safeguarding to volunteers and contractors; and • ensuring that the Council's website includes information about safeguarding for the public.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>Local Proposal for Improvement 2</p> <p>The Council should clarify who designated officers with responsibility for safeguarding are.</p>	<p>See narrative above</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>Summary – Fully met</p> <p>The Council has a corporate-wide policy for children and vulnerable adults that covers all Council service areas, and applies to all elected members, employees, volunteers and contractors.</p> <p>The Council's approach is that 'safeguarding involves us all'.</p> <p>The policy was last updated in 2018 and is subject to reviews every two years, unless legislation requires more urgent changes. The policy clearly defines what constitutes abuse. The policy covers the definitions of safeguarding and how safeguarding is impacted by a wide range of related issues, including human trafficking and sexual exploitation.</p> <p>The policy is clearly linked to the Council's disciplinary policy, and there is a clear expectation that all those covered by the policy have a responsibility to report any concerns that they may have that may affect the safeguarding of children.</p> <p>The Council's Corporate Management team has a standing agenda item relating to safeguarding and this helps to provide clear leadership on safeguarding at the highest officer level.</p> <p>To further increase awareness that safeguarding involves everybody, the Council appointed Safeguarding Champions in every service area at the end of 2018. Their role is to ensure that the topic of 'safeguarding' is highlighted in every council service area and to ensure that the message that 'safeguarding involves us all' is routinely and regularly disseminated to all employees.</p> <p>The Council could consider the following options to further strengthen its arrangements:</p> <ul style="list-style-type: none"> ensuring that Safeguarding Champions receive the necessary support and training to undertake their role.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>Local Proposal for Improvement 1 Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding.</p>	<p>See narrative above</p>
<p>R3 Strengthen safe recruitment of staff and volunteers by:</p> <ol style="list-style-type: none"> 1. ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children; 2. creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and 3. 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>Summary – Partially met</p> <p>The Council has acted to strengthen its safe recruitment of staff and volunteers. The Council has a suite of policies and procedures which apply to all service areas and underpin its safer recruitment of staff including a clear DBS policy and volunteer recruitment guidance. Some of these policies pre-date the Corporate Safeguarding policy and would benefit from being refreshed to reflect that policy. The Council's policies are made available to school governing bodies to adopt.</p> <p>The safeguarding self-evaluation toolkit for schools gathers information on the safe recruitment of staff and safe recruitment is subject to regular periodic internal audit review in all schools. Although there is no national requirement to have a renewed check every three years, the Council is currently reviewing the frequency that school staff are required to renew their DBS checks. The Council anticipates reviewing its policy position on this issue later in 2019.</p> <p>The Council has also implemented an overarching safer recruitment policy that provides useful guidance to appointing managers and sets out the Council's expectations clearly. The Council's HR team provides ongoing support for recruitment to appointing managers.</p>

National recommendations from the 2015 report and local proposals for improvement from the 2014 report

Wales Audit Office assessment of Council's progress

R3 Strengthen safe recruitment of staff and volunteers by:

1. ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;
2. creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and
3. 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.

The Council has reviewed all employee posts to identify whether a post requires a DBS check and if so, at what level. The Council policy is not to use basic DBS checks but to require either a Standard or Enhanced check and barred-list checks for relevant posts. The Council has an integrated system to record and monitor compliance with DBS checks and that system enables employees to receive reminders to renew their checks. The Council's policy is for employees to receive a renewed check every three years. The Council's framework contracts with employment agencies ensure that safe recruitment checks are undertaken by those agencies and the Council verifies those checks when agency staff are employed.

The Council does require safe recruitment practices amongst partner organisations and contractors and has robust arrangements in place to monitor safe recruitment in education and social services.

However, at the time of our fieldwork we found that;

- the Council does not have a central system to record the recruitment of volunteers; and
- the Council recognises that it could ensure a more consistent approach to seeking assurance from contractors around safe recruitment across all service areas. The Council does not currently provide a programme of regular training to appointing managers around safe recruitment.

As such, the Council has further work to do to fully address this national recommendation.

In doing so, the Council should also look to;

- review its volunteer recruitment guidance to strengthen references to safeguarding;
- review how it can bring together information to assure itself around the safe recruitment of volunteers; and
- ensure a consistent approach across all service areas to seeking assurance from contractors around safe recruitment.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report

Wales Audit Office assessment of Council's progress

R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:

1. ensuring safeguarding training is mandated and coverage extended to all relevant Council service areas, and is included as standard on induction programmes;
2. 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
3. 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

Summary – Partially met

The Council recognises that training for staff and elected members is vital to implementing its ethos that 'safeguarding involves us all' and mandates training for staff and elected members. Basic safeguarding awareness is covered as a required part of Corporate induction programmes for new starters, and in 2018-19, 137 staff undertook this training. The content of this basic safeguarding awareness training is concise and covers the basic principles of safeguarding and therefore provides good initial awareness of this important topic to new staff.

Employees who may require additional safeguarding training to undertake their roles are able to access training provided through the Gwent Safeguarding Board.

The Council's safeguarding in education lead provides presentations to schools to ensure consistent messages for safeguarding in schools. Designated senior staff in schools receive specific safeguarding training on a regular basis and this training is extended to designated safeguarding governors too. The lead officer collects data from all schools about the training that designated senior staff for safeguarding have undertaken and whole staff training sessions.

However, at the time of our fieldwork we found that:

- although the Council mandates safeguarding training for all staff, it is in the process of currently developing an e-learning basic safeguarding awareness module to be completed by all employees. The Council anticipates that this module will be available from early Autumn 2019. This training will then be mandated for all employees and elected members as per the Council's policy. The Council has plans in place to ensure that staff without access to computers undertake the e-learning. The Council will track and monitor take-up of the safeguarding training through its online human resources database. However, this will extend to employees only.
- the Council also plans to develop a tiered safeguarding training framework for all employees and volunteers which will set out the required training for their roles.
- elected members are required to undertake mandatory safeguarding training. The Council's Corporate Safeguarding Unit has provided training sessions for elected members in 2017 and a further session is planned for July 2019.
- the Council sets out in its contractual arrangements with commissioned services the expectation that relevant staff in partner organisations who are commissioned to work for the Council in delivering services to children and young people undertake safeguarding training. However, the Council recognises that it could strengthen its assurance around the level of training that relevant staff receive.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report

Wales Audit Office assessment of Council's progress

R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:

1. ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;
2. 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
3. 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.

As such, the Council has further work to do to fully address this national recommendation. In doing so, the Council should also look to;

- implement its safeguarding training framework for all staff and volunteers and consider how this will be applied to commissioned services to ensure it gains greater assurance across all commissioned services in relation to safeguarding training for all relevant staff;
- establish whether all elected members should receive mandatory safeguarding training;
- clarify the timescale by which it expects all employees to have completed the initial basic safeguarding training e-learning module;
- clarify how often basic safeguarding training will be refreshed; and
- monitor completion rates for basic safeguarding training across all service areas and report data in annual corporate safeguarding reports.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>Local Proposal for Improvement 4</p> <p>Ensure all elected members and staff who come into contact with children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding. This should also include volunteers.</p>	<p>See narrative above</p>

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>R6 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>Summary – Partially met</p> <p>The Council's lead director for safeguarding has presented two annual Corporate Safeguarding reports to the Overview and Scrutiny management committee. The report is intended to provide elected members with assurance around the operation of the Council's safeguarding policy and procedures. Cabinet receive the findings of scrutiny's consideration of the report.</p> <p>The report does include the conclusions of internal and external audit/inspection reviews where relevant, and the April 2019 report referred to Estyn's findings relating to the Council's safeguarding policies and procedures during the education service inspection in November 2018.</p> <p>However, at the time of our fieldwork we found that;</p> <ul style="list-style-type: none"> • the annual Corporate Safeguarding report, does not currently reflect the considerable range of safeguarding activity that the Council undertakes; • the report does not include previous years' data to enable the reader to understand comparative performance, although the Overview and Scrutiny committee recommended in 2019 that future reports should include that data; • the report does not include a balanced and council wide set of performance information as previously recommended as it does not include; <ul style="list-style-type: none"> – service-based performance data; or – information on the performance of contractors or commissioned services unless issues are identified through Internal Audit or inspection. <p>As such, the Council has further work to do to fully address this national recommendation.</p> <p>In doing so, the Council should also look to;</p> <ul style="list-style-type: none"> • ensure that data is presented over time so that readers can understand changes in safeguarding performance; • ensure that service-based performance data is provided; • ensure that data relating to training and safe recruitment, including DBS checks and references, are clearly reported for employees and volunteers; and • ensure that the performance of contractors and commissioned services in terms of compliance with the Council's safeguarding responsibilities is reported.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report

Wales Audit Office assessment of Council's progress

Local Proposal for Improvement 3

Improve the range, quality and coverage of safeguarding performance reporting to members to provide adequate assurance that corporate arrangements are working effectively.

See narrative above

National recommendations from the 2015 report and local proposals for improvement from the 2014 report

Wales Audit Office assessment of Council’s progress

R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council’s safeguarding practices.

Summary – Fully met

The Council has a planned rolling programme of internal audit reviews that focus on the Council’s safeguarding practices. The internal audit service has a clear plan to review aspects of corporate safeguarding over the next four financial years. The internal audit service completed a review of the Council’s Corporate Safeguarding arrangements in Spring 2018. That review provided a reasonable assurance and identified some areas that required improvement including:

- reviewing the Council’s policies to ensure that these refer to members, partners and contractors and publishing those on the Council website;
- not all newly appointed staff have attended the corporate induction training; and
- general safeguarding training was not mandated for all staff and was not available

We found that the Council has already addressed most of those areas for improvement with clear plans in place to address the remaining issues.

Internal Audit considers aspects of safeguarding, including safer recruitment of staff during its audits of establishments, including schools.

However, at the time of our fieldwork we found that:

- there is not currently a process established by which any safeguarding-related areas for development would be shared with the lead officers for Corporate Safeguarding. Whilst Internal Audit reviews the safe recruitment of staff as part of the establishment audits for schools, the scope of those audits does not consider the safe recruitment of volunteers or contractors in schools.

The Council could consider the following options to further strengthen its arrangements:

- ensuring that when considering safer recruitment during internal audit, volunteers and contractors are considered alongside staff; and
- considering how safeguarding related areas for improvement identified during internal audits can be shared with the Corporate Safeguarding leads to inform training and policy development.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>Local Proposal for Improvement 5</p> <ul style="list-style-type: none"> Identify and agree an appropriate internal audit programme of work for safeguarding. 	<p>See narrative above</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>Summary – Fully met</p> <p>Safeguarding continues to feature as one of the Council's main corporate risks. The Council has developed a series of mitigating actions which are recorded and clearly aligned to actions stemming from the Internal Audit review of 2018. The corporate risk register is reviewed on a quarterly basis by the corporate management team and reported to Cabinet quarterly.</p> <p>The Council recognises that safeguarding risks are addressed within the Adult and Children Service Plans within 2018-19. The Council sets out clear guidance that all service areas are required to consider safeguarding risks in their service planning processes. However, the Council recognises that it does not currently have a process in place to challenge those considerations of safeguarding risks across all service areas.</p> <p>The Council could consider the following option to further strengthen its arrangements:</p> <ul style="list-style-type: none"> introducing a corporate review process of the safeguarding risks identified within service plans to ensure consistent identification of risks.

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