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Auditor General for Wales

Follow-up review of Corporate Arrangements for the Safeguarding of Children – **Blaenau Gwent County Borough Council**

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This document is also available in Welsh.

The team who delivered the work comprised Dave Wilson 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 We undertook this review to seek assurance that the Council has acted upon our previous national recommendations and local proposals for improvements for corporate arrangements for safeguarding children. We considered the findings of our 2014 report into the Council's arrangements to support safeguarding of children¹. We also considered the Council's progress in implementing the recommendations contained in the Auditor General's report, **Review of Corporate Safeguarding Arrangements in Welsh Councils** (July 2015)².
- 2 We undertook the review during June 2019. The Council completed a self-assessment of its progress in addressing the recommendations and proposals for improvement we made in 2014 and 2015. The Council provided documents to support its self-assessment. We then interviewed key officers and the lead member for corporate safeguarding.
- 3 We have not tested the effectiveness of the Council's safeguarding arrangements in practice as part of this review.

What we found

- 4 Our review sought to answer the question: **Can the Council provide assurance that it has addressed the recommendations and proposals for improvement contained in the Auditor General's national and local reports published in 2014-15?**
- 5 Overall, we found that: **the Council has made limited progress in addressing our previous recommendations and proposals for improvement and safeguarding arrangements are not consistent enough to provide assurance across all service areas.**
- 6 Based on our review, we have concerns about the Council's corporate arrangements for safeguarding children across all of its directorates and by third parties and stakeholders delivering services on behalf of the Council. The Council does not currently include safeguarding in its corporate risk register. The information in the Council's self-assessment and in documentary evidence provided to us is limited in that it focusses on safeguarding arrangements for its education and social services directorates. The Council needs to urgently strengthen oversight and assurance of corporate safeguarding arrangements

¹ Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Blaenau Gwent County Borough Council**, October 2014

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

across all directorates, and particularly for services delivered by third parties and stakeholders.

7 The Council's Executive's commitment to safeguarding is stated in its Corporate Plan where it states that it aims 'to put effective safeguarding arrangements in place to protect people from harm'. However, it has yet to fully address most of our previous proposals for improvement and national recommendations as set out in **Exhibit 1**. **Exhibit 2** sets out our assessment of the Council's progress in implementing each national recommendation and local proposal for improvement.

Exhibit 1: national recommendations and proposals for improvement that have yet to be fully addressed

National recommendations and proposals for improvement that have yet to be fully addressed	
PFI2	Strengthen performance and risk management by regularly reporting conclusions from all department safeguarding activity to relevant forums to strengthen oversight and scrutiny.
PFI3	Include safeguarding within the internal audit programme to strengthen accountability and challenge.
R1	<p>Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ul style="list-style-type: none"> the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; the appointment of a lead member for safeguarding; and regularly disseminating and updating information on these appointments to all staff and stakeholders.
R3	<p>Strengthen safe recruitment of staff and volunteers by:</p> <ul style="list-style-type: none"> ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children; creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement.

National recommendations and proposals for improvement that have yet to be fully addressed

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.

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;
- conclusions of internal and external audit/inspection reviews;
- service-based performance data;
- key personnel data such as safeguarding training, and DBS recruitment checks; and
- the performance of contractors and commissioned services on compliance with council safeguarding responsibilities.

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

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.

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

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

The table below sets our assessment of the Council's progress in addressing the national recommendations from our 2015 report and local proposals for improvement from our 2014 report.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ol style="list-style-type: none"> 1. the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; 2. the appointment of a lead member for safeguarding; and 3. regularly disseminating and updating information on these appointments to all staff and stakeholders. 	<p>Summary – Partially Met</p> <p>The Council has appointed a senior lead officer. The Managing Director is ultimately accountable for ensuring the safeguarding of children is effective. The Director of Social Services is the designated safeguarding lead and oversees and reports to members and the Managing Director on the operation, monitoring and improvement of safeguarding systems.</p> <p>The Council has appointed a lead member for safeguarding.</p> <p>It is clear that the Council disseminates and makes information about these appointments accessible to staff but it is unclear to what extent it disseminates this information to its stakeholders to keep them informed.</p> <p>Safeguarding responsibilities and a link to the Corporate Safeguarding Policy have been included in the Managing Director's message sent to all staff.</p>

The Corporate Safeguarding Policy is available on the Council's website, but is not easy to locate. The Policy is available by clicking on the 'Resident' section and then 'Health, Social Care and Well-being' and finally the 'Safeguarding' section. In July 2019, the regional Children and Adult Safeguarding Boards launched their new website www.gwentsafeguarding.org.uk. There is a direct link to this website from the 'safeguarding' section on the Council's website.

There are 'safeguarding' sections on the Council's intranet, as are both a Children's Services and Adult Services learning resource, but not a corporate learning resource.

In June 2019, the Council completed a senior management re-structure. This restructure will result in a change of designated strategic safeguarding leads and deputy leads. The Council plans to revise the Corporate Safeguarding Policy shortly to reflect these changes.

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

- while contracts outline safeguarding responsibilities, contractors do not receive the corporate safeguarding policy. Contractors are therefore unlikely to know who the lead safeguarding officers are or the Corporate procedures for reporting any safeguarding concerns.
- each directorate has a safeguarding lead and deputy safeguarding lead. Safeguarding issues are discussed at and information disseminated via the deputy designated strategic safeguarding leads' network, there are no terms of reference that clearly articulate the purpose and objectives of this network. In addition, regular safeguarding leads' network meetings did not take place for an extended period due to the long-term sickness absence of the network Chair. While regular network meetings have recently been reinstated following the appointment of a new Chair, the governance arrangements of this network need strengthening to ensure that it is not reliant on one individual and also to ensure the network has a clear purpose.

The Council has further work to do to fully address this national recommendation.

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;

	<ul style="list-style-type: none">• 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).
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National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>Local Proposal for Improvement 1</p> <p>Confirm the Council's designated Officer for Safeguarding</p>	<p>See narrative above</p>
<p>R2 Ensure there is a corporate-wide policy on safeguarding covering all council services to provide a clear strategic direction and clear lines of accountability across the Council.</p>	<p>Summary – Fully met</p> <p>The Council has a Safeguarding Policy for children and vulnerable adults that covers all Council service areas and applies to all elected members, employees, volunteers and contractors.</p> <p>The Council's approach is that 'safeguarding children (and adults) from abuse is everybody's business and there is a shared responsibility, both corporately and individually to ensure all children (and adults) are treated with respect and protected from others who may abuse them'.</p> <p>Each Directorate is responsible for nominating a Designated Strategic Safeguarding Lead plus a Deputy Safeguarding Lead. The Corporate Safeguarding Policy outlines the roles and responsibilities of strategic safeguarding leads and deputy safeguarding leads.</p> <p>The Council approved the current Safeguarding Policy in January 2018, and the policy is subject to a review every three years. Due to the recent senior management restructure, we were informed the policy will be reviewed shortly to reflect changes to strategic safeguarding leads and deputy leads.</p> <p>The Corporate Safeguarding Policy provides good reference to possible signs and symptoms of neglect, physical abuse, sexual abuse, emotional and psychological abuse, domestic abuse of children and adults, child sexual exploitation and financial abuse of adults.</p>

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>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>The Council's Corporate Management Team has a standing agenda item on Management Team Meetings on safeguarding, and this helps to provide leadership on safeguarding at the highest officer level.</p> <p>The Council could consider the following options to further strengthen its arrangements:</p> <ul style="list-style-type: none"> • the Safeguarding Policy outlines the governance arrangements for Safeguarding and the individual role and responsibilities of key senior officers as well as the South East Wales Safeguarding Children's Board and Gwent-wide Adult Safeguarding Board. Presenting this information in a schematic would improve clarity of how the individuals and groups align; and • setting out the role of the Joint Safeguarding Scrutiny Committee and the role of individual scrutiny committees in the Safeguarding Policy.

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

Wales Audit Office assessment of Council's progress

- R3** Strengthen safe recruitment of staff and volunteers by:
1. ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;
 2. creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and
 3. requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement.

Summary – Partially Met

The Council has acted to strengthen its safe recruitment of staff. The Council has policies and procedures applicable to all service areas which underpin its safer recruitment of staff. These policies and procedures include a Disclosure and Barring Service (DBS) eligibility assessment to determine if a DBS check is required prior to recruitment, a recruitment charter and a code of practice and a safe recruitment for schools' policy. The Council has assessed all employee posts to identify jobs that require a DBS check and the level. Although there is no legal requirement to renew DBS checks, the Council proactively ensures that employees' DBS checks are renewed every three years.

The Council's payroll system records the date of employees' DBS check approvals. Three months prior to the three-year renewal date, the system alerts the employee and HR. HR monitors DBS renewals monthly. At the time of our fieldwork, the Council informed us that 2,335 jobs require a DBS check. 2,333 employees renewed their DBS check within the three-year renewal period. The two remaining employees did not renew their DBS within three years due to being on long-term sickness absence. The Council continues with face to face verification for staff for DBS renewals. The payroll system was not tested to verify these details as part of our review.

We were informed by the Council that all school governors are DBS checked although we have not been provided with evidence of this.

The Council has a Recruitment Charter and Code of Practice and a Recruitment and Selection Policy – Safer Recruitment in Schools which provide managers, head teachers and other officers involved in recruiting staff for schools with a corporate framework and a summary of the Council's expectations, however, we are not clear whether or how the Council checks compliance.

We were informed that contracts with third parties place responsibility on the contractor for complying with the Council's Corporate Safeguarding Policy. This includes partners in the third sector and commissioned services. Compliance with these arrangements is not checked by the Council as part of its corporate safeguarding arrangements.

	<p>There is a volunteer policy that states volunteers should be treated the same as staff and have a DBS every three years. Responsibility for compliance sits with the manager of the service where the volunteer is working. However, at the time of our fieldwork we found:</p> <ul style="list-style-type: none">• there was no corporate oversight to check and to record that school governors, contractors, agency staff and volunteers are DBS checked on appointment or on renewal every three years;• there is no integrated system to record all DBS checks and check compliance; and• we are not clear whether or how the Council checks compliance with safe recruitment practices. <p>As such, the Council has further work to do to fully address this national recommendation.</p> <p>In addressing this recommendation, the Council should also look to:</p> <ul style="list-style-type: none">• ensure that its monitoring systems enable tracking of safe recruitment and DBS renewal process for agency staff, volunteers and contractors; and• strengthen arrangements for monitoring that services commissioned by the Council undertake safe recruitment practices.
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National recommendations from the 2015 report and local proposals for improvement from the 2014 report

Wales Audit Office assessment of Council's progress

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

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

2. creating a corporate-wide system to identify, track and monitor compliance on attending safeguarding training in all Council departments, elected members, schools, governors and volunteers; and

Summary – Not met

The Council requires all staff to undertake mandatory training on violence against women, domestic abuse and sexual violence (VAWDA&SV) through the all-Wales academy learning platform, At the time of our review, 68% of the workforce had completed this training. Members have recently been offered two sessions on VAWDA&SV and a third session was planned for shortly after our fieldwork.

Council staff have access to the All Wales Academy online learning platform which contains online safeguarding resources, courses and information. Access is free to all staff from any internet enabled device in work or at home. For staff without a Council email address, the appointment letter contains a link to the online learning platform and username and password. This on-line platform is not available to volunteers or governors.

Gwent Safeguarding offers training to all South East Wales councils and social care organisations from statutory and volunteer sectors who provide services for children and their families.

The Council's Corporate Safeguarding Policy places a responsibility on the Designated Strategic Safeguarding Leads to ensure that staff within their directorates are briefed on the policy and to ensure all new employees, as part of their induction, are aware of the policy. The Corporate Safeguarding Policy refers to:

- all employees participating in relevant safeguarding training and multi-agency working to safeguard children and vulnerable adults;
- all employees will be made aware of their safeguarding responsibilities as part of their induction to their employment; and
- employees have the responsibility to ensure they access the appropriate safeguarding training relevant to their role and responsibility.

The Council offered a member briefing on corporate parenting and safeguarding as part of the new member induction programme in 2017. Fifteen members attended.

<p>3. requiring relevant staff in partner organisations who are commissioned to work for the Council in delivering services to children and young people to undertake safeguarding training</p>	<p>Each term, the Safeguarding in Education Manager requests training records from schools including the training records for volunteers and Governors. The Safeguarding Education Manager records training information on a safeguarding matrix. The Governor Support at the Education Achievement Service (EAS) co-ordinates Governor training, with attendance at the training recorded by the Safeguarding in Education Manager and forwarded to the EAS. The training records of volunteers are recorded alongside the training of school staff and are collated with the whole school training registers and recorded on the matrix.</p> <p>The Safeguarding Education Manager monitors training and compiles termly reports and conducts quality assurance visits to schools/education settings.</p> <p>New social care staff have an induction which includes safeguarding. There are three levels of safeguarding training offered by the South East Wales Safeguarding Children Board and attendance is recorded and training needs analyses are completed and monitored by supervising officers.</p> <p>As referred to above, the Council places responsibility for compliance with its Safeguarding Policy by relevant staff in partner organisations who are commissioned to work for the Council in delivering services to children and young people with the host organisation. This includes training. Volunteers in schools are often trained alongside school staff.</p> <p>However, at the time of our fieldwork we found that:</p> <ul style="list-style-type: none"> • whilst elements of safeguarding related training are undertaken, safeguarding training for all relevant staff and all members is not mandated; • there is no corporate understanding or oversight of who is required to complete mandatory safeguarding training; • while staff within social services receive an induction to include safeguarding roles and responsibilities, the Corporate Induction Programme for new employees in other Council services does not include the Corporate Safeguarding Policy, safeguarding roles and responsibilities or safeguarding training; • the Council does not have a corporate-wide system to identify, track and monitor compliance on attendance at safeguarding training for all Council departments, elected members and volunteers; and • the Council places reliance on service managers to ensure contractors comply with any safeguarding training and this is not monitored corporately. <p>As such, the Council has further work to do to address this national recommendation.</p> <p>In addressing this recommendation, the Council should also look to:</p>
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	<ul style="list-style-type: none"> • 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.
R5	National recommendation for the Welsh Government only.

National recommendations from the 2015 report and local proposals for improvement from the 2014 report	Wales Audit Office assessment of Council's progress
<p>R6 Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and council-wide set of performance information covering:</p> <ul style="list-style-type: none"> • benchmarking and comparisons with others; • conclusions of internal and external audit/inspection reviews; • service-based performance data; • key personnel data such as safeguarding training, and DBS recruitment checks; and • the performance of contractors and commissioned services on compliance with council safeguarding responsibilities. 	<p>Summary – Partially Met</p> <p>In 2017, the Council established a Joint Education and Learning and Social Services Scrutiny Committee (safeguarding). The Committee meets three times a year and receives Children and Vulnerable Adults safeguarding performance information to scrutinise and challenge. The Council's constitution reflects this joint scrutiny committee, but it is not included in the Corporate Safeguarding Policy as part of the governance arrangements.</p> <p>Performance reports to the Joint Education and Learning and Social Services Scrutiny Committee (safeguarding) include a range of safeguarding performance indicators and progress against the indicators. The Director of Social Services annual report 2018-19 includes conclusions of Care Inspectorate Wales (CIW) reviews where relevant.</p> <p>However, at the time of our fieldwork we found that:</p> <ul style="list-style-type: none"> • there is no annual Corporate Safeguarding report reflecting safeguarding activity across all Council directorates; • performance reports to the Joint Education and Learning and Social Services Scrutiny Committee (safeguarding) do not include: <ul style="list-style-type: none"> – the performance of contractors or commissioned services in complying with their safeguarding duties and responsibilities; – information on governor, staff, agency workers, contractors and volunteers DBS compliance, safeguarding training or recruitment checks; – comparative data from other councils; nor – corporate safeguarding assurance and oversight information across all services, but focuses on its Education and Social Services only. <p>As such, the Council has further work to do to fully address this national recommendation. In addressing this recommendation, the Council should also look to:</p>

	<ul style="list-style-type: none"> • 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.
<p>Local Proposal for Improvement 2 Strengthen performance and risk management by regularly reporting conclusions from all department safeguarding activity to relevant forums to strengthen oversight and scrutiny.</p>	<p>See narrative above</p>
<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>Summary – Partially Met</p> <p>Following our 2014 national corporate safeguarding review, internal audit undertook a safeguarding review in schools. This review considered several areas such as clear safeguarding roles and responsibilities, DBS checks and safeguarding training. Internal audit gave 'reasonable assurance' meaning 'controls appear to be operating effectively, however, some weaknesses have been identified'.</p> <p>Each school completes an annual control risk self-assessment (CRSA). Internal Audit analyses the returns and decides if an audit is required. In 2017-18, Internal Audit undertook a review of the Schools Safer Recruitment process to determine the effectiveness of the internal controls operating as identified as part of the Control Risk Self-Assessment process. This audit included both volunteers and school staff. Internal Audit gave Limited Assurance and all schools were informed of the outcome of this audit. A follow-up review forms part of Internal Audit's 2018-2023 audit plan. During 2017-18, Internal Audit reviewed the schools control risk self-assessment process and gave an audit opinion of 'reasonable assurance'.</p> <p>Internal Audit has a five-year plan (2019-2024) which is updated annually. Annually, the different services and arrangements within the audit plan are risk assessed to determine a risk rating. Internal Audit writes an annual audit plan following the assessment of risks.</p> <p>The 2019-2024 audit plan contains safer recruitment of staff in schools, social services safeguarding, Protection of Vulnerable Adults (POVA), corporate parenting and DBS. However, despite a service or safeguarding working practice included in Internal Audit's five-year plan, Internal Audit may not review it. An Internal Audit review is dependent on the</p>

	<p>outcome of the annual risk-rating process. On 23 July 2019, the Audit Committee received Internal Audit's annual plan but it is not clear if any safeguarding arrangements are subject to an Internal Audit review in 2019-20.</p> <p>At the time of our fieldwork we found that:</p> <ul style="list-style-type: none"> • even though the five-year Internal Audit Plan contains services and safeguarding processes, these will not necessarily be subject to an internal audit review. Therefore, safeguarding and/or safeguarding procedures may not receive any review from Internal Audit. • apart from its approach to safeguarding audits in schools, the Council has not clearly established a rolling programme of internal audit reviews to test systems and compliance with the Council's Corporate Safeguarding Policy. <p>As such, the Council has further work to do to fully address this national recommendation.</p> <p>In addressing this recommendation, the Council should also look to:</p> <ul style="list-style-type: none"> • 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.
<p>Proposal for Improvement 3 Include safeguarding within the internal audit programme to strengthen accountability and challenge.</p>	<p>See above narrative</p>

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

Wales Audit Office assessment of Council's progress

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.

Summary – Partially Met

'Failure to ensure adequate safeguarding arrangements are in place for all vulnerable children' is an Education directorate risk. 'Failure to ensure adequate safeguarding arrangements are in place for all vulnerable people' is a Social Services directorate risk.

However, at the time of our fieldwork we found that

- safeguarding is not a corporate risk;
- safeguarding is not a service level risk for any other Council service; and
- consequently, risk management plans covering safeguarding are not in place.

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

In addressing this recommendation, the Council should also look to:

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

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