Corporate Safeguarding Arrangements Follow-up Report – Blaenau Gwent County Borough Council

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Contents

Summary report

Our audit duties

1 We carried out this audit under the duties contained within section 17 of the Public Audit (Wales) Act 2004 (the 2004 Act).

What we reviewed and why

2 Having robust corporate safeguarding arrangements can provide a Council with assurance that all employees, elected members, volunteers, school governors and contractors have a role in safeguarding and promote the wellbeing of children and adults who may be at risk of harm.

3 In 2014, we undertook a review on the Council's arrangements to support the safeguarding of children and we made three proposals for improvement.

4 In 2015, the Auditor General for Wales published a national report following a review of corporate safeguarding arrangements in Welsh councils[1]. That report made eight recommendations, of which seven related directly to councils and one related to the Welsh Government.

5 In 2019, we assessed how the Council had addressed the proposals for improvements and recommendations in our 2014 and 2015 reports[2]. We found that the Council had made limited progress, and safeguarding arrangements were not consistent enough to provide assurance across all service areas. We found that the Council had not fully addressed eight of the ten national recommendations and local proposals for improvement.

6 In 2022, we completed a further review[3] to assess the Council's progress in addressing the outstanding recommendations and proposals for improvement. We concluded that the pandemic further delayed the Council's progress in addressing the recommendations, although it had taken recent action to strengthen its corporate safeguarding arrangements. However, the Council had not fully addressed our previous recommendations, and we issued two further recommendations.

7 This review sought assurance that the Council has made effective progress since 2022 in addressing the outstanding recommendations. As a result, our work only focussed on aspects of corporate safeguarding arrangements covered by those recommendations. We did **not** review:

[1] Audit Wales, Review of Corporate Safeguarding Arrangements in Welsh Councils, July 2015

[2] Audit Wales, Blaenau Gwent County Borough Council – Follow-up review of Corporate Arrangements for the Safeguarding of Children, October 2019

[3] Audit Wales, Corporate Safeguarding Follow-up – Blaenau Gwent County Borough Council, November 2022

- all aspects of the Council’s corporate safeguarding arrangements;
- specific safeguarding arrangements in Education or Social Services;
- specific arrangements for safeguarding referrals; or
- outcomes of safeguarding referrals.

8 We undertook the review in November 2024.

Our audit methods

9 The Council completed a self-assessment of its progress in addressing the outstanding recommendations and provided supporting documents. We reviewed the documents and self-assessment, and interviewed key officers and elected members. We also observed a scrutiny committee meeting where corporate safeguarding performance was an agenda item. The evidence we have used to inform our findings is limited to these sources.

What we found

10 Overall, we found that **the Council has not made sufficient progress to address the outstanding corporate safeguarding recommendations**. We set out below why we reached this conclusion.

11 The Council has not fully addressed any of the outstanding corporate safeguarding recommendations. As a result, we are unable to gain assurance that the Council has proper arrangements for all aspects of corporate safeguarding.

12 The Council has not:

- updated its Corporate Safeguarding Policy.
- completed the exercise to identify the Designated Safeguarding Persons (DSPs) for each directorate.
- improved its performance reporting for corporate safeguarding.
- developed corporate arrangements to ensure third parties delivering services on behalf of the Council comply with safeguarding policies. We acknowledge the Council’s Contract Procedure Rules now reference corporate safeguarding, but the Council continues to lack oversight.
- developed a rolling programme of internal audit reviews to undertake systems testing and compliance on the Council’s safeguarding practices. We note that Internal Audit completed three safeguarding reviews in 2023, with two reviews receiving an audit opinion of Limited Assurance, however, it is unclear when these are scheduled for a follow-up review.

13 We acknowledge the Council has made some progress, albeit it not enough to address the recommendations in full.

14 The Council recognises the risks associated with corporate safeguarding. The Council has updated its Corporate Risk Register to include corporate safeguarding

– 'Failure to ensure adequate safeguarding arrangements are in place for vulnerable people in Blaenau Gwent.' The Council assesses this risk as high due to its potential impact and will continue to monitor through the Corporate Risk Register.

15 The Council is improving its arrangements to gain assurance that all volunteers (where applicable) have a DBS check. The Council now has a system for recording volunteer DBS checks, but this is a manual system. Therefore, the system can be exposed to human data input error, and it is time-consuming to update and monitor. The Council intends to improve this arrangement by recording volunteer DBS checks on the Council's iTrent system in 2025. This should provide the Council with more accurate and up-to-date information to gain assurance that all relevant volunteers have a DBS check.

16 The Council has a Corporate Safeguarding Training Framework which clearly sets out the type of training required, when it is required and the frequency. The Council uses an Excel spreadsheet to record compliance levels. This arrangement is similar to the recording system for volunteer DBS checks, with similar risks with data input, timeliness, and monitoring. The Council intends to strengthen its recording and monitoring of mandated training by introducing Thinqi (a Learning Management system) in 2025. It is intended that Thinqi will log safeguarding training records for staff, elected members and schools, including governors. The Council does not, however, have mandated training for contractors and third parties, and timescales for this and the content and recording of this training have not been finalised.

17 One notable improvement in the Council's arrangements was the introduction in 2022 of annual corporate safeguarding self-assessments. Each head of service must complete a self-assessment. The completed self-assessments provide the Council with an overview of safeguarding practices across all services and aid monitoring and the identification of future areas of focus. We found that the self-assessment process also promotes a greater understanding that corporate safeguarding is the responsibility of all services and not just the Education Service and Social Services. However, the Council has not produced a self-assessment for third parties.

18 The Council is strengthening its oversight arrangements of corporate safeguarding. Following our 2015 review, the Council set up a Corporate Safeguarding Leads Group, but it did not have the seniority of Council representation to influence change. In 2024, the Council disbanded this group and formed a Corporate Safeguarding Board. This Board, containing heads of service, met for the first time in October 2024. Supporting the Board at an operational level, the Council plans to introduce a Designated Safeguarding Persons Group. At the time of our fieldwork, these arrangements were in their infancy, so we are unable to comment on their effectiveness.

19 Overall, it is disappointing that ten years after issuing our first safeguarding report, the Council has still not fully addressed its recommendations. Although there has

been some recent activity to strengthen the Council's arrangements, we note this progress with caution. In our 2022 report, we also noted the Council's action to strengthen its corporate safeguarding arrangements just prior to that review, but the Council did not follow through and complete all the necessary actions after we issued that report. If we are to gain assurance that the Council is committed to strengthening its corporate safeguarding arrangements, the Council must continue to deliver on its actions after the publication of this report.

20 We will continue to track the Council's progress in addressing each of the outstanding recommendations through other audit activity. Elected members can also play an active role in seeking assurance that the Council is improving its corporate safeguarding arrangements in a timely way. However, the Council does not have effective arrangements for members to oversee and scrutinise the Council's progress in addressing external regulator recommendations. While members of the Governance and Audit Committee and/or the relevant scrutiny committee may receive our initial reports, these committees do not routinely receive progress reports on how the Council is addressing recommendations. This limits members' ability to scrutinise and challenge progress and hold those responsible to account.

Appendix 1

Recommendations and proposals for improvement in our 2014, 2015 and 2019 reviews of corporate safeguarding arrangements

Exhibit 1: Outstanding recommendations and proposals for improvement from our 2014, 2015, and 2019 reports

Recommendations
R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through: • regularly disseminating and updating information on these appointments to all staff and stakeholders. Our 2019 report suggests that in addressing this recommendation, the Council should also look to: • ensure that it communicates the names and roles of lead officers and members for corporate safeguarding to all staff, volunteers, agency workers and contractors when the Corporate Safeguarding policy is revised to reflect the new senior management restructure; • ensure the new designated strategic safeguarding leads and the deputy leads are fully briefed on their safeguarding roles and responsibilities; • strengthen the governance arrangements supporting the deputy designated strategic safeguarding leads' network; • ensure that the Corporate Safeguarding Policy is easily accessible from the main Council website; • ensure that contractors receive the corporate safeguarding policy prior to commencing work at the Council to fully understand the corporate safeguarding roles and responsibilities and procedures; and • test employees' awareness of the safeguarding policy and procedures, and confidence to use the policy (for example, through a staff survey).

Recommendations

R3 Strengthen safe recruitment of staff and volunteers by:

- 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.

Our 2019 report suggests that in addressing this recommendation the Council should also look to:

- ensure that its monitoring systems enable tracking of safe recruitment and DBS renewal processes for agency staff, volunteers and contractors; and
- strengthen arrangements for monitoring that services commissioned by the Council undertake safe recruitment practices.

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

- 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.

Our 2019 report suggests that in addressing this recommendation, the Council should also look to:

- include the Corporate Safeguarding Policy, safeguarding roles and responsibilities and safeguarding training in the corporate induction programme;
- ensure consistent recording of all staff safeguarding training to enable refresher training to be undertaken in a timely manner; and
- agree a minimum timescale within which staff, volunteers and contractors undertake basic initial training upon appointment.

Recommendations
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: • benchmarking and comparisons with others; • 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. Our 2019 report suggests that in addressing this recommendation the Council should also look to: • ensure safeguarding reports include performance information, DBS compliance and attendance levels at safeguarding training; and • ensure the reporting of safeguarding issues and risks across all Council directorates, partners, volunteers and third parties delivering services on behalf of the Council.
PFI 2 Strengthen performance and risk management by regularly reporting conclusions from all department safeguarding activity to relevant forums to strengthen oversight and scrutiny. [Links to R6]

Recommendations

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

Our 2019 report suggests that in addressing this recommendation the Council should also look to:

- clarify the role of Internal Audit and Audit Committee in relation to assuring the effective operation and governance of Corporate Safeguarding arrangements, including within the Corporate Safeguarding Policy; and
- ensure that relevant information and insight from Internal Audit's programme of work are shared and feed into the Council's oversight and assurance framework for safeguarding including with the Corporate Safeguarding Board.

PFI 3

Include safeguarding within the internal audit programme to strengthen accountability and challenge. [Links to R7]

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.

Our 2019 report suggests that in addressing this recommendation, the Council should also look to:

- consider safeguarding risks in services other than Social Services and Education.

Appendix 2

Recommendations in our 2022 Follow-up Review of Corporate Arrangements for the Safeguarding of Children

Exhibit 2: Recommendations included in the 2022 report

Recommendations	
R1	The Council needs to take further action to fully comply with the recommendations in our October 2019 follow-up report on corporate arrangements for safeguarding of children.
R2	The Council needs to strengthen its monitoring arrangements of third parties so it can assure itself that they comply with the Council's safeguarding policies. It should consider whether a self-assessment tool like that recently used by Council directorates can be used with third parties to better understand compliance.

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Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.