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Auditor General for Wales

# Follow-up review of corporate arrangements for the safeguarding of children – **Cardiff Council**

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This document is also available in Welsh.

The team who delivered the work comprised Ian Phillips and Sara-Jane Byrne 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 effective corporate arrangements in place for safeguarding children. We considered the findings of our 2014 report into the Council's arrangements to support safeguarding of children<sup>1</sup>. 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)<sup>2</sup>.
- 2 We undertook the review during April 2019.

### What we found

- 3 Our review sought to answer the question: Has the Council acted upon the recommendations and proposals for improvement contained in the national and local reports of the Auditor General published in 2014 and 2015?
- 4 Overall we found that: The Council has been slow to implement a number of our previous recommendations and proposals for improvement, but has made progress in recent months. We have identified some further proposals for improvement to strengthen aspects of the Council's safeguarding arrangements.

### Proposals for improvement

#### Exhibit 1: proposals for improvement

The table below sets out the proposals for improvement that we have identified following this review.

Proposals for improvement	
P1	<p>The Council should improve its approach to safeguarding training in the following ways:</p> <ul style="list-style-type: none"><li>• Get staff through mandatory safeguarding training more quickly and take forward the work identified by the Corporate Safeguarding Board to collate a percentage breakdown of safeguarding training compliance within each Council Directorate;</li></ul>

<sup>1</sup> Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Cardiff Council**, October 2014

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

## Proposals for improvement

- Ensure it centrally collates safeguarding training records for those staff and volunteers who have had face to face safeguarding training as well as the e-learning safeguarding training;
- Clarify when mandatory safeguarding training for staff and members needs to be refreshed;
- Consider ways in which it could extend its safeguarding training offer, for example building on the planned Child Sexual Exploitation awareness training to be given to taxi drivers, and to provide safeguarding training to (for example) those working in the night time economy;
- Accelerate the mandatory completion of Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) training.

P2 The Council's corporate safeguarding intranet pages could be strengthened by providing:

- a link to the Corporate Safeguarding Policy;
- information on the lead officer for corporate safeguarding, the lead member for corporate safeguarding and the Corporate Safeguarding Board; and
- information on where to report concerns or to find out further information.

P3 The Council should strengthen its Recruitment and Selection Policy in relation to safeguarding and safe recruitment.

P4 The Council should strengthen its safeguarding contractual provisions by being more explicit about its safeguarding training requirements.

P5 The Council should ensure it is able to record and monitor volunteer information centrally, including any training records and Disclosure and Barring Service checks for volunteers.

# Summary report

## Assessment of progress against the recommendations from our 2015 report

The Council has been slow to implement a number of our previous recommendations and proposals for improvement, but has made progress in recent months. We have identified some further proposals for improvement to strengthen aspects of the Council's safeguarding arrangements

Exhibit 2: proposals for improvement from the 2015 report to strengthen aspects of the Council's safeguarding arrangements

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
R1 Improve corporate leadership and comply with the Welsh Government policy on safeguarding through:	
<ul style="list-style-type: none"><li>the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements;</li></ul>	Met: The Director of Social Services fulfils this role.
<ul style="list-style-type: none"><li>the appointment of a lead member for safeguarding;</li></ul>	Met: The Cabinet Member for Finance, Modernisation and Performance has Corporate Safeguarding within his portfolio.

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<ul style="list-style-type: none"> <li>regularly disseminating and updating information on these appointments to all staff and stakeholders.</li> </ul>	<p>Partially met – an area for improvement identified.</p> <p>The Council's Corporate Safeguarding Policy provides information about the roles of the senior lead officer and lead member for corporate safeguarding. The Council has confirmed that they provide information about these roles via training and staff updates on the Council's intranet.</p> <p>In line with the revision of the Corporate Safeguarding Policy, the Council have begun to issue regular safeguarding bulletins to staff.</p> <p>The Council's corporate safeguarding intranet pages could be strengthened as set out in P2 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>Met:</p> <p>The Council revised its Corporate Safeguarding Policy in January 2019. It is a comprehensive document that provides clear strategic direction and clear lines of accountability across the Council.</p>
<p>R3 Strengthen safe recruitment of staff and volunteers by:</p>	
<ul style="list-style-type: none"> <li>ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;</li> </ul>	<p>Partially met – an area for improvement identified.</p> <ul style="list-style-type: none"> <li>The Council has a DBS Policy that is clear on respective responsibilities, although it is overdue a review (the date for review is May 2016). The Council acknowledge the need to review this policy.</li> <li>The Council has a Recruitment and Selection Policy that is also overdue a review (the date for review is November 2016). The Council recognise the need to update this policy and have stated that the policy is currently under review in line with safe recruitment changes. The Council's view is that its corporate recruitment process covers many items under safer recruitment. We do not disagree with that viewpoint, but we believe that</li> </ul>

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>safeguarding matters should feature more prominently in the Recruitment and Selection Policy.</p> <ul style="list-style-type: none"> <li>• The Council's Corporate Safeguarding Policy refers to a Safe Recruitment Policy but this policy does not exist.</li> <li>• The Council has recognised an existing weakness in its arrangements in that it has not had a Volunteering Policy. However, one has been drafted and is due to be published shortly.</li> </ul>
<ul style="list-style-type: none"> <li>• creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and</li> </ul>	<p>Partially met – an area for improvement identified.</p> <ul style="list-style-type: none"> <li>• There is no central system for volunteers but the forthcoming Volunteering Policy is intended to rectify that and the Council should maintain its focus in this regard.</li> <li>• The Council stores information to record and monitor compliance levels on DBS checks in respect of corporate employees on DigiGOV. However, it holds other employees' information on the SAP system and is currently transferring that information to DigiGOV. It expects to complete that exercise in the next two or three months.</li> </ul>
<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>Met, but with further work ongoing:</p> <ul style="list-style-type: none"> <li>• The revised Corporate Safeguarding Policy sets out that the Council will ensure that safe recruitment standards are applied and monitored within the contractual arrangements in services that are commissioned by the Council or through support grants.</li> <li>• The Council has provided examples of contracts that contain clauses in respect of DBS checks, including volunteers whom the contractor may engage.</li> <li>• The Council recognises that there is work still to do in this area, particularly in non Social Services Directorates. The Council's Resources, Commissioning and Procurement service is working to</li> </ul>



Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	strengthen safeguarding clauses that are included in tender documentation and contracts.
R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:	
<ul style="list-style-type: none"> <li>ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;</li> </ul>	<p>Met, but some areas for improvement identified.</p> <ul style="list-style-type: none"> <li>Safeguarding training is mandatory for all staff (either via e-learning or face to face training) and the Council expects this training to be completed within the first three months of employment.</li> <li>There have been discussions within the Council that the mandatory safeguarding training should be refreshed every three years. However, no decision has yet been taken on this and the Council needs to clarify when mandatory safeguarding training for staff and members needs to be refreshed.</li> <li>As at March 2019, the Council provided us with a figure of 3818 out of 6227 members of staff who had completed the e-learning mandatory safeguarding training. This is just over 61%. The Council should accelerate the rate of compliance with the completion of its mandatory safeguarding training. The Corporate Safeguarding Board progress report of January 2019 has identified that further work is required in order to gather a percentage breakdown of all staff within departments who have successfully completed the training. The Council has not provided figures that we requested for staff who have had face to face safeguarding training.</li> <li>Shared Regulatory Services (SRS) has plans to run more bespoke safeguarding related training events. The SRS will be undertaking a programme of training and awareness of Child Sexual Exploitation within the taxi community and will train SRS officers to recognise exploitation,</li> </ul>

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>slavery or trafficking during the course of their work. However, the Council should consider further ways in which it could extend its safeguarding training offer, building on these proposals. For example, consider providing safeguarding training to those working in the night time economy.</p> <ul style="list-style-type: none"> <li>• To date, safeguarding training for members has not been mandatory, and take up of the previous round of safeguarding training in 2017 was poor with only 15 members attending. However, in January 2019 the Democratic Services Committee confirmed that safeguarding training is to be mandatory for members going forward and it is proposed that members will receive that training by July 2019.</li> <li>• The elected member role description has recently been updated to include information in respect of safeguarding and about members being a corporate parent.</li> <li>• It is a Welsh Government requirement that training in respect of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV) is mandatory for all staff, but currently only 54% of staff have completed it. See PFI 1.</li> </ul>
<ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>Partially met:</p> <ul style="list-style-type: none"> <li>• With regard to staff in Council departments, the mandatory safeguarding training is an e-learning module that is hosted and monitored by the Council's academy training resources.</li> <li>• Any staff who are unable to access the e-learning should have face to face training but the Council is not collating such training completion figures centrally;</li> <li>• With regard to elected members, as set out above, safeguarding training has only recently become mandatory, but members are able to access the e-learning training. Face to face training will be offered to members</li> </ul>

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>on request and records of that will be held by the Member Services Team.</p> <ul style="list-style-type: none"> <li>• Schools' staff have access to the e-learning training. There is also more advanced training available. There is a Level 2 'Basic awareness presentation' that is delivered annually in schools by the Child Protection Lead in each school. Schools currently hold those records but from September 2019 the Council will store those records centrally to ensure compliance. There is also Level 3 'Designated Senior Person' training and these training records are held centrally.</li> <li>• Governor training is not mandated at a national level, however the Council is proactive with regard to governor training and provides three central safeguarding training sessions a year for school governors. This training is delivered by the Education Safeguarding Team (EST). Governor training for the 2019-20 academic year will have three levels; Level 1 is 'School context' delivered by the Head teacher or Designated Senior Person, Level 2 is a 'Basic Awareness Presentation' delivered by the EST for Chairs of Governors and Child Protection Leads and Level 3 is 'Part IV Process Training' delivered for Chairs of Governors. Any safeguarding training delivered by the EST is logged by Governor Services.</li> <li>• The draft Volunteering Policy states that volunteers will be required to carry out the safeguarding e-learning training or face to face training. The e-learning is on the 'Academy' system and so will be captured centrally. The Council has not clarified its current arrangements for safeguarding training for volunteers or where records of such training are held.</li> </ul>

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Not met – an area for improvement identified.</p> <p>The Council's contractual provisions in respect of safeguarding do not include specifying what safeguarding training is required.</p>
<p>R6<sup>3</sup> 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"> <li>benchmarking and comparisons with others;</li> <li>conclusions of internal and external audit/inspection reviews;</li> <li>service-based performance data;</li> <li>key personnel data such as safeguarding training, and DBS recruitment checks;</li> <li>the performance of contractors and commissioned services on compliance with council safeguarding responsibilities.</li> </ul>	<p>Partially met:</p> <ul style="list-style-type: none"> <li>It is only recently that the Council has made progress in implementing this recommendation.</li> <li>With effect from the first quarter of 2019-20, there is to be a corporate safeguarding performance framework, with corporate safeguarding performance measures, that will be reported to the Corporate Safeguarding Board and, potentially, scrutiny. The framework will enable consideration of service-based performance data and of personnel data, such as safeguarding training compliance and safe recruitment compliance.</li> <li>In January 2019, a Corporate Safeguarding Board progress report went to two scrutiny committees and to Cabinet and, going forward, there will be a report at least annually. Prior to this, there was only one corporate safeguarding annual report in 2015-16; such reports were difficult to produce as relevant information was not readily available from Directorates.</li> <li>The Corporate Safeguarding Board progress report included consideration of progress against our previous recommendations.</li> </ul>

<sup>3</sup> Welsh Government were responsible for responding to recommendation 5 so that is not included above

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	<ul style="list-style-type: none"> <li>• The January 2019 Internal Audit report on corporate safeguarding was reported to Senior Management Team and the Social Services Quality and Performance meeting.</li> <li>• Scrutiny has carried out some safeguarding related Task and Finish inquiries on topics such as Child Sexual Exploitation and Human Trafficking.</li> <li>• Within Social Services, contract monitoring includes the performance of contractors and commissioned services on compliance with Council safeguarding responsibilities, but, to date, this has not been the case across other Directorates. The new corporate safeguarding performance framework should help to improve arrangements in that there will be measures to identify the 'number of safeguarding issues raised with licensed/commissioned/partnership service' and a 'qualitative report on resolution of safeguarding issues'.</li> </ul>
<p>R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p>	<p>Partially met:</p> <ul style="list-style-type: none"> <li>• The Council has been slow to respond to this recommendation from a corporate-wide perspective. Until recently Internal Audit has not undertaken any reviews on the Council's corporate safeguarding arrangements. However, Internal Audit published a report on the Council's corporate safeguarding arrangements in January 2019 and will be doing a follow-up of that review in 2019-20. An Internal Audit review of recruitment is also planned for 2019-20.</li> <li>• Internal Audit has undertaken testing of compliance and controls in respect of safeguarding in high risk areas within the Social Services and Education and Lifelong Learning directorates. A representative from Internal Audit used to attend the Corporate Safeguarding Board meetings. Whilst this is no longer the case, Internal Audit can request the agendas and minutes of the Corporate Safeguarding Board meetings</li> </ul>

Recommendations from the 2015 report	Wales Audit Office assessment of Council's progress
	and we understand Internal Audit reviewed these papers as part of its corporate safeguarding audit.
<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>Partially met:</p> <ul style="list-style-type: none"> <li>• Although safeguarding is a risk on the Corporate Risk Register, the Council has been slow to respond to this recommendation at a service level outside of the Social Services Directorate.</li> <li>• Social Services has a SBAR (Situation, Background, Analysis, Recommendation) model to help identify risks, and the Council intends to implement a similar system across all Directorates from 2019-20.</li> <li>• Directorates other than Social Services do not have safeguarding as a Directorate level risk, including Education.</li> <li>• The revised Corporate Safeguarding Policy has introduced a new self-evaluation process, which should help Directorates to identify safeguarding risk areas.</li> <li>• From April 2019 safeguarding, will be included in all Directorate's senior management assurance statements.</li> <li>• The new corporate safeguarding performance framework has a performance measure of 'Number of safeguarding risks identified in directorate risk register' and this should help to give the Corporate Safeguarding Board better oversight of Directorate level safeguarding risks. The Corporate Safeguarding Board intends to establish and maintain a safeguarding risk register.</li> </ul>

## Assessment of progress against the proposals for improvement from our 2014 report

Exhibit 3: proposals for improvement in our 2014 local report issued to the Council in October 2014

Proposals for improvement in our 2014 local report issued to the Council in October 2014	Wales Audit Office assessment of Council's progress
P1 Ensure the Council develops effective arrangements to monitor, evaluate and challenge information and performance of safeguarding.	See narrative against recommendation 6 above.
P2 The Council should clarify who designated officers with responsibility for safeguarding are.	<p>Met:</p> <ul style="list-style-type: none"> <li>• The Council has established a Designated Safeguarding Leads Group which met for the first time in November 2018. This comprises all officers at Operational Manager level and the role of the Designated Safeguarding Lead Officers is to lead on safeguarding matters in their service areas.</li> <li>• The Corporate Safeguarding Policy sets out that there are Directorate Safeguarding Lead Officers to act as an overarching source of safeguarding advice and support for staff in their service areas.</li> <li>• The Local Authority Designated Officer is the service manager for safeguarding.</li> </ul>
P3 Improve the range, quality and coverage of safeguarding performance reporting to provide adequate assurance that corporate arrangements are working effectively.	See narrative against recommendation 6 above.

<b>Proposals for improvement in our 2014 local report issued to the Council in October 2014</b>	<b>Wales Audit Office assessment of Council's progress</b>
P4 Improve the work of the Council's scrutiny committees to ensure it is providing assurance on the effectiveness of the Council's corporate safeguarding arrangements.	See narrative against recommendation 6 above.
P5 Ensure all elected members and staff who encounter children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding.	See narrative against recommendation 5 above.
P6 Identify and agree an appropriate internal audit programme of work for safeguarding across the Council.	See narrative against recommendation 7 above.





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