

'SAFEGUARDING'

ACTION PLAN

	ACTION REQUIRED	TIMESCALE	RESPONSIBLE OFFICER	COMMENTS	ACTION REQUIRED	OUT-STANDING ACTION: OWNER
CRB CHECKS						
1	Review "Criminal Records Check Policy and Procedure" to ensure it complies with most up to date policy guidance	November 2012	Emma Safhill	CRB Policy and Procedure amended after receiving comments from 3 SLT members. The policy has been revised to extend the period for renewing CRB checks from 3 - 4 years apart for those services governed by CCISW which will remain at 3 years. Policy to be amended and put into "intranet" ready format	Going to SLT November 2012 Going to full Council in Jan 2013	Linda Atkin
2	Completion of process to rectify identified employees requiring CRB checks without valid checks on file	Termly	Emma Safhill	Regular reports required.	Reports to be provided termly for schools and corporately and sent to Heads of Service as well as Directors.	Emma Safhill
3	Corporate Director: Customers to write direct to Governors without valid CRB checks requesting compliance (having double checked any reasonable portability of pre-existing CRB	October 2011	Hywyn Williams	16 governors outstanding at 27/1 All complete 21/3/12 14.5.12 100% clearance of governors Process of informing HR about	COMPLETED Reminder to be sent	

	checks)			Governors has improved	to schools termly to remind them to inform HR / Governor Support of new Governors appointed. ES to discuss with Governor Support to see if this is already undertaken.	Emma Safhill
4	Completion of work to ensure CRB clearance of volunteers working in schools	31 December 2011	Emma Safhill	Factsheet sent out to schools asking them to let HR know about volunteers before October 2011 half term. HR to then send CRB forms to any new volunteers. Work completed	Reminder to be sent to all schools termly about informing HR of new volunteers	Emma Safhill
5	Clearance of all school transport staff to be confirmed	30 September 2011	Peter Daniels Emma Safhill	HR will now take over responsibility for sending out CRB forms for School Escorts and monitoring their progress.	COMPLETED For all directly employed staff	
5a	Action added 20/1/12 Taxi drivers- range of issues identified : <ul style="list-style-type: none"> - CRB checks- standard/enhanced - Referring through CRB processes - Consistency of decision-making post CRB 	Range of timescales to June 2012	Peter Daniels/Graham Boase		Specific action plan within SE email 20/1/12- to be completed by Licensing Task Group. 6/8/12. Some delays due to other pressing work in Internal Audit. Progress check	Licensing Task Group- BEJ, SE, GB, GW, IB

	disclosure				meeting to be convened between GB, IB and SE	
6	Business partners to establish regular QA audits of compliance with Criminal Records Check and other safe recruitment policies and procedures, as agreed as part of new HR roles and responsibilities	31 October 2011	Joanne Moore	Safe Recruitment requirements are now part of the regular QA audits carried out by HR in schools. HR completed an in-depth check on corporate reference compliance in 2010 and this indicated an excellent compliance rate for employees appointed directly by DCC. Recent checks also indicated a high compliance. Compliance reports mentioned in 2 above, will be available from the end of January 2013 which will enable managers and head teachers to follow up on non-compliance issues.	HR Audit for 2012/13 due to start in October 2012	Joanne Moore to ensure system is embedded

REFERENCES

7	Completion of spot checks of references held on employee files.	30 September 2011	Emma Safhill	Schools are currently manually checking to ensure references are on file, with spot checks being undertaken by HR. Where there are no references, Schools have	As 6. above Will start annual spot checks on references for Corporate Staff as	Corporate - Emma Safhill Schools – Joanne Moore
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				been advised to undertake a risk assessment. This work will be complete by Christmas 2012.	<p>not currently undertaken</p> <p>Query over process of references for Children's Services staff only. ES requires clarification.</p> <p>Corporate policy has always required 2 references. The policy has been revised to encourage schools to take up references.</p>	
8	Development of formal Recruitment Policy covering requirements for taking up references	October 2012	Andrea Malam	January 2012. Policy is in final draft. HoS Panel established 19/1/12 to review prior to adoption by SLT/Council	<p>Policy has been revised. Due to go to SLT in October 2012. Anticipated full council Jan 2013</p> <p>Corporate policy has always required 2 references. The policy has been revised to encourage schools to take up references.</p> <p>Consideration is being given to including a question about</p>	<p>Linda Atkin as 1 above</p> <p>Linda Atkin</p>

					safeguarding concerns in an employment context.	
9	Development of complementary Recruitment and HR Records Policy for staff employed by schools, with appropriate consultation via the School Improvement and Inclusion Group	October 2012	Joanne Moore Andrea Malam	This will be looked at in conjunction with the Recruitment Policy above	As above (policy above is to be adapted so it incorporates schools also) Policy has been revised. Due to go to SLT in October 2012	Linda Atkin as 8 above
10	Relevant HR Business Partner, Heads and school support staff to lead audit of references held on staff files in schools	31 December 2011	Julie Worrall	Schools are responsible for obtaining their own references for school based staff. A piece of work is currently being completed to confirm the status of reference checks in schools and for those staff who do not have these, a full risk assessment is being carried out and signed off by Head Teachers to confirm that all staff are safe to work with the children in their care. This will be complete by the end of the Autumn term (2012). Thereafter it will form part of the termly compliance reporting.	COMPLETED 14.5.12 New SLA action plans will deal with this and anticipate that these will be drawn up and agreed before the end of the summer term. Part of this work will be to re-audit before October 2012 so that new SLAs can be drawn up and agreed before the next financial year. These checks will then be done on a rolling basis in the future every 12 months as part of the school improvement	Joanne Moore

					audit tool	
11	Headteachers to be asked to risk assess current staff and record outcomes, where no references have been taken up at appointment	31 December 2011	Emma Safhill	See above	<p>COMPLETED IN CONJUNCTION WITH NO. 7 ABOVE</p> <p>Julie Worrall has been monitoring this as part of the SLA work with schools</p> <p>13 schools have not responded / undertaken any action regarding this despite several reminders. Issue raised with Business Partners to discuss with HT during Audits due to begin in October 2012</p>	Joanne Moore
12	Current standard template for reference requests to be reviewed and revised	31 December 2011	Andrea Malam	<p>Has been reviewed and will be part of documentation to be reviewed by HoS Panel (which includes HoS from both Education and SS)</p> <p>Consideration is being given to include a question on both requesting and giving a reference to include a question about safeguarding concerns in an employment context.</p>	Policy has been written- due to go to SLT in November 2012	Linda Atkin as 1 above

OTHER HR RECORDS

13	Review current arrangements for storing and accessing “soft” information	31 December 2011	Emma Safhill	Storing information on staff where there are substantiated (or unproven) child protection concerns but the employee remains in post and possible out of time disciplinary, capability actions which may be relevant and part of a pattern of behaviour).	24.11.11 ES has met with Nia Grisdale from Legal. Initial views are that we cannot store information as it would be against DPA. Nia to review legal aspect and feedback to ES. Feedback given to Sally Ellis	
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COMPLIANCE WITH SAFEGUARDING POLICIES AND PROCEDURES – PARTICULARLY RELATING TO PART IV’S INCLUDING FEEDBACK TO PARENTS

14	The format of minutes of Part IV meetings will be reviewed ensuring headings reflect all the key issues raised in the Pembrokeshire report	Immediate	Wayne Wheatley Sue Trehearn		COMPLETE	
15	Service Manager for Safeguarding and Quality Practice (Children’s Services) and the Education Social Work Team Leader (School Inclusion)	31 December 2011	Wayne Wheatley Sue Trehearn		Audit completed and findings reported to SMT	

	to audit recommended employment actions for all Education Services Part IVs over the past 3 years to ensure recommendations have been carried out					
16	Outcomes meetings to establish routinely that employment related recommendations have been actioned and, if not, that appropriate risk assessments have been carried out and appropriate arrangements made	Immediate	Sue Trehearn	Emma Safhill will be HR Officer responsible for Safeguarding issues and the nominated contact for Part IV meetings. System now in place to check that employment related recommendations are actioned and risk assessments are undertaken if appropriate. Employers are asked to inform children's Services in writing that actions have been completed (Sue Trehearn 19/4/12)	COMPLETE	
17	Governors with safeguarding responsibilities to be invited to Part IV meetings <i>where appropriate</i>	Immediate	Sue Trehearn Wayne Wheatley		5.12.11 COMPLETED Up to date list of governors with safeguarding responsibilities needs to be provided to Child Protection Co-ordinator	Wayne Wheatley
18	Clarification of criteria for	December 2011	Sue Trehearn	Process in place for exceptions	5.12.11	

	reporting to LSCB on individual Part IVs (aggregate reporting is already undertaken)			reports to LSCB SCR Group on individual cases of concern	COMPLETED	
LOCAL AUTHORITY CULTURE						
19	Section on “Safeguarding” to be included as part of quarterly performance reports to Cabinet - under Improving the Council theme	October 2011 onwards	Tony Ward	Section included in Annual Performance Review - October 2011	COMPLETED Section will be included quarterly	
20	Comprehensive Safeguarding Audit Tool to be introduced in all schools as part of routine self assessment process. (This has been subject to initial consultation with Heads and will cover the full range of safeguarding issues, feed into school action planning and Estyn key questions)	By Spring Term 2012	Wayne Wheatley	Audit Tool piloted across 4 schools with v positive outcomes. To be implemented bilingually January 2012, with requirement for all schools to audit to tight timescale. All Action Plans to be returned to ESW for analysis	Audit goes out April 2012 Monitor outcomes	Wayne Wheatley
21	Senior officers to work with Chairs and Vice-Chairs of the new Scrutiny Committees to ensure a balanced programme of scrutiny of safeguarding performance and arrangements	Report on delivery of LSCB Business Plan (Partnerships Scrutiny) November 2011	Sally Ellis Leighton Rees Wayne Wheatley	Relevant items agreed for Partnerships Scrutiny (November 2011) and Performance Scrutiny (November 2011). Regular information on Children’s Services also to be submitted regularly. Safeguarding in Education Services item agreed for Partnerships Scrutiny- March 2012. Seems to ensure reasonable coverage- SE-	COMPLETED	

				30.11.11. Work programme for 12/13 also ensures reasonable coverage		
22	Format for School Standards Monitoring Group to be revised around Estyn key questions. Performance on safeguarding will form a natural part of this	From Autumn term 2011	Karen Evans	Done	COMPLETED 12.11	

TRAINING AND POLICY

23	Target schools without a designated governor with responsibility for safeguarding and ensure those newly designated attend training	End of Christmas Term 2011	Wayne Wheatley Chris Harness	Analysis of gaps and training programme to address due to be finalised by 16.12.11	COMPLETED	
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OTHER

24	Report to the Conwy/Denbighshire LSCB on findings and actions flowing from this work	December 2011	Gabrielle Heeney	On Agenda - Conwy's also	COMPLETED	✓
25	Convening of one meeting	November 2011	Gwen Carrington	ADEW accepted Gwen's invitation	Hywyn Williams to	

	(NWSSIC/ADEW/HR leads) to identify common issues across the region and the potential for sharing leadership of work		Hywyn Williams	to a meeting. Date likely to be December 2011	confirm date of meeting and report back to SSEMT SUPERSEDED	
26	<p>Safeguarding and third sector organisations (Action added 5/12/11)</p> <ol style="list-style-type: none"> 1) Participate in joint group with Conwy on these issues- working to the LSCB 2) undertake quick quality check in Denbighshire on safeguarding arrangements of current Cymorth funded projects 	<p>From December 2011</p> <p>By February 2012</p>	<p>Suzanne Bradley</p> <p>Diane Hesketh/ Wayne Wheatley</p>	<p>Ongoing</p> <p>Request made of 31 projects. 80% response rate within deadline of end January 2012. Upon review by the Safeguarding officer, the following recommendations were made in order to provide consistency, guidance and good practice for future safeguarding within projects and partnerships in Denbighshire including Families First programme projects, that:</p> <ul style="list-style-type: none"> • Each organisation names their child protection/safeguarding officer within policies and procedures, clarifying the role of this officer • each organisation ensures there is a 24 hour per day service, 365 days per year with a repository for child protection information • each organisation adopts and adapts the Authority's "Self audit Tool: safeguarding in your 	<p>Completed January 2012</p>	

				<p>organization” and identifies an action plan and timeline for regular review of all procedures</p> <ul style="list-style-type: none"> • safeguarding training is provided for all new projects and partnerships • safeguarding is now a standing item at CYPSP 		
	<p>3) include requirement for annual self assessment of safeguarding arrangements in Denbighshire contracts for new Families First, Flying Start and 14 - 19 Learning Network agreements</p>	<p>from December 2011</p>	<p>Diane Hesketh/ Jan Juckes- Hughes/Suzanne Bradley/ John Gambles</p>	<p>The new Families First contracts reflect the recommendations from the Safeguarding Officer as above with a specific requirement for annual self assessment and an annual audit of safeguarding practice with an emphasis on more robust safe employment practices</p>		
	<p>4) work through existing Denbighshire umbrella groups and services (eg MyM, PPA, Leisure Services, DVSC, Education Safeguarding Officer) to promote use of annual self assessment approach above and to check safeguarding arrangements of</p>	<p>2012/13</p>	<p>Suzanne Bradley Jamie Groves Wayne Wheatley</p>	<p>Suzanne working on format- to be agreed via Wayne Wheatley/Sally Ellis. Included as condition of new FF contracts from April 2012</p> <p>Agenda item for TSLG January 2012</p> <p>Systematic approach needed to potential roll out beyond funded organisations. January 2012- Leisure Services have allocated responsibilities for safeguarding</p>		

				organisations who attended the first event in March provided us with very little information on the uptake and use of the audit tool, despite their initial enthusiasm on the day. We also contacted those organisations who booked places but did not attend, to make them aware of what they'd missed. I'm not aware of particular resistance, probably more pressure of work. We are planning to provide a better feedback system to put in place with attendees following the events next month”		
27	Restrictive interventions- action added 21/6/12					
27a	Development of policy for use of restrictive interventions	November 2012	Sheila Breeze	SB working with secondary school heads to develop policy. Ratification by governors anticipated September/October 2012, thence to Scrutiny. Policy to be shared with Children’s Services to ensure consistency of approach. Ultimately expected to become part of schools’ self assessment audit framework		
27b	Audit of timeout rooms and subsequent development of policy	November 2012	Sheila Breeze	Audit being undertaken June 2012, including in primary schools. Policy to be developed once audit complete. Thought to be given to		

				how use of timeout rooms could be recorded to enable monitoring. Ratification of policy by governors expected September/October 2012. Policy to be shared with Children's Services to ensure consistency of approach. Ultimately expected to become part of schools' self assessment audit framework		
27c	Agree statement re restrictive interventions for inclusion in school prospectuses	November 2012	Sheila Breeze	Statement to be drafted- upfront but lowkey. Mechanisms for parental consent to be considered		
27d	Agree relevant actions relating to contracted services	April 2013	Sally Ellis/ Vicky Poole	As part of the Children's Workstream within the Regional Hub project 1) Regional Hub to be asked to look at how we take collective approach where there are escalating concerns about a specific residential provision 2) Regional Hub to look at how we ensure existing specs and QA mechanisms are sufficiently tight to pick up on practice re restrictive interventions/use of timeout rooms	Escalating concerns protocol, specific for children's residential provision and monitoring framework under development October 2012	
27e	Report to Scrutiny	November 2012	Sally Ellis/ Hywyn Williams	SSEMT to agree September 2012 the form and content of this- to cover all Pembrokeshire related work, not just use of restrictive	Agenda item for SSEMT September	

				interventions		
27f	Report to LSCB	Annual reporting to LSCB	Relevant Managers	LSCB has prepared a common template for annual reports and feedback and further action points are reported back to services after completion of audit process for the reports submitted.	Reports will be prepared as per work programme for LSCB	