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Auditor General for Wales

# Follow-up review of Corporate Arrangements for Safeguarding of Children – **Monmouthshire County Council**

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This document is also available in Welsh.

The team who delivered the work comprised Charlotte Owen and Allison Rees, managed by Non Jenkins under the direction of Huw Rees.

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# Summary report

## Summary

### What we reviewed and why

- 1 The Auditor General for Wales' **Review of Corporate Safeguarding Arrangements in Welsh Councils** national report in 2015 concluded that Welsh councils' corporate assurance arrangements for overseeing the safeguarding of children were of variable quality.
- 2 This national report drew on local work the Wales Audit Office undertook at each of the 22 Welsh councils during 2014. The national report identified weaknesses in safeguarding arrangements and made seven national recommendations directed at all councils across Wales.
- 3 In addition to the national report, the Wales Audit Office reported separately on its findings at each council. For Monmouthshire County Council (the Council) we concluded in August 2014 that the governance, accountability and management arrangements for overseeing whether the Council was meeting its safeguarding responsibilities to children had some weaknesses and we made three specific proposals for improvement; these are set out in [Appendix 1](#).
- 4 In February 2017, we reported further weaknesses in the Council's safeguarding arrangements in our report **Safeguarding arrangements – Kerbcraft scheme**. The report concluded that children were being put at risk because of continuing weaknesses in safeguarding arrangements for the Kerbcraft scheme that the Council had not adequately addressed.
- 5 The Kerbcraft report included three statutory recommendations made under Section 25 of the Public Audit (Wales) Act 2004 which are set out in [Appendix 2](#).
- 6 In January 2018, in conjunction with Estyn and CiW, we undertook a Whole Authority review of safeguarding at the Council to assess whether the Council had adequate arrangements to safeguard children and was assured that these arrangements operated effectively across all areas of activity and interactions with children. We examined progress against the previous recommendations and proposals for improvement made to the Council in respect of safeguarding and considered some areas of enhanced risk, such as the Council's approach to looked after children, and some areas where services provided by the Council interact with children.
- 7 We concluded that children's safeguarding policy and procedures had recently improved, but there were shortcomings in some critical areas of policy and operation. We made four proposals for improvement and these are set out in [Exhibit 1](#).

Exhibit 1: 2018 proposals for improvement

Proposals for improvement	
<b>P1</b>	<p>Integrate safeguarding across the Council's policy framework. In particular:</p> <ul style="list-style-type: none"> <li>a. produce a 'project plan' identifying the underpinning work required and associated timescales to fully incorporate the Council's approach to integrating child and adult safeguarding.</li> <li>b. re-frame the strategic risk register, to enable a SMART-er approach to measuring the impact of actions taken in mitigation of identified risk.</li> <li>c. strengthen safeguarding policy and guidance in the areas identified in this report. Including: <ul style="list-style-type: none"> <li>– data protection arrangements and guidance linked to safeguarding;</li> <li>– embed whistleblowing policy arrangements through training and awareness raising; and</li> <li>– revise taxi licensing arrangements strengthening health and safety requirements..</li> </ul> </li> </ul>
<b>P2</b>	<p>Embed all aspects of safe recruitment, induction and training consistently. In particular:</p> <ul style="list-style-type: none"> <li>a. improve training records on safeguarding to show why the person received that particular level of training, when the training was received, and when it needs to be reviewed.</li> <li>b. ensure all people who have a specific role in safeguarding undertake appropriate training.</li> <li>c. clarify when enhanced DBS checks are required and ensure these are obtained in line with guidance.</li> </ul>
<b>P3</b>	<p>Ensure control arrangements are consistently applied and improve performance monitoring arrangements around safeguarding to include all areas of service operation to address all gaps in accountability. This should include issuing clear guidance to managers on information on safeguarding that should be included in reports to Members.</p>
<b>P4</b>	<p>Improve the Council's commissioning and contracting arrangements in relation to safeguarding children by finalising guidance on commissioning, contracting and volunteering from a safeguarding perspective.</p>

- 8 We undertook this review to seek assurance that the Council has made effective progress in addressing our 2018 proposals for improvements for corporate arrangements for safeguarding children.
- 9 We undertook the review between September and October 2019. The Council completed a self-assessment of its progress in addressing the proposals for improvement we made in 2018. The Council provided documents to support its self-assessment. We then interviewed key officers and the lead member for corporate safeguarding.
- 10 We have not tested the effectiveness of the Council's safeguarding arrangements in practice as part of this review.

## What we found

- 11 Our review sought to answer the question: **Can the Council provide assurance that it has made effective progress against the proposals for improvement contained in our 'Whole Authority review of Safeguarding' report published in August 2018?**
- 12 Overall, we found that: **the Council has responded positively to our report and recognises the progress it has made against the proposals for improvement and what more it needs to do to fully address them.**
- 13 **Exhibit 2** sets out our assessment of the Council's progress in implementing each proposal for improvement. The Council should maintain the momentum it has generated to ensure all proposals are fully addressed.

## Assessment of progress against the proposals for improvement from our 2018 follow-up report

### Exhibit 2: assessment of the Council's progress in addressing the proposals for improvement

The table below sets out our assessment of the Council's progress in addressing the proposals for improvement from our 2018 follow-up report.

Proposals for improvement from the 2018 report	Wales Audit Office assessment of the Council's progress
<p><b>P1</b> Integrate safeguarding across the Council's policy framework. In particular:</p> <p>a. produce a 'project plan' identifying the underpinning work required and associated timescales to fully incorporate the Council's approach to integrating child and adult safeguarding;</p>	<p><b>Summary – P1 c.iii. partially addressed. All other aspects of P1 fully addressed</b></p> <p>In 2018, the Council told us that the integration of aspects of its adult and children's safeguarding arrangements was 'work in progress'. In our report we suggested that the Council should produce a project plan to support this work. Since then the Council has integrated the service management responsibility for Adult and Children's safeguarding by appointing a Lead Service Manager with line management responsibility for both services and the Safeguarding Unit. The Council reports that by bringing both adult and children's safeguarding within the remit of the Safeguarding Unit with oversight by one manager, it enables it to better co-ordinate and develop safeguarding activity across the authority. As this work to integrate child and adult safeguarding has already taken place, a project plan is no longer required.</p> <p>The Council has no plans at present to further integrate the teams' operating functions but this will be kept under review.</p> <p>At the time of our fieldwork, a report on the Adult Safeguarding Service and Safeguarding Support due to go to Cabinet in late 2019 recommended additional resources to further strengthen safeguarding arrangements. These included restructuring the Safeguarding Unit Business Administration and creating a Safeguarding Business Manager. The report had already been taken to the Whole Authority Safeguarding Group (WASG) and DMT.</p>

<p>b. re-frame the strategic risk register, to enable a SMART-er approach to measuring the impact of actions taken in mitigation of identified risk;</p>	<p>The Council has taken steps to improve its risk management arrangements, including a refresh of its Strategic Risk Management Policy and guidance. The Council has updated the format of the strategic risk register to include timescales and responsibility holders for each mitigating action and an update on the progress and impact of implementing each action. The most recent substantive update of the register took place in January 2019.</p> <p>The Strategic Risk Register is informed by Service Business Plans, which include a section on service safeguarding arrangements. In order to strengthen the way services record and manage risks in Service Business Plans, the Policy and Performance Team appraised the 2018/2021 plans, providing feedback where improvements were required. A similar process is planned for the 2019/2022 plans. The Council has also delivered training sessions on business planning through TalentLab.</p> <p>Safeguarding arrangements and risks documented in Service Business Plans are informed, in turn, by the outcome of services' Safeguarding Audit Framework for Evaluation (SAFE), which assesses their compliance with the Council's Safeguarding Policy.</p>
<p>c. strengthen safeguarding policy and guidance in the areas identified in this report. Including:</p> <ul style="list-style-type: none"> <li>i. data protection arrangements and guidance linked to safeguarding;</li> <li>ii. embed whistleblowing policy arrangements through training and awareness raising; and</li> <li>iii. revise taxi licensing arrangements strengthening</li> </ul>	<p>The Corporate Safeguarding Policy was updated in November 2018 and now contains a brief section on data protection which emphasises that child protection overrides any concerns relating to data protection. The Council's Data Protection officer was consulted on the data protection arrangements in the updated corporate safeguarding policy.</p> <p>The Wales Audit Office published a separate report on Whistleblowing in September 2019. The report contains a review of whistleblowing training and staff awareness of the policy. Our review found the Council has strengthened its arrangements to make staff aware of the policy.</p> <p>The Council updated its Taxi and Private Hire Policy in June 2018 to incorporate recommendations from the Institute of Licensing around the suitability of applicants and licensees. The policy now contains a comprehensive section on protection of the public to ensure drivers and operators are 'fit and proper'.</p>



<p>health and safety requirements.</p>	<p>The policy notes that taxi drivers must attend refresher safeguarding training and undergo DBS checks every three years as part of licence renewal requirements. Licence conditions require drivers and private hire operators to inform the Council of any offences or concerns. Officers we spoke to were confident that Licensing Officers are made aware of non-compliance with this requirement through local intelligence and information from the Council's Social Services, Passenger Transport and Safeguarding Unit and the Police. Licensing Officers work with the Police on enforcement operations and the Police have a duty to inform the Council of any 'public concern' issues in relation to taxi drivers. The Council could strengthen these arrangements by establishing a process to actively check ongoing compliance with licence conditions during the three-year licence period. This would help provide assurance that the arrangements currently in place, which rely on others to inform the Council, work effectively. The Council gains assurance that private hire operators only subcontract bookings to other licensed reputable operators through regular checks of booking details.</p> <p>The Council's Public Transport Programme Board is currently reviewing passenger transport. The review includes a number of workstreams, including workforce, private hire, bus transportation, route optimisation, procurement and software monitoring systems. The latter will help strengthen safeguarding arrangements for home school transport by providing live data on pupil bus usage. The Safeguarding and Quality Assurance Service Manager attends the Board as a safeguarding consultant and is assured on arrangements.</p>
<p><b>P2</b> Embed all aspects of safe recruitment, induction and training consistently. In particular:</p> <p>a. improve training records on safeguarding to show why the person received that particular level of training, when the training was received, and when it needs to be reviewed;</p>	<p><b>Summary – Partially addressed</b></p> <p>The Council is reviewing the systems currently recording safeguarding training records. At the time of our fieldwork, the Council had two central records to record staff safeguarding training. This is under review as the Council is finalising a service specification to tender a new payroll and HR system. The intention is for the new system to record future safeguarding staff training records. The Council anticipates that this new system will enable it to fully meet the requirements of this proposal for improvement. The tentative timeframe for this system to be operational is Autumn 2020.</p> <p>In the meantime, one current central training record – My View - has been reviewed. All directorates checked the system to ensure all current staff are recorded as well as the level of safeguarding training undertaken. The intention is to undertake a further validation check in six months, prior to the implementation of a new central system. The review helped provide clarity on what training information a new central system needs to capture and informed the development of the service specification for the new payroll and HR system.</p>

<p>b. ensure all people who have a specific role in safeguarding undertake appropriate training;</p>	<p>A review of the current central system for recording safeguarding training forms part of Internal Audit's 2019-20 audit plan.</p> <p>The Council's Corporate Safeguarding Policy sets out safeguarding training requirements according to the level of contact a job role has with children, young people and adults at risk. This applies to the whole workforce, including volunteers, agency staff and contractors.</p> <p>All staff are required to undertake basic safeguarding awareness training and the Council provides this through its corporate induction programme for new starters. If employees require Level 1 and Level 2 safeguarding training, there is a rolling programme for staff to register and receive the training. Level 3 training for those working directly with children or adults at risk is arranged as required.</p> <p>Managers are responsible for ensuring that staff are able to access the right training for their needs, as set out in the Corporate Safeguarding Policy, and that training received is logged centrally on the Resourcelink database. In addition, each Directorate that has direct contact with the public has a nominated Directorate Safeguarding Lead (DSL). DSLs are responsible for ensuring that the workforce within their Directorate attend training at levels appropriate to their roles and functions and that safeguarding responsibilities are highlighted through staff induction processes, team meetings, supervision and staff briefings.</p> <p>The Council gains assurance over safeguarding training through the bi-annual completion of the SAFE process. This requires every directorate to demonstrate that all staff and volunteers are assessed in relation to safeguarding training needs, receive an appropriate level of safeguarding training, and that relevant records are maintained.</p> <p>As noted above, the Council has reviewed its central training record held on the Resourcelink database to ensure that all current staff and the level of safeguarding training they have received is recorded. Training records are now updated centrally following submission of training course attendance lists and the Corporate Safeguarding Policy clearly sets out this new process. The Council has an ongoing action to ensure that training records are regularly and consistently updated.</p> <p>The Council told us that whilst the annual appraisal process identifies the workforce's ongoing safeguarding training requirements, the additional reporting functionality of a new payroll and HR system will further strengthen arrangements by more easily identifying gaps. The Council should ensure that, as it gains greater clarity over gaps</p>
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<p>c. clarify when enhanced DBS checks are required and ensure these are obtained in line with guidance.</p>	<p>in safeguarding training, it takes the necessary steps to address the gaps and make sure that all staff have received appropriate training.</p> <p>All Cabinet members are Level 4 trained in Strategic Leadership of Safeguarding and non-Cabinet members receive Level 1 training. The Internal Audit IA team have also received level 1 safeguarding training. Although not yet confirmed, Internal Audit are likely to review safeguarding training towards the end of 2019-20.</p> <p>The Council is also currently working towards recruiting all of its volunteers through the Volunteer Kinetic digital management system, a central record of volunteer safe recruitment information and activity. The system ensures that safe recruitment checks, proportionate to the role, are carried out and logged on the volunteer's profile. Safeguarding training is also logged on the system.</p> <p>Electronic DBS processing was introduced in August 2018. This ensures that all posts are consistently checked against Home Office guidance to determine whether an enhanced DBS check is required.</p> <p>The Council's DBS Policy sets out what constitutes regulated activity and refers managers to the Home Office eligibility guidance tool to determine what level of DBS check an activity or role requires. In addition, all ID checkers are required to attend mandatory one hour DBS training, which covers eligibility and signposts delegates to the Home Office tool and the DBS page on the Council's intranet.</p> <p>The electronic DBS processing platform is provided by Powys County Council which runs a DBS unit and provides DBS eligibility advice to Monmouthshire CC if needed.</p>
<p><b>P3</b> Ensure control arrangements are consistently applied and improve performance monitoring arrangements around safeguarding to include all areas of service operation to address all gaps in accountability. This should include issuing clear guidance to managers on information on</p>	<p><b>Summary – Partially addressed</b></p> <p>The Council considers its SAFE audits and action plans key to measuring services' compliance with the Corporate Safeguarding Policy and ensuring consistency. The Safeguarding Unit reviews the SAFE self-assessments, providing support and guidance where necessary, and the Whole Authority Safeguarding Group monitors performance against the SAFE action plans.</p> <p>Starting in September 2019, the Council is establishing a series of workshops with the Whole Authority Safeguarding Group to challenge directorates on their SAFE audits and whether safeguarding is embedding</p>

<p>safeguarding that should be included in reports to Members.</p>	<p>across the organisation. The workshops aim to put safeguarding in context by using case studies of safeguarding in practice to help embed further learning in the directorate and, where appropriate, council-wide.</p> <p>The role of Internal Audit in relation to children’s safeguarding is set out in the Corporate Safeguarding Policy. Internal Audit intended to conduct a review of safeguarding in 2018-19, however, this review was not scoped due to a change in Chief Officer. A Safeguarding review is in Internal Audit’s 2019-20 audit plan. At the time of our fieldwork, Internal Audit were arranging a meeting with the Safeguarding and Quality Assurance Service manager and Chief Officer to scope this work. Internal Audit intend to undertake the review during late Q3/early Q4 and the approach will be Council-wide with a possible focus on safeguarding training.</p> <p>Recent Internal Audit reviews on agency workers and volunteering were assessed as limited assurance and reasonable assurance respectively. The review of agency workers identified inconsistencies in obtaining satisfactory assurances or spot-checking that this had been done. It noted that reliance was placed almost exclusively on the agency for performing safe recruitment checks. However, the fieldwork took place between May and August 2018 and was based on a sample of 20 agency workers used during the 2017-18 financial year. Since then, the Council has implemented its SAFE audit process across the Council, which may have helped strengthen arrangements. A follow-up review of agency workers, scheduled for 2020-21, will provide assurance on this. We noted that the agency workers report was issued in draft in January 2019, but at the time of our fieldwork, the report had not yet been cleared and finalised. As a result, there was no management response demonstrating how the Council planned to address the issues raised. The Council should ensure that draft internal audit reports are dealt with in a timely manner so that assurances can be provided and corrective action taken to respond to the issues raised.</p> <p>The Whole Authority Safeguarding Group does not routinely receive Internal Audit reports with safeguarding issues. The Internal Audit manager will attend the Group as and when needed. Officers suggested that closer links between Internal Audit and the Whole Authority Safeguarding Group would be beneficial but resource and staff capacity within the Internal Audit team restricts this.</p> <p>The Council’s Corporate Safeguarding Policy states that the Whole Authority Safeguarding Group will provide an annual report to SLT, Cabinet and Scrutiny. The group produces a Safeguarding Evaluation Report for Safeguarding to fulfil this requirement. The most recent report went to scrutiny committee in November 2019 and will go to Council in December. The report assesses the Council’s progress against the Corporate Safeguarding Policy’s priorities:</p>
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	<ul style="list-style-type: none"> <li>• Good governance</li> <li>• Safe workforce</li> <li>• Preventative approach</li> <li>• Robust protection</li> <li>• Safe services</li> </ul> <p>For each of these priorities, the report sets out what good looks like, summarises progress during the year and identifies improvement actions to take forward, which are summarised in an appended action plan. Based on this evidence, the Whole Authority Safeguarding Group scores the effectiveness of current arrangements. Prior year scores are also provided to enable comparison. The format of the report has been simplified and information is presented in a clear and easy to understand way. However, other than the overall score, there is little qualitative comparative data for prior years to assess current year performance against and no comparative data from other councils. Also, the report provides a high-level summary and so does not include directorate level detail for members to scrutinise or get assurance from. The Council should continue to use feedback from members to refine the information included in safeguarding reports.</p> <p>The Director of Social Care and Health’s Annual Report presented to full Council and Joint Children and Young People/Adults Select Committee includes a specific section on Safeguarding. The Council’s Audit Committee also receives regular reports on progress on actions arising from external audit recommendations, including the previous Wales Audit Office safeguarding reports.</p> <p>All reports to members include a section on Equality and Future Generations, which includes safeguarding, and guidance is available on completing this section. The Council originally planned to support the updated report template with specific report writing training but has not yet done so. It has instead focussed on training and awareness raising using the Council’s intranet and existing training on the managers’ induction programme. The Council plans to continue raising awareness around report writing and provide further training.</p> <p>The proposed new Safeguarding Business Manager role in the Safeguarding Unit, mentioned above in P1, is expected to help strengthen performance management and reporting. It is envisaged that the role will support the Unit by developing a quality assurance framework and work trackers, collating information, supporting the SAFE audits, and facilitating the production of reports and core data. This will ensure the Director and the Whole Authority Safeguarding Group have clear information to measure progress, outcomes and impact.</p>
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<p><b>P4</b> Improve the Council's commissioning and contracting arrangements in relation to safeguarding children by finalising guidance on commissioning, contracting and volunteering from a safeguarding perspective.</p>	<p><b>Summary – Partially addressed</b></p> <p>The Council has developed minimum standards for safeguarding across commissioned services, partnerships and volunteers and a self-assessment framework for all directorates to complete. Social Care and Health was the first service area to complete the self-assessment. At the time of our fieldwork, the Council was behind schedule in rolling this out to other directorates but intended to do so at planned workshops from September 2019 onwards and incorporate into the SAFE Audit process. As part of their preparation for the workshops, each directorate undertakes an overview assessment with the framework to identify any high-risk areas and necessary actions. Performance against these actions will be reported to the Whole Authority Safeguarding Group.</p> <p>The Council's minimum standards document includes a matrix to assess the risk level of a service's activity in relation to safeguarding and determine the level of safeguarding arrangements required. It also sets out 10 minimum safeguarding standards for working with commissioned services, partners and volunteers.</p>
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# Appendix 1

## Recommendations: Auditor General for Wales' Review of Corporate Safeguarding Arrangements in Welsh Councils, 2015

Exhibit 3: local proposals for improvement for Monmouthshire County Council from the Auditor General for Wales' 2015 Review of Corporate Safeguarding Arrangements in Welsh Councils

Proposals for improvement	
<b>P1</b>	Review the Safeguarding and Child Protection Policy to ensure it adequately covers all Council services.
<b>P2</b>	Ensure development of the Safeguarding and Quality Assurance Unit enables it to deliver its planned objectives.
<b>P3</b>	Improve the range, quality and coverage of safeguarding performance reporting to provide adequate assurance that systems are working effectively.

# Appendix 2

## Statutory recommendations: Auditor General for Wales' Safeguarding arrangements – Kerbcraft scheme local report, 2017

### Exhibit 4: statutory recommendations

Recommendations	
<b>P1</b>	The Council should keep complete records in relation to volunteers, including evidence of DBS checks, occupational health questionnaires, safeguarding training, and reference details.
<b>P2</b>	The Council should develop specific internal guidance and procedures for the operation of its Kerbcraft scheme so that staff are clear about how the scheme should operate.
<b>P3</b>	The Council should establish effective performance management and scrutiny arrangements for the Kerbcraft scheme, and clarify the roles of the Safeguarding and Quality Assurance Unit and Internal Audit in those arrangements.





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