

Cheltenham Borough Council
Audit Committee – 17 June 2015
Section 11 Safeguarding Responsibilities

Accountable member	Councillor Peter Jefferies
Accountable officer	Tracy Brown, Partnerships Team Leader
Ward(s) affected	All
Key/Significant Decision	No
Executive summary	Under section 11 of the Children Act Cheltenham Borough Council has a duty to co-operate to safeguard children. This report sets out those duties and how they are implemented at the Council. It also highlights the local Safeguarding Board's process for checking compliance regarding these duties.
Recommendations	<ul style="list-style-type: none"> • That the Committee note the Council's responsibilities and the associated implementation of those duties • The Committee decides what future role it would like to undertake in terms of the section 11 process.

Financial implications	None as a result of this report Contact officer: Mark Sheldon, mark.sheldon@cheltenham.gcsx.gov.uk, 01242 264123
Legal implications	Section 11 of the Children Act places a duty on organisations including district councils to co-operate in order to safeguard children and young people. Contact officer: Vikki Fennell, vikki.fennell@tewkesbury.gov.uk, 01684 272015
HR implications (including learning and organisational development)	None as a direct result of this report. GO Shared Service HR Team work closely with the Council's Partnership Team Leader to support the implementation of the Safeguarding standards. Contact officer: Julie McCarthy, julie.mccarthy@cheltenham.gov.uk, 01242 264355

Key risks	If safeguarding arrangements are not fully implemented it could result in a failure to safeguard a child.
Corporate and community plan Implications	The Safeguarding Children and Vulnerable Adult Policy supports the council's outcome that people should live in strong, safe and healthy communities.
Environmental and climate change implications	Neutral
Property/Asset Implications	None Contact officer: David Roberts@cheltenham.gov.uk

1. Background

1.1 It is widely acknowledged that to keep children safe from deliberate harm organisations must work together as no single organisation will have the information or resources to do so alone. The key message that safeguarding children is everyone's responsibility is enshrined in section 11 of the Children Act. The Children Act places a duty on organisations including district councils to co-operate in order to safeguard children and young people. Guidance on how to implement this duty is published in the Government's Working Together document. Working Together sets out the statutory requirement for local safeguarding children boards to be established, to co-ordinate and oversee the effectiveness of each organisation's safeguarding arrangements. It also provides the guidance that forms the basis of the section 11 audit that the Gloucestershire Safeguarding Children Board carries out bi-annually. The audit is completed by all organisations that are members or are represented on Gloucestershire Safeguarding Children Board (GSCB).

2. Summary of responsibilities under Section 11 of the Children Act

2.1 The Council's responsibilities under section 11 are broken down into eight separate sections that cover:

- senior management commitment,
- clear statement of responsibility,
- clear accountability,
- service development,
- information sharing,
- work with families,
- staff training
- staff recruitment.

Each section has various sub standards within it, the number of which depend on the overarching standard. As these responsibilities apply to all agencies cited in section 11 of the act some are more or less relevant to the Council and some are not applicable. In Appendix 1 there is a description of each standard that the Council is expected to fulfil, how the GSCB defines what

good looks like, what Cheltenham Borough Council does to fulfil these standards, what checks we have in place to ensure that the standard is being met and what next steps we need to take to ensure we continue to comply or move our practise forward.

- 2.2** Following the most recent review by the GSCB of the section 11 audits at the start of 2015 Cheltenham Borough Council is fully meeting all standards except one sub section of Standard 2 clear line of responsibility and a sub section of standard 4 service development. Both these sub sections are partially met subject to the Council demonstrating we can prove the measures we have in place are effective, then they will be fully met.

3. Partnership working

- 3.1** One of the most effective ways for Cheltenham Borough Council to support the safeguarding of children is through partnership working. The Council is an active member of Gloucestershire Safeguarding Board and jointly facilitates a local safeguarding forum to ensure the key messages from the board reach frontline practitioners in the Borough. The Council is also working with other districts to share good practice and proactively develop the district role in terms of safeguarding.
- 3.2** The Council also works with partners to run safeguarding awareness weeks on topics of concern within the Town. The next such week will take place in September 2015 and will have the theme 'be a good friend and neighbour'.

4. Section 11 Audit

- 4.1** The Gloucestershire Safeguarding Board carries out a full section 11 audit for all of its members and represented agencies every two years. The audit is a self-assessment document that agencies submit to the Board who then review the evidence submitted to ensure consistency. Agencies are then given moderated scores. An action plan must be submitted for any sections or sub sections that aren't fully met. Reviews of the audit are then undertaken at regular intervals. The Safeguarding Board collates the results and any areas that are weak across the whole partnership are addressed.
- 4.2** All six district councils are working together to develop a peer review system whereby on a regular basis the districts could check progress to support the continued development of our safeguarding practice. This would then provide strong evidence for future section 11 audits.

Report author	Contact officer: Tracy Brown, tracy.brown@cheltenham.gcsx.gov.uk, 01242 264142
Appendices	1. Summary of responsibilities and CBC implementation 2. Risk Assessment
Background information	None

Standard	What good looks like	What we do	How we check	Any next steps
Standard 1 – Senior Management Commitment				
A Safeguarding Children Champion is named.	Champion named, taken on the role and operating. There is a named safeguarding champion within the organisation (please provide name and job role in the evidence/comments field).	We have three champions: Elected member safeguarding champion: Councillor Jefferies Officer Safeguarding Champion: Andrew North Allegations Management Champion: Tracy Brown	Every time a new cabinet is formed an elected safeguarding Champion is agreed. The other safeguarding roles are within the remit of the Chief Executive and Partnerships Team Leader respectively	No further action
Safeguarding Champion is identifiable within the organisation by all staff.	Staff are aware that there is a champion and they are aware of the champion's role	The information about who is the champion is on the intranet and given out in an induction booklet We now have a communications timetable to ensure regular safeguarding messages are sent out staff are reminded via the intranet about the role of champion	Once a year we will do a random staff survey to ask question about safeguarding and this will be included	First survey planned for September We now have a communications timetable to ensure regular safeguarding messages are sent out across the organisation.
Senior Management Team monitors Safeguarding actions of staff.	Safeguarding actions of staff are monitored appropriately as regards to their role and the organisations.	Safeguarding is a standing item on the SLT agenda. Reports are made as require but always following GSCB audits. This reporting may include issues related to staff.	Evidence through minutes of meetings	No further action
There is a safeguarding children item on the Senior Management Team agenda.	Safeguarding children is a standing item on every SMT agenda. There are robust discussions in	Safeguarding is a standing item on the SLT agenda. Reports are made as require but always following	Evidence through minutes of meetings	No further action

	relation to safeguarding responsibilities and all Senior Managers are kept up to date with both local and national safeguarding guidance.	GSCB audits.		
Standard 2 – Clear Statement of Responsibility available to all staff and effective Inter-agency working				
The importance of safeguarding and promoting the welfare of children is communicated to all staff.	There are a range of communication tools in place that regularly reinforce the importance of safeguarding and promoting the welfare of children.	Safeguarding messages are given to staff and elected members in the following ways: Intranet Special events Email To ensure regular messages are sent out regarding safeguarding we now have a communication plan A safeguarding awareness fortnight is planned in September 2015	Once a year we will do a random staff survey to ask question about safeguarding to ensure that communications are getting the correct messages across	First survey planned for September
Staff are aware of and working to the South West Child Protection Procedures and statutory guidance.	Staff are made aware of the South West Child Protection Procedures as part of the induction process. There are clear instructions on how to access SWCPP and compliance is monitored through internal audits and supervision arrangements.	Corporate induction includes safeguarding. All staff sign a declaration to say they have understood and will adhere to their safeguarding responsibilities as set out in the safeguarding handbook.	It is tracked on the learning gateway to ensure all staff attend corporate induction and have signed the declaration	Declarations are now being moved forward through the ICT Metacompliance software programme that automates the awareness raising/compliance process. A new induction leaflet which include reference to Prevent and safeguarding is being produced.
A single agency child protection policy is in place	There is a policy in place for this agency, staff are made aware of the policy and they are informed	Cheltenham Borough Council has a joint safeguarding policy for children and vulnerable	Policy is reviewed and formally adopted by cabinet every three years	The policy will need to be reviewed in light of changes to both child and adult services over the coming

	of updates.	adults. Any changes to the policy are communicated through the designated officer group and the intranet.		year
Staff, children and families are aware of how to make complaints when responsibilities are not met (provide a copy of the complaints policy).	There is a clear and easy to understand complaints policy in place, which staff, children and families are made aware of and a) the policy is readily accessible and b) complaints are responded to in a timely manner.	The Council has an advertised complaints procedures and this is monitored and reported on. The officers responsible for dealing with complaints are sensitive to the needs of vulnerable groups	Information around complaints is regularly reported on.	To undertake any reviews necessary in light of feedback from serious case reviews or vulnerable groups.
Staff understand how to raise safeguarding concerns about the practice of other agencies.	All appropriate staff within the organisation are aware of the resolution of professional's disagreements policy. Use of the policy within the organisation is reported back to the GSCB.	The policy is highlighted in the Safeguarding handbook and induction. Support to staff to use it is given by Partnership team Leader and safeguarding champion.	Formal escalations are reported through the Partnerships Team Leader The staff survey will include questions about escalation so we can ensure it is used appropriately	From the survey results take actions necessary to support staff to use the escalation policy more confidently.
Standard 3 – Clear line of Accountability				
A designated individual has overall responsibility for safeguarding.	There is a named individual with overall responsibility for safeguarding within the organisation. (please provide name and job role in the evidence/comments field).	Andrew North Chief Executive has overall responsibility Tracy Brown Partnerships Team Leader is responsible for supporting implementation	No further action	No further action
There are established lines of accountability up through the organisation.	There are clear lines of accountability up through the organisation to the person with ultimate accountability for children's	In addition to the roles already mentioned the organisation also has designated officers who support the implementation	Staff are asked to sign to say they understand the safeguarding roles and responsibilities within the organisation.	Staff were originally signing up to the policy through a learning gateway flipbook however this has been halted so that they can sign

	welfare. Staff are fully informed of the lines of accountability and there is evidence that noncompliance is addressed.	of the policy in their areas of work. The roles and responsibilities of staff regarding safeguarding are set out in the Safeguarding policy handbook.	When relevant managers should discuss safeguarding at team meetings and 1.2.1's	through meta compliance. This needs to be reviewed and depending on timescales for meta compliance the flipbook needs to be restarted.
Standard 4 – Service Development				
Safeguarding is included in service planning (e.g. Business Plans include Safeguarding).	Business Plans include Safeguarding. Needs Analysis is undertaken to determine priorities and actions designed to improve outcomes for children and young people in the local area.	Cheltenham Borough Council facilitates a partnership needs analysis that includes children and young people information. This then informs the Partnership action plan which CBC supports. The action plan currently contains a number of strands that directly impact safeguarding. Currently individual services do not include it in service plans as it is not proportionate to objectives of the service	The Strategic leadership group of Cheltenham Partnerships monitors the action plan	Continue to review if any in house services need to include specific safeguarding outcomes in their plans
Service development plans are informed by the views and experiences of children and families.	Children and families are actively involved in the design, development and delivery of services.	Where applicable council services ask the views of families to inform services The Councils also uses the online pupil service to inform its needs analysis which supports development of partnership work.	None at present	This needs to be kept under review.
FOR COMMISSIONING	Compliance with S11	In recent contracts the	This is monitored through	Review following the first

<p>ORGANSIATIONS ONLY: PVI organisations commissioned to provide services, are compliant with S11 standards and these are monitored through contract monitoring arrangements.</p>	<p>Standards are fully regulated through the contract monitoring arrangements. Any noncompliance is addressed and actions are put in place to ensure full compliance with the standards. The organisation has a demonstrable understanding that it is their responsibility to ensure that organisations providing services on their behalf are compliant with Section 11. The GSCB Guidance for Contractors is used to ensure compliance with S11 standards.</p>	<p>Borough has incorporated relevant parts of the GSCB contractor's guidance.</p>	<p>the contract monitoring process that is established.</p>	<p>year of the contract to make sure that we have effective ways to capture compliance.</p>
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Standard 5 – Effective Information Sharing

<p>Staff are aware of how to access multi-agency guidance on information sharing.</p>	<p>There are information sharing procedures/guidance in place. Staff understanding of the procedures/guidance is monitored through internal audit and supervision checks.</p>	<p>There is an information management training programme and reference group within the Council that disseminates messages to staff and monitor compliance regarding appropriate sharing and storage of data.</p>	<p>Monitored through the information management group.</p>	<p>Review any arrangements in light of new information sharing protocols or recommendations from serious case reviews.</p>
<p>All staff and volunteers who come into contact with children understand the purpose of information sharing in order to</p>	<p>Staff and volunteers who become aware of issues relating to child protection fully understand the importance of information</p>	<p>Information sharing guidance specific to safeguarding is available on the intranet and through safeguarding training which</p>	<p>This will be monitored in the future through a staff survey to ensure understanding</p>	<p>First survey planned for September</p>

safeguard children	sharing in order to safeguard children.	can be accessed by all staff.		
Standard 6 – Work with individual children and their families				
The diversity needs of children are met, and there is equality of opportunity.	Individual needs based on race, language, religion, faith, gender and disability are taken into account when working with a child and their family. There is an equality and diversity policy and action plan in place which is monitored and updated on a regular basis	We have a corporate equality and diversity policy.	This needs to be reviewed	This needs to be reviewed
Vulnerable groups of children and young people are identified by the organisation and their particular needs are being addressed. Vulnerable groups include: LAC, CWD, BME, Bullied Children, CP Plan, Children Missing – Missing Education, EHE, those with a parent in prison.	Vulnerable groups of children and young people are identified by the organisation and there is evidence that their particular needs are being identified and addressed.	Cheltenham Borough Council facilitates a needs analysis of Cheltenham that identifies vulnerable groups and community needs. This is then used in partnership with other agencies to find ways to address these needs For more information see partnership action plan	Partnership action plan is regularly reviewed and any additional needs identified incorporated	Cheltenham Partnership is working to ensure that the evaluation of the action plan measure the direct impact on families in Cheltenham.
Standard 7 – Staff Training				
Staff induction, includes safeguarding information appropriate to their role and responsibilities.	An induction process is in place which includes safeguarding information. All staff receive an introduction to the organisations child protection policy and local reporting processes. The induction always takes	Corporate induction includes safeguarding. All staff sign a declaration to say they have understood and will adhere to their safeguarding responsibilities as set out in the safeguarding handbook.	It is tracked on the learning gateway to ensure all staff attend corporate induction and have signed the declaration	Declarations are now being moved forward through the ICT meta compliance programme. A new induction leaflet which include reference to Prevent and safeguarding is being produced.

	place within the first 6 months of employment			
Appropriate levels of Safeguarding training are accessed by all members of staff which includes; in-house single agency training and as appropriate multi-agency specialist training.	All staff within the organisation have received appropriate levels of safeguarding training or are due to receive the training.	Clear guidelines are available for which level of training staff should have. Managers are able to request additional training for staff if needed	Reports are produced through the learning gateway and noncompliance is addressed with managers. At the last report around 80% of staff had completed training.	Turnover of staff and additional training requirements mean this needs to be regularly reviewed. A new report is being produced and any issues will then be addressed.
Relevant staff have access to safer recruitment training.	Relevant staff have undertaken safer recruitment accredited training, either via the DfE website or from an alternative source (e.g. GSCB safer recruitment training).	Staff have undertaken DfE online training	Records are kept on the learning gateway	Due to staff turnover this needs to be reviewed regularly.
Learning from system reviews, relevant to the organisation have been disseminated and embedded. They might include Serious Case Review's (SCR) and other systems review, Child Death Overview Panel,(CDOP), Critical learning review (Youth Justice Board).	Systematic dissemination of learning from reviews relevant to the organisation and of embedding the learning into the organisational culture.	Messages from serious case reviews and other reviews are disseminated following publication. Informal review messages are disseminated following discussion at GSCB	The reviews so far have not had any implications that need us to changes systems so we have not had to check if they have been embedded.	In Cheltenham there are currently two case reviews being carried out. They are at various stages of completion but following each one we will review the recommendations and take appropriate action.
Standard 8 – Safe recruitment, vetting and allegations procedures				
Interview panels include someone trained in safer recruitment when appropriate.	When appropriate Interview panels always include at least one member who is trained is Safer Recruitment – either	CBC does not currently have any posts that have a statutory requirement to have someone on the interview panel trained	N/A	Continue to review this position and offer safer recruitment training to staff as necessary.

	through the DfE or the GSCB safer recruitment training			
Where appropriate references are taken up prior to interview in accordance with safer recruitment practice. Where organisation guidelines do not stipulate that references must be taken up prior to interview, all recruitment guidelines are followed (e.g. NHS, Police)	References are always taken up prior to interview in accordance with safer recruitment practice. Where organisational guidelines state that references are taken up after interview, this is always the case and staff are not appointed unless a satisfactory reference has been received	References are taken up before an appointment takes place.	GO services monitor this and ensure references are received and satisfactory before appointment is made.	No further action
Regulated activity under DBS has been agreed and checks undertaken.	The organisation undertakes DBS checks on all staff and volunteers who work with children in regulated activity.	There is a risk assessment template that manager carry out to decide what checks a post needs. All relevant posts receive a DBS check before employment is commenced.	Monitoring of this is undertaken by HR. Every three years when the safeguarding policy is formally reviewed we carry out a review of all posts to ensure consistency across the organisation.	Review of all posts early 2016
Risk assessments have been undertaken for activities that no longer meet the regulated activity definition.	For activities that no longer meet the definition of regulated activity, risk assessments have been undertaken and these have been fully documented.	There is a risk assessment template that manager carry out to decide what checks a post needs.	Monitoring of this is undertaken by HR. Every three years when the safeguarding policy is formally reviewed we carry out a review of all posts to ensure consistency across the organisation.	Review of all posts early 2016
The organisation participates in allegations management	The organisation gives full consideration and has arrangements in place to	Tracy Brown is named officer.	The procedure has been used so it is tested.	Staff survey in September

processes.	<p>safeguard children when an allegation is made against a member of staff or volunteer.</p> <p>There is a named officer to whom allegations and concerns are reported.</p> <p>The named person is easily contactable and there are cover arrangements in place if the named person is not available.</p>	<p>If unavailable any designated officer can be contacted.</p> <p>There is a clear procedure set out to report concerns.</p>	<p>As part of the start survey we will include questions to ensure that there is understanding of allegations management.</p>	
The organisation has clear criteria for referring to the DBS.	<p>Staff within the organisation fully understand their responsibility in relation to referring cases to the DBS.</p>	<p>It is laid out in the safeguarding handbook.</p>	<p>As part of the staff survey we will check understanding</p>	<p>Staff survey in September</p>

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	If services commissioned by the Council do not meet the safeguarding standards required the Council may not meet its statutory duties	Deputy Chief Executive		4	2	8	Accept	Continue to monitor safeguarding compliance through Section 11 audit and review practice as necessary.	Ongoing	Tracy Brown	
	If services commissioned by the Council do not meet the required safeguarding standards there may be a failure to safeguard a child or vulnerable adult using those services	Deputy Chief Executive		4	2	8	Accept	Continue to monitor safeguarding compliance through Section 11 audit and review practice as necessary.	Ongoing	Tracy Brown	
	If services areas fail to engage with the safeguarding agenda fully the council may not meet its statutory duties.	Partnerships Team Leader		4	2	8	Accept	Continue to monitor safeguarding compliance through Section 11 audit and review practice as necessary.	Ongoing	Tracy Brown	
	If services areas fail to engage with the safeguarding agenda fully there may be a failure to safeguard a child or vulnerable adult in our care	Partnership Team Leader		4	2	8	Accept	Continue to monitor safeguarding compliance through Section 11 audit and review practice as necessary.	Ongoing	Tracy Brown	
<p>Explanatory notes</p> <p>Impact – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)</p> <p>Likelihood – how likely is it that the risk will occur on a scale of 1-6</p>											

(1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)

Control - Either: Reduce / Accept / Transfer to 3rd party / Close