

**SUBJECT: SAFEGUARDING EVALUATION REPORT April 2018 – March 2019**

**MEETING: Adult Select Committee**

**DATE: 5<sup>th</sup> November 2019**

**DIVISION/WARDS AFFECTED: ALL**

## **1. PURPOSE:**

The purpose of this report is:

- To evaluate the progress of Monmouthshire County Council's key safeguarding priorities during 2018/19, highlighting progress, identifying risks and setting out clear improvement actions and priorities for further development.
- To inform Members about the effectiveness of safeguarding in Monmouthshire and the work that is in progress to support the Council's aims in protecting children and adults at risk from harm and abuse.
- To inform Members about the progress made towards meeting the standards in the Council's Corporate Safeguarding Policy approved by Council in July 2017, amended January 2019 (see appendix 4).

## **2. RECOMMENDATIONS:**

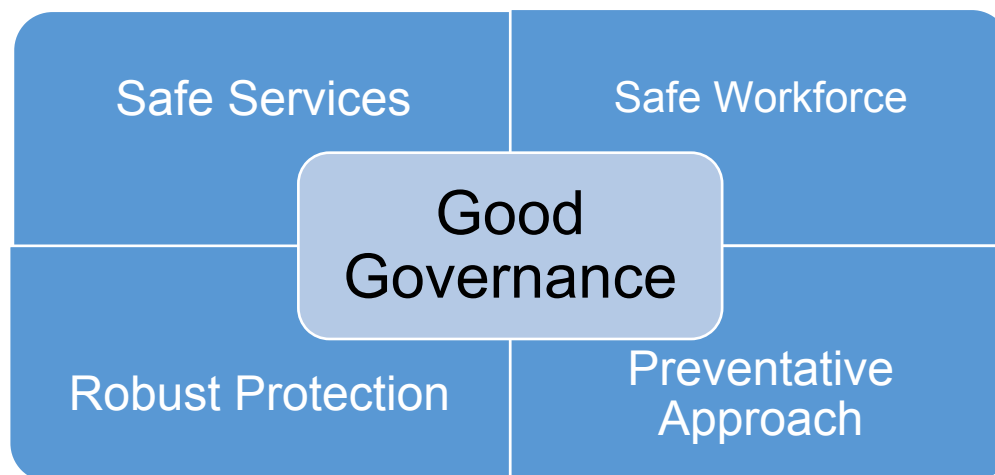
- 2.1 Following scrutiny, it is recommended that the Safeguarding Evaluation Report and Action Plan is presented to full council in December.

## **3. KEY ISSUES:**

- 3.1 This safeguarding evaluation (see appendix 2) is based on activity and information from April 2018 to March 2019. Where relevant we have taken an 'as is' position in terms of progress, given the time lag. Following the amended policy members should now expect an annual safeguarding report (rather than 6-monthly).
- 3.2 The report is developed within the context of the approved Monmouthshire County Council's Corporate Safeguarding Policy which covers duties for both children and adults at risk in line with the Social Services and Well Being (Wales) Act (2014). The analysis within the report reflects progress against priority areas set out within the policy and draws on data and information

concerning both groups. The 5 cornerstones of safeguarding within the Corporate Safeguarding Policy are set out below (Table 1).

**Table 1: The Cornerstones of safeguarding in Monmouthshire**



- 3.3 Embedding and sustaining the highest standards of safeguarding is a continuous endeavor. This evaluation report forms an integral part of the improvement of safeguarding practice across the Council, and drives the work of the Whole Authority Safeguarding Group. The report tries, wherever possible, to balance qualitative and quantitative data as well as drawing in other sources of information to support the evaluation. It asks critical questions about what are we trying to achieve, how well we are doing, what is the evidence to support our analysis and what are our next steps. The report is at appendix 2.
- 3.4 The self-assessment score has been agreed by the Whole Authority Safeguarding Group on the basis of evidence reviewed to date and critical challenge. It uses the corporate scoring framework (Appendix 1) to provide an overall judgement of effectiveness. The current self-assessment is at Table 2.

**Table 2: Self-assessment scores as at March 2019**

<b><u>Cornerstone of Safeguarding</u></b>	<b><u>April 17 -Sept 17</u></b>	<b><u>Oct 17- March 18</u></b>	<b><u>April 2018 – March 2019</u></b>
Good Governance	4	5	5
Safe Workforce	3	4	3
Preventative Approach	3	4	4
Robust Protection	4	4	4
Safe Services	2	3	3

- 3.5 Priority improvement actions arising from the evaluation form the basis of the WASG action plan which is implemented and monitored through the Whole Authority Safeguarding Group (see appendix 3).

**4. OPTIONS APPRAISAL**

Not applicable to this report

**5. EVALUATION CRITERIA**

Each ‘cornerstone’ section of the report opens with descriptors of ‘what good looks like’. These descriptors provide the basis of how we measure the standard over time using both qualitative and quantitative sources.

Safeguarding progress is now reported on an annual basis to CYP and Adult Select Committees and Council.

**6. REASONS:**

- 6.1 This evaluation report is completed within the context of Monmouthshire County Council’s background and history in respect of safeguarding as set out in brief below and represents a further opportunity for Members to consider the distance travelled by the Local Authority in improving safeguarding practice.

- 6.2 Council Members will be aware that in November 2012 the Local Authority was found to have inadequate safeguarding arrangements in place. Shortcomings included a lack of safeguarding policy as well as operational weaknesses particularly within a schools based context.
- 6.3 The Safeguarding and Quality Assurance Unit was established within Children's Services in 2012 quickly extending its role to supporting the Authority's improvement journey around children's safeguarding.
- 6.4 In February 2014 an Estyn monitoring visit recognised that the council had appropriately prioritised safeguarding and 'set the foundations well for recovery' particularly at service and practitioner. However, the authority still did not have 'effective enough management information systems and processes to enable it to receive appropriate and evaluative management information about safeguarding'. This criticism was echoed by a subsequent Welsh Audit Office review of safeguarding in March 2014.
- 6.5 In response to this the council established the Whole Authority Safeguarding Group (WASG) initially chaired by the Chief Executive with a focus specifically on children. The inaugural meeting took place in July 2014.
- 6.6 The Local Authority came out of Special Measures in November 2015 when strong progress in safeguarding was recognised.
- 6.7 A recommendation was subsequently made to Cabinet and endorsed in July 2016 allowing the work of the WASG to incorporate safeguarding for adults at risk so that good practice and learning could be mutually shared, and marking the statutory basis of adult safeguarding as a consequence of the Social Services and Wellbeing (Wales) Act 2014.
- 6.8 Members will also be aware that Wales Audit Office issued statutory recommendations in respect of safeguarding in respect of the Council's Kerbcraft service in January 2017. This was followed by a Wales Audit Office led inspection which took place in January 2018, in partnership with both CIW and Estyn. The report to this was issued in August 2018 and scrutinised by CYP Select in October 2018. There were 4 main proposals within the report including further strengthening of the policy framework; further steps to ensure a safe workforce and safeguarding within commissioning.
- 6.9 The WAO conducted a follow up 'light touch' inspection to this in September 2019. To date, we have not received the written outcome.

## **7. RESOURCE IMPLICATIONS:**

There are no resource implications to this report.

**8. WELLBEING OF FUTURE GENERATIONS IMPLICATIONS (INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING):**

This report is critically concerned with the effectiveness of safeguarding in Monmouthshire County Council.

**9. CONSULTEES:**

Whole Authority Safeguarding Group  
Julie Boothroyd – Chief Officer  
Diane Corrister – Safeguarding Manager

Consultation feedback from the Joint Select Committee will be built in to the report as it is completed ready for full Council.

**10. BACKGROUND PAPERS:**

Corporate Safeguarding Policy (Appendix 4)

**11. AUTHOR:**

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## Appendix 1

### The Corporate Evaluation Framework

<b>The evaluation score from 1-6</b>	<b>The evaluative context</b>
<b>Level 6 Excellent</b>	<b>Excellent or outstanding</b>
<b>Level 5 Very Good</b>	<b>Good Major strengths</b>
<b>Level 4 Good</b>	<b>Important strengths with some areas for improvement</b>
<b>Level 3 Adequate</b>	<b>Strengths just outweigh weaknesses</b>
<b>Level 2 Weak</b>	<b>Important weaknesses</b>
<b>Level 1 Unsatisfactory</b>	<b>Major weakness</b>

**APPENDIX 2**  
**The Evaluation**

**1). Good Governance**

**SELF-ASSESSED SCORE = 5**

**What does good look like?**

In Monmouthshire County Council, we ensure that safeguarding for children and adults at risk is understood as “everyone’s responsibility”. We work effectively with regional structures including the Gwent Safeguarding Board. There is continuous focus – and aligned systems and activities – to ensure safeguarding is being culturally embedded across the Council at a “hearts and minds” level. Safeguarding is supported by policies and operating procedures which are embedded within all settings and services.

**Progress and Evidence**

The Corporate Safeguarding Policy was reviewed and updated in Jan 2019 to include a clearer link to Data Protection issues and Whistleblowing.

The policy will be routinely reviewed 3 yearly.

The Whole Authority Safeguarding Group meets 6-weekly, chaired by the Statutory Director (Chief Officer) and minutes are retained. Every directorate is represented.

A safeguarding ‘self-assessment’ is undertaken every other year on a directorate basis via the Safeguarding Assessment Framework for Evaluation (SAFE). This is currently underway and will be completed over the next 6 months. The key development this year, has seen directorates sharing the outcomes of their SAFEs through a work-shop approach, using real case studies from their service areas to demonstrate safeguarding in action.

There continues to be full representation at all levels of the work of the regional safeguarding board and VAWDSV board.

There is strong engagement in regional approaches to Multi-Agency Sexual Exploitation meeting (MASE) Child Sex Exploitation (CSE), Violence Against Women Domestic Abuse and Sexual Violence (VAWDASV) and Contest (PREVENT anti radicalisation).

**Analysis**

The work of the WASG continues to be a major strength which is reflected in our self-assessment score as 5.

The key development this year, has seen directorates sharing the outcomes of their SAFEs through a work-shop approach, using real case studies from their service areas to demonstrate safeguarding in action. This reinforces that safeguarding is part of everyone’s day job, as well as increasing cross-directorate understanding and allowing any issues regarding safeguarding practice to be emerge and promoting a learning culture.

The previous use of the SBAR to report and record risks and the management of risk has been considered by the Whole Authority Safeguarding Group and different forms of reporting and management are being developed to support a learning culture as well a safe management of risk.

There continues to be a strong Monmouthshire engagement with regional safeguarding boards and involvement in the Strategic and Operational Safeguarding groups. Across GWENT Monmouthshire is leading in terms of the development of Exploitation and Modern Day Slavery processes and training, including Criminal Exploitation and "County Lines" Drug supply.

Monmouthshire has also had an active role in the new All Wales Child and Adult Protection Procedures consultation processes, and are preparing for their launch in November 19

### Key Next Steps for 2019 - 2020

Complete the SAFE process and evaluate learning and outcomes for future planning

Ensure that there is good awareness across the Council of the new All Wales Child and Adult Protection Procedures

## **2). Safe Workforce**

### SELF-ASSESSED SCORE = 3

#### What does good look like?

We ensure that safe recruitment and human resource practices operate effectively and are embedded across the Council for the whole workforce (on pay roll and volunteer). We ensure that the workforce working with children and adults at risk are suitable for the role they are employed to do and are focused on outcomes for people. The whole workforce is clear about their duty to report concerns and to keep children and adults at risk safe.

#### Progress and Evidence

##### Safe Recruitment

100% staff with DBS in this time period (Employee Services).

100% of volunteers undergone Safe Recruitment process

Further 4 managers undertook Safe Recruitment Training (Training Dept) this is a rolling program with new managers and is to be added to corporate induction programme

All 32 HR Business Partner school visits have been undertaken to check safe recruitment compliance. These are reporting 100% compliance.

##### Volunteers

In regards to volunteers, a Volunteer Kinetic digital management system is in place. This means we have a live central record of volunteer safe recruitment information and activity. The system is structured so dependent on the role the proportionate amount of safe recruitment checks are carried out and logged on the volunteers' profile, also training is logged on the system for example Safeguarding Level 1.

##### Training

Every Leisure Centre has appropriately trained Safeguarding Leads - 100% Compliance.

100% of volunteers recruited in this period undertook Safeguarding Training in this period.



At year end 1747 staff members had completed level 1 training and 48.21% of workforce were identified as requiring training at this level.

38 trainers within the council are trained to deliver Level 1 Safeguarding within their service areas.

Basic Awareness safeguarding training has been undertaken by 38 Council Members Level 1, 35 at Level 4, 7.

100% of schools have up to date whole school Safeguarding training plans in place

Governor specific safeguarding training is delivered each term as necessary by the Education Safeguarding Lead

#### Managing Professional Allegations

The Safeguarding and Quality Assurance Unit has managed the following professional allegations between April 18 and March 19:

Professional Strategy Meetings –

33 adult professionals discussed in relation to 33 children;

24 were concluded in this period.

10 Substantiated.

11 Unsubstantiated.

3 Unfounded.

In Relation to Professional Concerns in Adult Safeguarding new guidance is currently being drafted by the Protocols Group of the Safeguarding Board to support developing process.

#### Analysis

Safe recruitment under the Corporate Safeguarding Policy continues to be a priority. Processes to ensure that safe recruitment checks for paid and unpaid staff are undertaken prior to full employment and compliance levels around this shows a robust system, that is now thoroughly embedded. Systems are in place to support safe recruitment and an established risk assessment process is in place to review any anomalies within these processes.

The identification of role-related safeguarding training needs has informed the Safeguarding Training Plan, and processes for accessing training have been simplified and are working effectively. There is further opportunity for checking safeguarding training needs through the current SAFE process, with the Safeguarding Unit ensuring that staff appointed to the Designated Safeguarding Lead roles are trained to the correct level, and that the training plan is robust and resilient.

Monmouthshire is fully compliant with the management of Professional Concerns Guidance within Children and Adult Services. Changes to these processes are anticipated in the new Wales Adult and Children Protection Processes launched by the Welsh Assembly Government in November 19, and Monmouthshire are actively involved in the drafting of new protocols with the Gwent Safeguarding Boards.

The downward score of 3 from 4 represents the concerns of the WASG that achieving a watertight system for centrally recording and monitoring employee data regarding

safeguarding training from the point of recruitment onwards remains problematic. There is due to be a significant upgrade to the current data base, however, in the interim and during the upgrade it is an area of potential vulnerability.

**Key Next Steps for 2019 – 2020**

Collate training data from the outcomes of the SAFEs and revise the training plan accordingly

Implement the upgrade of the HR data base from safeguarding perspective

**3). Preventative Approach**

**SELF-ASSESSED SCORE = 4**

**What does good look like?**

We are working well with partners to identify emerging issues, risks and challenges to our communities. We are able to demonstrate clear multiagency approaches to developing protocols, processes and practice in how we are responding to these issues therefore reducing risks through early intervention and preventative approaches.

**Progress and Evidence**

Responding to Emerging Issues

Training plans are in place to ensure the right levels of training in VAWDASV and PREVENT including at staff induction.

PREVENT awareness raising has been delivered in all Monmouthshire Schools and continues to be a rolling program of training with a new Gwent funded PREVENT co-ordinator

Year end Figures March 2019 for delivery of VAWDASV level 1 training–

Enterprise -43%

Leadership 49%

Resources 79%

SC/H 55%

CYP 77%

Schools 62%

Child Sexual Exploitation, County Lines, and Modern Day Slavery is delivered as a Level 3 training, included in Level 2 training and training and included in Level 1 integrated Safeguarding training.

Working through multi-agency approaches to tackle safeguarding issues

During this period 17 children were subject to CSE Strategy Meetings and 7 made subject to Operation Quartz (45 meetings).

Local Safeguarding Networks Meetings were held in Sept 18, Jan 19 and March 19 with increased attendance from statutory and 3rd sector involvement.

Safeguarding Practitioner Forums in May 18 focused on Adult and Child Mental Health and in Nov 18 focused on Criminal Exploitation and Modern Day Slavery.

120 members of statutory and 3rd Sector services attended Practitioner Events May and November 2018.

Child Protection Co-ordinator attends monthly meetings with licencing to discuss arising regulation and community safeguarding issues.

Fortnightly MASE Meetings continue with Monmouthshire's CP Co-ordinator vice chair - (Multi Agency Sexual Exploitation meetings) with Police to identify patterns, locations and perpetrator identification.

This year has seen the Development of the Monmouthshire Exploitation Group which has representation from Safeguarding Unit, Public Protection, Partnerships, Police, Gwent Missing Children's Team, Education, Community Based teams.

This group has overseen the development of a Monmouthshire Protocol for responding to Modern Day Slavery and Exploitation. This protocol supports the links and the works of SAFER Monmouthshire Group, and the Monmouthshire Organised Crime Group. It continues to include collaborative working between Licencing and the Gwent Missing Children's team and Police in regard to Operation Make safe - CSE in Hotels, Pubs, Taxi's

The Safer Monmouthshire partnership Group now has clear lines of communication via membership and reporting lines to the newly developed Crime and Disorder Group, Serious Organised Crime Group and Monmouthshire Exploitation Group.

#### Providing Effective Early Help

The Information/ Advice and Assistance (IAA) facility at the front door of Children's and Adults (FISH) services are regularly monitored and reviewed.

Increase from 1515 to 1911 Adults received IAA Sept -March.

703 Children/families received IAA Sept- March.

The Early Help Panel within Children's Services has been operating since Jan 18 and continues to develop. This now includes Primary Mental Health Services and CAMHS.

#### Analysis

Preventative approaches remain a strong area of safeguarding practice within Monmouthshire. The score remains at 4 in recognition that there is always more to do in ensuring that all aspects of the council are equally informed about and can recognise safeguarding issues. Equally, safeguarding is an ever changing landscape and whilst there are mechanisms in place to recognise emerging issues (such as county lines) there is never room for complacency. The SAFE process this year, and the WASG meeting programme, is aimed towards supporting preventative approaches.

This period has seen the network and partnership approach embed structures and processes which identify and target vulnerabilities in our communities. Newly developed Exploitation protocols have built on the foundations of previous strengths within the authority, and the reporting and information sharing pathways between statutory services,

and operational partners have supported the early identification of concerns, and multiagency strategies to address these issues at an earlier point. Newly developing work streams will need to be monitored and adapted in order to develop baselines for reporting and working flexibly as themes and understanding evolve.

Community based resources identified previously (Community Hubs, Families First programs, and Community Wellbeing Development Officers) continue to support our communities and meet need and support information sharing in relation to risk.

Partnership working to link community safety and wellbeing to wider community based criminality has focused on the identification of persons of concern, locations and disruption activities

The Early Support Referral Pathway continues to work effectively in meeting need and outcomes for families and children, this continues to develop with new developing strands of work with health to consider early intervention with Child and Adolescent mental health.

#### **Key Next Steps for 2019 - 2020**

Support the on-going development of integrated approaches to exploitation through the MASE work

Ensure full roll-out of the Modern Day Slavery protocol

Review the outcomes from the Early Help Panel

WASG to retain oversight of the implementation of the Transport Programme board from a safeguarding perspective.

#### **4). Robust Protection**

##### **SELF-ASSESSED SCORE = 4**

##### **What does good look like?**

We operate best practice in protecting children and adults at risk and ensure that all concerns about possible abuse or neglect are recognised and responded to appropriately. Multi-agency plans and interventions reduce risks and needs for children and vulnerable adults including those at risk of significant harm.

##### **Progress and Evidence**

Within Children Services Assessments being completed within statutory timescales remain high, benefited by a more stable workforce.

In Children's services an initial decision a referral is made within 24 hours in 98.3% and 95% of assessments in children's services were completed within statutory timescales.

There is a continued upward trend in respect of both Child Protection Registrations and Children who are Looked After.

The number of children on the Child Protection Register at year end was 116.

The continued increase in children who are recorded as Looked After in Monmouthshire rose to a year end of 173.

Children's Services continues to work with partners to respond to children at risk of sexual exploitation. During this period 17 children were subject to Child Sexual Exploitation Strategy Meetings and 7 made subject to Operation Quartz (45 meetings).

76.79% (down from 84.73%) of Adult Protection enquires were completed within 7 days.

Practitioners in adult and children's services work with multi-agency partners in domestic abuse. Between Sept 2018 –March 2019 25 women, and 31 children in Monmouthshire were the subject of Multi Agency Risk Assessment Conference (MARAC) risk reduction plans.

### Analysis

Overall ensuring robust protection for people at risk of harm is a strength within the Council. There is a comprehensive range of mechanisms across children and adult services that allow for a robust approach to quality assurance.

These include:

- Managers monitor through live dashboards in Children's Services with weekly workforce meetings to check case-loads
- Weekly Performance Management Oversight Group in Children's Services using an RBA approach
- Children's Services Leadership Team receive 6-monthly reports from the Independent Reviewing Officer and Child Protection Co-ordinator
- Cases are reviewed regularly within the court process
- Front-line supervision is embedded
- DMT receives regular performance updates from service areas
- Adult Social Services practice improvement meetings are held regularly

Never-the-less, the continued upward trend in numbers within both children's and adults services puts services under pressure, and the current static score line at 4 reflects this.

A Review of Adult Safeguarding team performance and structure has demonstrated the significant increase in safeguarding concerns being referred to the department and an increased Safeguarding function with the demands of the Gwent Adult Safeguarding Board, and Corporate Safeguarding. This has impacted the timescales in which the safeguarding process can be completed and has led to recommendations in relation to structure, capacity and workload in order to meet current demand and prepare for the Wales Adult Safeguarding Procedures to be launched in Nov 2019.

Similarly, over the next 12 months children services will be looking at practice approaches around risk and strengths based working to support the practitioners to manage and report risk more effectively in order to protect but also work in partnership with children and families.

Both the introduction of the new All Wales Child and Adult Protection Procedures which launch in November, together with the services preparation for the change to WCCIS present a current a significant challenge to service stability. There are plans in place to ensure smooth implementation of both.

### Key Next Steps for 2019 - 2020

Ensure that plans are in place to implement new procedures and WCCIS without unnecessary disruption to operational issues / quality assurance processes

Consider capacity issues specifically for adult protection

Deliver risk assessment and strengths based practice across Children's Services

**5). Safe Services – delivered through commissioning arrangements, grants, partnerships and volunteering**

**SELF-ASSESSED SCORE = 3**

**What does good look like?**

We use our influence to ensure that services operating in Monmouthshire, both commissioned and those outside the direct control of the Council, do so in ways which promote the welfare and safety of children and adults at risk.

**Progress and Evidence**

The Corporate Safeguarding Policy has been updated to include the agreed Framework for Minimum Standards for Safeguarding Across Commissioned Services

Social Care and Health have completed Matrix for Minimum Standards and other directorate areas are to follow. This indicated that safe commissioning practice was complied with. The Internal Audit Report into commissioning of external placements (within children's services) published in June 2019 provided reasonable assurance that proper controls were in place.

There are well developed arrangements in public protection to ensure safeguarding is given due regard:

- safeguarding training is a requirement for licenced taxi /hackney and private hire.
- voluntary safeguarding training is offered to alcohol/ entertainment and late night refreshment licensees.

Monmouthshire Letting and Hiring process requires evidence of the hirer's Safeguarding processes as mandatory prior to letting council property. This is set out in the Taxi and Private Hire Policy & Conditions 2016.

During the reporting period we saw:

- 100% compliance new licences
- 100% previous licences
- 100% renewed licence

The Corporate Safeguarding Policy and Volunteering Policy set out clear guidelines and expectations for volunteers in commissioned services. This is reflected in individual service contracts.

**Analysis**

Progress has been made within Social Care and Health in respect of having clear operating process in place to ensure a robust approach for all social care commissioning for children and adults. A Commissioning Lead is in place and productive relationships

with commissioned providers have been established allowing any emerging concerns to be addressed through good partnership working. There has also been an improvement in statutory social work visits being undertaken (within Children's Services) and the review of placements within statutory timescales remains strong. This means that within social care there is a robust, risk-based, contract management and quality assurance process across all providers. This was recognised within the follow up review of external placements (children's services) by Internal Audit.

Initial review of the evidence from schools, and other parts of the Council for children/ adults at risk indicate there are robust arrangements in place for contracted services (including individual school contracts, transport, leisure services).

However, the evaluative score remains at 3 because of the need to complete the commissioning matrix for each directorate. This will provide a greater understanding and increased assurance of the baseline position across the Council in respect of commissioning. Commissioning has been agreed as a future area of focus for Internal Audit.

#### **Key Next Steps for 2019 - 2020**

All directorates to complete the Minimum Standards Self-Assessment Matrix, and evaluate outcomes.

## **Appendix 3**

### **Safeguarding Key Actions for 2019 – 2020**

<b>Action</b>	<b>Responsibility</b>	<b>Timeframe</b>
Complete the SAFE process and evaluate learning and outcomes for future planning	All directorate leads Chair of WASG	March 2020
Ensure that there is good awareness across the Council of the new All Wales Child and Adult Protection Procedures	Safeguarding Service Manager	March 2020
Collate training data from the outcomes of the SAFEs and revise the training plan accordingly	Safeguarding Service Manager	March 2020
Implement the upgrade of the HR data base and provide oversight from a safeguarding perspective	Head of Human Resources	March 2020
Support the on-going development of integrated approaches to exploitation through the MASE work	Safeguarding Service Manager	March 2020
Ensure full roll-out of the Modern Day Slavery protocol	Safeguarding Service Manager Head of Public Protection	March 2020
Review the initial outcomes from the Early Help Panel	Head of Children's Services	Jan 2020
WASG to retain oversight of the implementation of the Transport Programme board from a safeguarding perspective.	Chair of WASG Safeguarding Service Manager	March 2020
Ensure that plans are in place to implement new All Wales Procedures and WCCIS without unnecessary disruption to operational issues / quality assurance processes	Head of Children's and Adult's Services	Jan 2020
Consider capacity issues, specifically for adult protection	Chief Officer Health and Social Care	Jan 2020
Deliver risk assessment and strengths based practice across Children's Services	Head of Children's Services	Jan 2020
All directorates to complete the Minimum Standards Self-Assessment Matrix, and evaluate outcomes.	All directorate leads Chair of WASG	March 2020



## **Appendix 4**



Corporate  
Safeguarding Policy

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