



Denbighshire Internal Audit Services
Caledfryn, Smithfield Road, Denbigh LL16 3RJ

Internal Audit Follow Up – Corporate Safeguarding Review

September 2016



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Purpose & Scope of Review

We originally carried out a review of corporate safeguarding, as requested by the Chief Executive, to ensure that there are robust arrangements in place to safeguard children and vulnerable adults across the Council and in organisations providing services on its behalf. We gave a low assurance rating due to the number of risks/issues that we raised.

Our first follow up review carried out in March 2016 found that good progress had been made in addressing several risks/issues; therefore, we gave a medium assurance rating.

We have now carried out our second follow up of corporate safeguarding to establish progress with addressing the remaining risks/issues.

Assurance Rating (Based on areas reviewed)

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|  | High Assurance | Risks and controls well managed |
|  | Medium Assurance | Risks identified but are containable at service level |
|  | Low Assurance | Risks identified that require meeting with Corporate Director/Lead Member |
|  | No Assurance | Significant risks identified that require member / officer case conference |

Audit Opinion

Overall, good progress has been made following on from our first follow up review in March 2016. Corporately, where safeguarding risks have been identified as a risk, they have been recorded as part of a service's risk register. Within Community Support Services, a new staffing structure has been implemented, along with putting other measures in place, to improve controls for the assessments of Deprivation of Liberty Safeguards (DoLS) referrals. It is too early to establish at this stage how effective these controls are until they are fully embedded.

The Corporate Safeguarding Panel is working more effectively through sharing safeguarding information and having a sub-group to focus on communication and training. Work is progressing to improve the skills and knowledge of the Designated Safeguarding Managers (DSMs) by developing a competencies framework and training programme.

The raising of staff awareness of safeguarding through training has not progressed as well as previously anticipated. This is because the Council has recently changed its software provider for e-learning, causing a delay in the implementation of the safeguarding module. Linked with this is ensuring that employees and elected members are aware of the existence of the Corporate Safeguarding Policy. It is planned for the Policy to be launched to coincide with the roll out of the e-learning module. In the meantime, the Policy would benefit from a review because, while it is legislatively compliant, some of its content is out of date.

Another key area to address is the low attendance of elected members at the mandatory training on safeguarding to ensure that they have sufficient awareness of safeguarding. Democratic Services hopes to introduce e-learning modules in the future to improve access to training for elected members.

Based on the progress made, and the effectiveness of the Corporate Safeguarding Panel, we are providing a 'Medium' assurance rating.

Action Plan

Audit Review of: Corporate Safeguarding Review – Second Follow Up
Date: September 2016

| Corporate Risk/Issue Severity Key | |
|-----------------------------------|--|
| | Critical – Significant CET and Cabinet intervention |
| | Major – intervention by SLT and/or CET with Cabinet involvement |
| | Moderate – Containable at service level. Senior management and SLT may need to be kept informed |

| Risk/ Issue No. | Risk/Issue | Agreed Action Responsibility & Timescale | Current Status | Further Action Needed |
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| 1. | The Corporate Safeguarding Panel is not fulfilling its roles and responsibilities as detailed in its Terms of Reference. Once the membership of the Panel is reviewed, there needs to be better marketing of the Panel, as currently there is a lack of awareness and scrutiny of its work. | The Panel's terms of reference will be circulated and reviewed to confirm that the roles and responsibilities detailed are still relevant. Corporate Safeguarding Panel – November 2015 | Complete The Corporate Director: Communities confirmed that the terms of reference have been reviewed. Panel minutes for 20 January 2016 confirm that they have been agreed by Panel members. The terms of reference will formally be reviewed annually or more often if there are any significant changes. | |
| | | Where services are not represented currently on the Panel, Heads of Service have been contacted to identify officers who can attend. We will also establish whether services can provide a deputy if the service representative is unable to attend. Corporate Director: Communities – September 2015 | Complete (March 2016) The Corporate Director: Communities explained that heads of service have been contacted to confirm their DSM and also to nominate a deputy. The Corporate Safeguarding Policy has been updated to show current Panel membership, including where deputies have been nominated. | Update (August 2016) While this action was recorded as 'complete' in our first follow up review, because of recent service restructures we checked whether there was sufficient representation on the Panel. There is only one service, Finance, which is not represented. We will not follow up this action again as the Corporate Director: Communities is planning to address this. |
| | | Service representatives will ensure | Complete | |

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| | | <p>that their service is aware of the existence of the Panel and that they are aware to use them as a point of contact.</p> <p>Corporate Safeguarding Panel – September 2015</p> | <p>Our discussions with a sample of DSMs identified how they have made members of staff in their service aware of the Panel. However, this process is not fully embedded, as we spoke to members of staff in other service areas and found that they were not aware of the Panel or their DSM.</p> <p>More dedicated resources have been allocated to corporate safeguarding, as the role of the Chair of Panel has developed into more of a facilitator role to ensure that there is sufficient capacity for continuous improvement in raising the awareness of safeguarding.</p> <p>Further work is planned to raise awareness, as the Chair of the Panel is currently meeting DSMs to discuss their responsibilities and how they can raise awareness of safeguarding within their service. It is also anticipated that corporate safeguarding will be a standing agenda item at service manager meetings.</p> <p>There is also a communications sub-group of the Panel which has developed a marketing campaign. A budget has been secured to include developing promotional material. The Team Leader (Communications & Campaign Management) also attends this group to provide advice.</p> | |
| | | <p>The Panel will develop a forward work programme.</p> <p>Corporate Safeguarding Panel –</p> | <p>Complete</p> <p>The Panel has prioritised three areas of work - communications, performance,</p> | |

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| | | October 2015 | and training and awareness. Each work stream has a sub-group that reports directly to the Panel. The Panel will assess its priorities every six months. | |
| 2. | Safeguarding risks are not always recorded and shared corporately to ensure that key risks have been identified and managed appropriately by services. | <p>A communication will be sent to ensure that heads of service consider safeguarding when reviewing their risk registers. A question on safeguarding will also be included in the service challenge.</p> <p>Corporate Director: Communities – October 2015</p> <p>Progress at last follow up – In progress</p> <p>The Corporate Director: Communities explained that Senior Leadership Team (SLT) was reminded at its meeting on 21 January 2016 to consider safeguarding when reviewing service risk registers. Therefore, it is too early for us to assess whether safeguarding risks are being considered, as risk registers have not been formally reviewed yet.</p> <p>We also note that safeguarding was briefly covered as part of a recent service challenge for Finance & Assets. The Corporate Director: Communities is invited to attend the Lines of Enquiry meetings, so she can ensure that safeguarding is covered where appropriate. However, we have advised about ensuring that this is evidenced where possible, as there is nothing currently that would prompt</p> | <p>Complete</p> <p>There has been an improvement since our last review, with the following services incorporating safeguarding risks as part of their risk registers:</p> <ul style="list-style-type: none"> • Education and Children’s Services – risk of a failure to safeguard and staff not following safeguarding responsibilities. • Community Support Services – risk of vulnerable people not being protected due to inefficient Protection of Vulnerable Adults (POVA) and Deprivation of Liberty Safeguards (DoLS) processes. • Facilities, Assets and Housing - risk of severe harm or death to a vulnerable person or child in a Council property. • Highways and Environmental Services – possible weaknesses in DBS disclosure process for learners transport drivers. <p>Where services have not documented safeguarding risks within their risk registers, their DSM has confirmed at their service managers meeting that there was either no safeguarding risks in their area, or that the risk was low.</p> | |

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| | | safeguarding to be included. | | |
| 3. | <p>The Deprivation of Liberty Safeguards (DoLS) process would benefit from a review as, currently, applications are not being prioritised and passed for assessment promptly. This results in poor customer service and could put the Council at risk of a legal challenge.</p> | <p>Establish a DoLS Co-ordinator post to manage and prioritise applications. Head of Service: Community Support Services – September 2015</p> <p>Progress at last follow up – In progress There was a delay in appointing a DoLS Coordinator post as changes to the structure were needed before the post could be advertised.</p> <p>As part of this restructure, a new post of Team Manager for Adult Safeguarding was created and filled in January 2016, which will oversee the Protection of Vulnerable Adults, safeguarding and DoLS.</p> <p>The post of DoLS Coordinator has recently been filled, but a start date has not yet been confirmed.</p> | <p>In Progress</p> <p>The Adult Safeguarding team structure has been further strengthened since our last review with the appointments of a DoLS administration officer in April 2016 and the DoLS Co-ordinator in May 2016.</p> <p>DoLS referrals are now recorded on the Paris system, and have been assessed by the DoLS Co-ordinator. Work has been allocated between the team based on risk-assessed priority of the referral. The Team Manager (Adult Safeguarding) considers the process to be more robust as a result.</p> <p>The DoLS Co-ordinator recently prepared a report on progress with DoLS referrals (July 2016) to the Service Manager (Specialist Services) and this highlighted that 284 people are waiting for a DoLS assessment. Further measures have been put in place in an attempt to reduce this including:</p> <ul style="list-style-type: none"> • Changes to how work is allocated to the Best Interest Assessors (BIA). • Responsibilities of the BIA now included in job descriptions. • Offering individual and group supervision for BIAs. • Additional funding from Welsh Government has been secured to pay for BIA assessments. • Glyndwr University has agreed to provide BIA training so employees do | <p>We acknowledge the work that has been undertaken since our last review to address this risk/issue. However, the measures put in place are not fully embedded, as the number of people waiting for a DoLS assessment is still high. We will carry out testing during our next review to confirm that further controls that have recently been put in place are working.</p> |

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| | | | not have to travel to Chester or Manchester; therefore, training can be provided in the Welsh context. | |
| | | Train more Best Interest Assessors (BIA) to undertake BI assessments. Head of Service: Community Support Services – December 2015 | Complete The Corporate Director: Communities confirmed that 13 members of staff have been trained as Best Interest Assessors during 2015-16, and there is a rolling programme in place to ensure that this training continues. | |
| | | Incorporate role of BIA within new practitioner job descriptions. Head of Service: Community Support Services – January 2016 | Complete The Corporate Director: Communities explained that the new practitioner job descriptions have been amended to include the BIA role. | |
| 4. | The Corporate Safeguarding Policy has not been made available to members of staff to help ensure that they are clear of their roles and responsibilities in relation to safeguarding. A lack of awareness could result in ineffective controls being put in place to prevent or manage safeguarding incidents, resulting in serious harm or death. | The Corporate Safeguarding Policy will be reviewed to ensure that it is up-to-date. The intention is to re-launch the Policy in April 2016 to take account of new legislation and guidance. The Policy is currently included in the induction process and on our website, but we will consider other briefing notes and guidance on safeguarding in the meantime. Corporate Safeguarding Panel & Communications Group – April 2016 Progress at last follow up – In progress The Corporate Director: Communities explained that the policy has been updated. As the amendments are not significant, the policy will not have to | In Progress The Corporate Safeguarding Policy is available on both the intranet and the Internet. The Corporate Director: Communities confirmed that the Policy is legislatively compliant, having taken into account recent changes as part of the new Social Services and Wellbeing Act. However, the Policy has not been officially launched, so employees and elected members may not be aware of its existence. It is intended that this will be done once the e-learning module on safeguarding has been rolled out to employees (see risk/issue 10 for the training update). In the meantime, the Chair of the Corporate Safeguarding Panel has been working with the DSMs from each service to raise their | Following on from the roll-out of training to all employees within the Council, the Corporate Safeguarding Policy needs to be launched so all employees and elected members are aware of its existence and their responsibilities if a safeguarding issue arises (links with Risk/Issue 10). |

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| | | <p>be formally approved again by County Council.</p> <p>The Policy was circulated to the Panel in January 2016 but the minutes do not confirm the approval of the Policy despite Panel members confirming that approval was given.</p> <p>The Policy will be made available to members of staff and elected members on the Council's website, and a re-launch is planned for April 2016 as part of the marketing campaign developed by the communications sub-group. Training and the Chair of the Panel's discussions with DLMs will assist in raising awareness.</p> | <p>awareness of safeguarding and it is expected for them to share the Policy and how it can be applied to their service.</p> <p>Since our last review, the Communications and Training sub-groups have merged into one group, and will be responsible for the Policy's launch.</p> <p>The current Policy is due for review in September 2016, and we have discussed with both the Corporate Director: Communities and the Chair of the Panel how the Policy can be further improved, e.g. by having a separate policy and operating procedures, as the list of DSMs is out of date and the action plan within the Policy needs reviewing as many of the timescales have been missed. Once the Panel has approved the Policy, this should be reflected in the minutes.</p> | |
| 5. | <p>The Safeguarding Action Plan would benefit from a review to ensure that the actions are up-to-date and still relevant. The Plan has not been effectively monitored, which could result in actions not being effectively managed. Consideration should be given to passing the responsibility of monitoring the Plan to the Corporate Safeguarding Panel.</p> | <p>The Social Services Education Management Team (SSEMT) no longer exists, so the Corporate Safeguarding Panel will take over responsibility for monitoring the Safeguarding Action Plan. The Plan will be reviewed to determine whether existing actions are relevant and to take account of any new actions that should be included. This will be linked to the review of the Corporate Safeguarding Policy.</p> <p>Corporate Safeguarding Panel – October 2015</p> | <p>Complete</p> <p>As the Safeguarding Action Plan related to Education and Children's Services issues, the action plan was reviewed and a decision taken to disseminate any outstanding actions into either the service business plan for Education and Children's Services or the Corporate Safeguarding Policy.</p> | |

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| 6. | There is no formal mechanism for recording and sharing safeguarding incidents and near misses corporately. This could result in a lack of awareness, so appropriate measures may not be put in place to prevent safeguarding incidents. | <p>This is a standing item on the Corporate Safeguarding Panel agenda. We will also share case reviews where there is a corporate perspective for lessons learned. Corporate Safeguarding Panel – November 2015</p> <p>As part of the development of the CRM system, we will look at the feasibility of having a corporate system for recording safeguarding incidents. Corporate Director: Communities & Head of Service: Customer and Education Support – December 2015</p> <p>Progress at last follow up – No progress The Corporate Director: Communities is the project sponsor for Contact 360, for implementing a new customer relationship management (CRM) system. Once Phase 1 of the project has been implemented, she plans to incorporate corporate safeguarding into Phase 2.</p> <p>Service representatives will report any key messages from Panel meetings to members of staff within their services. Corporate Safeguarding Panel – October 2015</p> | <p>Complete From Panel minutes, there is evidence of awareness raising of safeguarding issues and where lessons can be learned. Discussions are also held following incidents in other organisations.</p> <p>Complete The proposed project for implementing a new CRM system is no longer continuing. Community Support Services and Education and Children’s Services record safeguarding incidents on the Paris system. Where other services have identified safeguarding issues, these could also be referred and recorded on the Paris system, but it is about ensuring that these are all captured. This will be done through raising awareness of the Policy and implementing training but, currently, DSMs share experiences and good practice of safeguarding issues at the Corporate Safeguarding Panel meetings.</p> <p>Complete Our discussions with a sample of DSMs identified how they have made members of staff in their service aware of the Panel. However, this process is not fully embedded as we spoke to staff in other service areas and they</p> | |

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| | | | <p>were not aware of the Panel or their DSM.</p> <p>More dedicated resources have been allocated to corporate safeguarding, as the role of the Chair of Panel has developed into more of a facilitator role to ensure that there is sufficient capacity for continuous improvement in raising the awareness of safeguarding.</p> <p>Further work is planned to raise awareness, as the Chair of the Panel is currently meeting DSMs to discuss their responsibilities and how they can raise awareness of safeguarding within their service. It is also anticipated that corporate safeguarding will be a standing agenda item at service manager meetings.</p> <p>There is also a communications sub-group of the Panel which has developed a marketing campaign. A budget has been secured to include developing promotional material. The Team Leader (Communications & Campaign Management) also attends this group to provide advice.</p> | |
| 7. | <p>Not all services have considered what performance measures are needed in relation to safeguarding. Having this in place will assist in providing assurance that safeguarding</p> | <p>To be incorporated into the review of the Panel's terms of reference to identify whether performance management information needs to be obtained from services. Corporate Safeguarding Panel – November 2015</p> | <p>Complete</p> <p>The Panel's terms of reference have been reviewed and incorporate the following:</p> <ul style="list-style-type: none"> • Receive and challenge information about corporate safeguarding | |

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| | arrangements are working effectively. | | <p>performance and the progress against work programmes commissioned.</p> <ul style="list-style-type: none"> • Receive and monitor information about the performance management arrangements of every service in relation to their safeguarding responsibilities. <p>Performance is one of the Panel's work streams, and initially its focus is on two performance indicators:</p> <ul style="list-style-type: none"> • Roles requiring Disclosure Barring Service (DBS) checks have had them. • References have been received for all new starters. <p>Performance reports are submitted to the Panel on a quarterly basis.</p> | |
| 8. | There is insufficient vetting of new starters, as the authenticity of certificates supplied to prove qualifications and professional membership are not verified for key posts within the Council. This increases the risk of inappropriate appointments and may mean that children and vulnerable adults are not adequately protected if certificates are fake. | <p>Determine the key posts within the Council that could have an impact on safeguarding. Then we will review the process for these posts to ensure that there are adequate checks done, either by the Council or through an external body. Every new employee contract issued makes reference to safeguarding.</p> <p>Corporate Safeguarding Panel – October 2015</p> <p>Progress at last follow up – In progress</p> <p>The Corporate Director: Communities confirmed that the key posts that will have an impact on safeguarding are governed by those that require a DBS check. She is satisfied that there are</p> | <p>Complete</p> <p>Although the Human Resources Team Manager advised us that HR does not carry out checks of the registration to professional bodies and/or the authenticity of qualifications, this is incorporated into the checks carried out by other services at recruitment stage.</p> <p>The Corporate Director: Communities explained that there is a greater emphasis on having references in place, as well as DBS checks, where appropriate. SLT and CET monitor this every six months.</p> | |

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| | | <p>sufficient controls within the process for checking key social care roles, e.g. checking registration details for social workers with the Care Council for Wales. However, the Panel needs to ascertain the process for other key posts to determine whether the employee is legitimately qualified and/or has obtained professional membership.</p> <p>The HR Team Manager confirmed that contracts issued to new employees now refer to the safeguarding responsibilities of the employee.</p> | | |
| 9. | <p>HR advises that new employees should not start work before a Disclosure Barring Service (DBS) check is returned, unless in exceptional cases. However, services are not allowing sufficient time for the DBS check to be cleared before the employee starts work. If adequate arrangements are not being put in place to counteract this, this may result in a lack of adequate protection for children and vulnerable adults.</p> | <p>To be included in the above review. HR does monitor this and the relevant head of service is contacted where an employee has started employment without a DBS check being in place. The Corporate Safeguarding Panel also receives a report from HR detailing this.</p> <p>HR is doing a presentation to SLT on Safer Recruitment in September. Corporate Safeguarding Panel – October 2015</p> | <p>Complete</p> <p>We confirmed that HR carried out a presentation of Safer Recruitment in September 2015. The Corporate Director: Communities also advised us that the DBS Policy has been reviewed to include checks for overseas personnel, and the Corporate Safeguarding Policy has incorporated the North Wales Professional Concerns Protocol.</p> <p>This has been built into the performance work stream, with quarterly reports being submitted at Panel meetings. Compliance with carrying out DBS and reference checks has also recently been reported to SLT, with significant improvement for the DBS checks. The main concern at this stage is compliance with carrying out reference checks for new members of</p> | |

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| | | | <p>staff and especially internal staff who have moved to a different service. These compliance reports will continue to be circulated to heads of service on a monthly basis and work will be undertaken with their HR business partner where any non-compliance is identified.</p> <p>Our testing of a sample of new starters to the Council confirmed that DBS and references checks were carried out promptly.</p> | |
| 10. | <p>There is a general lack of awareness about safeguarding amongst staff due to a lack of training. This could result in employees not fulfilling their duty of care in reporting safeguarding issues.</p> | <p>There have been training initiatives on safeguarding in some services, but a corporate safeguarding training package is currently being developed by the Learning & Development Specialist (HR). It is hoped that this package will be piloted in October 2015.</p> <p>Corporate Safeguarding Panel – December 2015</p> <p>Progress at last follow up – In progress</p> <p>Training and awareness is one of the Panel’s work streams. Training initiatives within some services have continued, e.g. within Education and Children’s Services and Communication, Marketing & Leisure.</p> <p>The Learning & Development Specialist (HR) has started to design a corporate e-learning training module for corporate safeguarding, which was presented to Panel members in July</p> | <p>In progress</p> <p>Work is progressing in setting up an e-learning module for safeguarding; however, there has been a delay in implementation due to waiting for the corporate e-learning training package to be rolled out. Other software options are being explored in the meantime, but it is hoped that the training will be piloted in September 2016.</p> <p>Approximately 60% of the workforce does not have access to a computer within the Council, so options are being explored as to the best method for them to access the safeguarding training.</p> <p>The Chair of the Corporate Safeguarding Panel has also been holding 1:1s with the DSMs, and has sent questionnaires to them to ascertain their level of knowledge of safeguarding. He plans to develop a competency questionnaire to identify</p> | <p>The implementation of the training module will raise staff awareness of safeguarding.</p> <p>Once staff training has been completed, it is planned for the Corporate Safeguarding Policy to be launched. (See Risk/Issue 4)</p> |

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| | | <p>2015 for feedback.</p> <p>However, there has been a delay in further progressing the development of this training module due to key Panel members involved in the project leaving the Council. However, the new Social Services and Wellbeing (Wales) Act is due to be implemented in April 2016 and the new training module also needs to take into account the impact of the new legislation. The re-launch of the Corporate Safeguarding Policy is intended to coincide with the launch of the new e-learning training module.</p> | <p>training needs for the Corporate Safeguarding Panel members, which will feed into their appraisals and assist with developing a training programme for the DSMs.</p> | |
| 11. | <p>Not all of the elected members have attended mandatory training on safeguarding so may not be clear of their roles and responsibilities. Having an elected member responsible for corporate safeguarding will assist in preventing the misconception that safeguarding is the role of Social Services and Education.</p> | <p>We have recently carried out a training session for elected members on safeguarding.</p> <p>There are planned briefing sessions on safeguarding and Child Sexual Exploitation to County Council starting in November 2015. The Leader has agreed to include corporate safeguarding into his portfolio.</p> <p>Corporate Director: Communities – December 2015</p> <p>Progress at last follow up – In progress</p> <p>The Corporate Director: Communities confirmed that the Leader has overall responsibility for Corporate Safeguarding and attends Panel meetings.</p> | <p>In Progress</p> <p>A Council Briefing training session was held in March 2016 on Child Sexual Exploitation. A further briefing session is planned for November 2016 on Lessons Learned from Rotherham.</p> <p>Based on our review of the elected member attendance sheet at March 2016:</p> <ul style="list-style-type: none"> • 36% have not attended any mandatory safeguarding training or the Council Briefing sessions. • 68% have not attended the mandatory safeguarding training. • 45% have not attended any of the Council Briefing sessions on safeguarding. <p>Attendance levels are therefore a concern, particularly those that have</p> | <p>There needs to be an understanding of the reasons for elected members not attending mandatory safeguarding training. It is important that such training is attended so that elected members are fully aware of their role and responsibilities for safeguarding.</p> |

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| | | <p>Mandatory training sessions for elected members were held in May and July 2015.</p> <p>A Council briefing training session on Safeguarding and Protection was held in November 2015, with further sessions being planned for March 2016 (Child Sex Exploitation) and June 2016 (Lessons from Rotherham). The Corporate Director: Communities hopes that these sessions will cover those members who have not attended the mandatory training sessions.</p> <p>Our analysis of the training sessions held (May, July and November 2015) identified that:</p> <ul style="list-style-type: none"> • 43% of members have not attended any corporate safeguarding training. • 25% of members have attended the Council briefing session but not any of the mandatory sessions. • 32% of members have attended a mandatory training session and the Council briefing. | <p>not attended the mandatory safeguarding training. Democratic Services encourages elected members to attend mandatory training, but it is not enforceable.</p> <p>We have not contacted elected members directly to discuss their reasons for non-attendance, so there may be context that we are not aware of.</p> <p>The Democratic Services Manager explained that training content will be reviewed before the County Council elections in May 2017 and, in particular, they will be looking at the feasibility of providing elected member training through e-learning modules. The Corporate Director: Communities explained that the Welsh Local Government Association has recently released an e-learning module for elected members on safeguarding that could be used.</p> | |
| 12. | Safeguarding arrangements with third party contractors are not robust to ensure that they have appropriate processes in place to manage safeguarding. Due to a lack of awareness, project | <p>To be discussed with the Interim Head of Finance and Assets & Head of Legal, HR and Democratic Services.</p> <p>Key points of conversation to be addressed include:</p> <ul style="list-style-type: none"> • Contractor DBS checks • Ensuring that Council staff | <p>In Progress</p> <p>The Collaborative Procurement Service introduced a commissioning form in April 2016. This should be used where the contract value is estimated to be greater than £25k so that approval can be provided for how the works or</p> | <p>Although the commissioning form has recently been introduced, it was too early for us to carry out any substantive testing to assess how effectively they have been completed</p> |

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| | <p>managers within the Council may not incorporate safeguarding into the contract management process.</p> | <p>responsible on site for the contractor and managing the tendering/contract process are clear of their responsibilities in respect of safeguarding</p> <ul style="list-style-type: none"> • Ensure contracts terms and conditions (including JCT) in relation to DBS checks are appropriate • Ensure that self-assessment arrangements as part of contract management are appropriate <p>Corporate Director: Communities – December 2015</p> <p>Progress at last follow up – In progress</p> <p>The Corporate Director: Communities confirmed that she has discussed this issue with the Interim Head of Finance, Assets & Housing and the Strategic Procurement Manager, as this needs to be considered as part of the wider Procurement Transformation Project that is currently being implemented. It was also recently raised as part of the Service Challenge.</p> <p>The Programme Manager leading this project explained that there is a draft commissioning form, which includes a question on safeguarding. This should act as a prompt for services tendering for contracts where there may be safeguarding issues.</p> <p>The Legal Services Manager also</p> | <p>services will be awarded. A question on safeguarding has been included on the commissioning form. The Collaborative Procurement Service and the Programme Manager will also be involved in monitoring completed commissioning forms.</p> <p>The commissioning form has only recently been implemented, so we appreciate that this is in the early stages of being embedded. We have raised with the Collaborative Procurement Service where one commissioning form for work being carried out in a school potentially had incorrectly answered the safeguarding question.</p> <p>The Legal Services Manager has been involved in setting up joint templates (between Flintshire and Denbighshire) for the standard terms and conditions, which include DBS checks. There will be three different contracts for the standard terms and conditions, which are:</p> <ul style="list-style-type: none"> • Consultancy • Supply of goods • Supply of services | <p>with regards to safeguarding.</p> <p>It is anticipated that the contract templates, incorporating the DBS checks, will be completed by October 2016.</p> |

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| | | <p>confirmed that the standard terms and conditions for contracts are currently being reviewed, and can look at JCT and other types of contracts to ensure that the information in relation to DBS checks is appropriate.</p> <p>The Corporate Director: Communities advised us that she is project sponsor for the Modernising Education programme so can monitor to ensure that safeguarding is considered in any contract arrangements.</p> | | |

Report Recipients

- Corporate Director: Communities
- Chair of Corporate Safeguarding Panel (Lead Officer for Young People, Safeguarding and Workforce Development)
- Leader of the Council
- Chief Executive Officer
- Safeguarding Panel Members

Key Dates

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| Review commenced | July 2016 |
| Review completed | August 2016 |
| Reported to Corporate Governance Committee | 28 September 2016 |
| Proposed date for next follow up review | To be agreed with Corporate Governance Committee |