

Causeway Coast and Glens Borough Council

Internal Audit Report Safeguarding

2018
Final

MOORE STEPHENS

INTERNAL AUDIT REPORT

Safeguarding

Executive Summary

This internal audit was completed in accordance with the approved annual Internal Audit Plan for 2018/19. This report summarises the findings arising from a review of

Through our audit we found the following examples of good practice:

- Causeway Coast and Glens (CCAG) Borough Council have an annual membership with Leisurewatch; a *“membership scheme for organisations that have a responsibility for the public who are using their facilities. can help protect vulnerable adults and children and give your organisation the confidence to recognise, assess and help manage the risk presented by concerning sexual behaviour on your premises.”* Staff are trained to increase their understanding of sexual offending and give them the skills to assess and manage risk in this area, Leisurewatch posters, etc can act as a deterrent for potential offenders and as other councils within Northern Ireland are members, Leisurewatch can share information between the councils to reduce potential risks of known offenders.
- Members of CCAG sit on the Northern Ireland Safeguarding Board and the Local Government Safeguarding Network. This provides a chance to share information and best practice with others. This has provided CCAG Safeguarding Managers with lessons learned and helped support the development of Safeguarding within CCAG.

There were two priority 1 and 2 findings and recommendations arising from our audit.

- Testing revealed that Causeway Coast and Glens Borough Council at present does not have a consolidated safeguarding policy and are currently working with four differing legacy safeguarding policies. There are minor inconsistencies in approach between the four legacy policies. An updated (single) Safeguarding policy is currently in development and nearing conclusion. The finalising of this policy needs to be prioritised and completed as soon as possible.
- From testing audit concluded that Designated Safeguarding officers have received the required training for their roles. A schedule of training is also planned to support the new safeguarding policy and will be rolled out to all Council staff once the updated policy is finalised. It is recommended that safeguarding training and awareness should also be prioritised, and awareness sessions rolled out as soon as possible.

The table below summarises the key risks reviewed:

Risk	Number of recommendations & Priority rating		
	1	2	3
The Council may not be aware of its safeguarding duties leading to unnecessary risks to children, young people and vulnerable adults and non-compliance with statutory responsibilities	1	-	1
Recruitment processes may be inadequate to identify individuals who should not be working with children, young people or vulnerable adults	-	-	-
Staff and elected members may not be aware of their safeguarding responsibilities leading to increased risk to children, young people and vulnerable adults and staff and elected members being at risk of unintentionally acting inappropriately	-	1	-
Safeguarding concerns, allegations or incidents may not be reported or acted upon leading to continued risk to the child, young person or vulnerable adult and a failure of duty on the part of the Council	-	-	-
Total recommendations made	1	1	1

Based on our audit testing we are able to provide the following overall level of assurance:

Limited Assurance	There are significant weaknesses within the governance, risk management and control framework which, if not addressed, could lead to the system objectives not being achieved
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Points for the attention of Management

Executive Summary..... 2

1 Objective 5

2 Background 5

3 Risks 5

4 Audit Approach..... 6

5 Findings and Recommendations 6

 5.1 Risk 1 – Safeguarding Duties 6

 5.2 Risk 2 – Inadequate Recruitment Processes 8

 5.3 Risk 3 – Staff Safeguarding Responsibilities 8

 5.4 Risk 4 – Inadequate Safeguarding Reporting 8

Appendix I: Definition of Assurance Ratings and Hierarchy of Findings..... 9

Appendix II: Summary of Key Controls Reviewed..... 10

Appendix III: Points for the Attention of Management 12

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Distribution:	Audit Committee Chief Executive Head of Sport and Wellbeing Director of Leisure and Development
	August 2018

Audit progress	Date
Audit commenced	18 th June 2018
Draft Report issued to senior management for response	28 th August 2018
Responses Received	12 th September 2018
Responses Agreed	12 th September 2018
Report Issued	12 th September 2018

All matters contained in this report came to our attention while conducting normal internal audit work. Whilst we are able to provide an overall level of assurance based on our audit work, unlike a special investigation, this work will not necessarily reveal every issue that may exist in the Council’s internal control system.

1 Objective

Our aim is to provide assurance to Senior Management, the Chief Executive and the Audit Committee Members on the contribution of control, risk management and governance processes regarding safeguarding, to the achievement of the Council's corporate objectives.

The objective of this review was to form an opinion as to:
the level of internal controls in existence in relation to safeguarding;
whether or not these controls are operating effectively.

2 Background

Safeguarding means enabling people to live their lives free from harm, abuse and neglect, and have their health, wellbeing and human rights protected. Causeway Coast and Glens Borough Council have a responsibility to safeguard children, young people and adults at risk within the area. The Council, Council staff and elected members may have access to children, young people and adults at risk in a diverse number of settings, either directly or indirectly.

Elected members may have access to children, young people and adults at risk as part of their role. The Local Government Association recommends that training is needed to reflect the level and type of contact.

The Protection of Children and Vulnerable Adults (Northern Ireland) Order 2003 established safeguarding arrangements aimed at strengthening protection for children and adults at risk in workplace situations.

In addition to a moral obligation to safeguard children, young people and adults at risk, under the Common Law Duty of Care the Council is responsible for taking reasonable steps to ensure the safety and wellbeing of all children, young people and adults at risk in the Community.

3 Risks

The risks identified by Internal Audit relating to safeguarding and agreed with management are as follows:

1. The Council may not be aware of its safeguarding duties leading to unnecessary risks to children, young people and adults at risk and non-compliance with statutory responsibilities.
2. Recruitment processes may be inadequate to identify individuals who should not be working with children, young people or adults at risk.
3. Staff and elected members may not be aware of their safeguarding responsibilities leading to increased risk to children, young people and adults at

risk and staff and elected members being at risk of unintentionally acting inappropriately.

4. Safeguarding concerns, allegations or incidents may not be reported or acted upon leading to continued risk to the child, young person or adult at risk and a failure of duty on the part of the Council

4 Audit Approach

Our audit fieldwork comprised:

- Documenting the systems via discussions with key staff
- Consideration of the key risks within each audit area
- Examining relevant documentation
- Carrying out a preliminary evaluation of the arrangements and controls in operation generally within the Council
- Testing the key arrangements and controls
- Testing the completeness and accuracy of records.

The table below shows the staff consulted with and we would like to thank them for their assistance and co-operation.

Job title

Sport & Wellbeing Development Manager
Participation Manager
Leisure Centre Staff
Business Support and Administration Manager

5 Findings and Recommendations

This section of the report sets out our findings in relation to control issues identified and recommendations. A summary of all the key controls that we considered is included in Appendix II to this report.

5.1 Risk 1 – Safeguarding Duties

ISSUE 1 – CCAG do not have an active, up-to-date Safeguarding policy

- a) **Observation-** Testing revealed that Causeway Coast and Glens Borough Council at present does not have one consolidated safeguarding policy and are currently working with four differing legacy Safeguarding policies. Audit acknowledges however an updated Safeguarding policy is currently in development, at the time of audit this policy was still to be agreed and finalised.

<p>b) Implication- In the absence of a single and up to date safeguarding policy there is an increased risk of inconsistencies in approach to safeguarding and a risk that elected members and council employees may not be fully aware of safeguarding duties leading to unnecessary risks to children young people and adults at risk.</p>
<p>c) Priority Rating- 1</p>
<p>d) Recommendation- The Safeguarding policy which is currently under development should be prioritised, approved, finalised and in action as soon as possible. Council should finalise the policy so that roles and responsibilities of staff/departments are clear.</p>
<p>e) Management Response- Revised, updated and re-formulated draft Safeguarding Policy and Procedures for Children & Young People and Adults (2 separate documents) forwarded to NSPCC on 12.09.18. Meeting scheduled between NSPCC and Council's Safeguarding Managers' to review these documents and sign them both off. Then Policies and Procedures presented to the Senior Management Team and submitted for Equality Screening.</p>
<p>f) Responsible Officer & Implementation Date- Safeguarding Managers': Sport & Wellbeing Development Manager (Damian McAfee) + Participation Manager (Roger Downey) – Policy and Procedures (both) implemented January 2019</p>

ISSUE 2 – External groups/organisations using CCAG facilities

<p>a) Observation- External groups using Council Leisure facilities should provide evidence of their own safeguarding policy or agree to abide by Council's safeguarding policy when making a booking. Testing revealed, that groups were providing such evidence however it was noted that six out of eight booking forms currently in use and one of two terms of hire did not clearly state this requirement prior to booking.</p>
<p>b) Implication- Although no evidence was found that safeguarding documentation was not being requested there is a small risk that an external organisation may be able to use a council facility without providing required information.</p>
<p>c) Priority Rating- 3</p>
<p>d) Recommendation- Council should create a standardised procedure, booking form and terms of hirer highlighting that external clubs/organisations either need their own Safeguarding policy, or they need to remain compliant with the CCAG safeguarding policy (currently under development); they should also provide a safeguarding registration number (if applicable). If a standardised form is not practical, then all existing booking forms should be adapted to include the requirement for safeguarding compliance mentioned above.</p>
<p>e) Management Response- A Business Support Manager has just recently been appointed (Sport & Wellbeing) who is currently working on standardising all booking forms across Council's leisure facilities. All revised booking forms will detail the requirement for safeguarding compliance.</p>

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| f) Responsible Officer & Implementation Date- Business Support Manager (Stacy McClarty) – October 2018 |
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5.2 Risk 2 – Inadequate Recruitment Processes

We have no findings or recommendations to make against this risk area.

5.3 Risk 3 – Staff Safeguarding Responsibilities

ISSUE 3 – Adequate up-to-date training is not provided

- a) **Observation-** Discussions and testing revealed that a training schedule for safeguarding designated officers and other staff is not currently in place. Designated officers have received safeguarding training and CCAG is a member of a Leisurewatch scheme which mean that staff from six out of eight Council leisure facilities receive Leisurewatch training. However, Leisurewatch focuses on sexual abuse and does not take all aspects of safeguarding into consideration.

Audit was advised that training and awareness was in development to support the new (draft) safeguarding policy.

- b) **Implication-** If staff are not trained in the new safeguarding policy there is a risk that staff and elected members may not be fully aware of their safeguarding responsibilities.

- c) **Priority Rating-** 2

- d) **Recommendation-** Once the consolidated and updated safeguarding policy is finalised training should be urgently arranged. Various levels of training should be developed and distributed accordingly, for example introduction training to all staff, foundation/basic training for those who regularly work with children, young people and adults at risk and designated officer training. Once the training has been created it should be reviewed regularly and updated when necessary. The need for any additional training for the Designated officers should be reviewed, provided and completed urgently. All training should be recorded and documented to track when training needs to be refreshed.

- e) **Management Response-** Once both Safeguarding Policies and Procedures have been approved by Council a training schedule for all appropriate staff will be drawn up and delivered in keeping with the requirements contained within the Safeguarding Policies and Procedures. This training may be out-sourced or Council may wish to skill up (send on recognised awarding body training course) appropriate staff as in-house trainers. All training will be documented and recorded.

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| f) Responsible Officer & Implementation Date- Organisational Development / Human Resources Manager (Sandra Kelly) |
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5.4 Risk 4 – Inadequate Safeguarding Reporting

We have no findings or recommendations to make against this risk area.

Appendix I: Definition of Assurance Ratings and Hierarchy of Findings

Satisfactory Assurance

Evaluation opinion: Overall there is a satisfactory system of governance, risk management and control. While there may be some residual risk identified this should not significantly impact on the achievement of system objectives.

Limited Assurance

Evaluation opinion: There are significant weaknesses within the governance, risk management and control framework which, if not addressed, could lead to the system objectives not being achieved.

Unacceptable Assurance

Evaluation opinion: The system of governance, risk management and control has failed or there is a real and substantial risk that the system will fail to meet its objectives.

Hierarchy of Findings

This audit report records only the main findings. As a guide to management and to reflect current thinking on risk management we have categorised our recommendations according to the perceived level of risk. The categories are as follows:

Priority 1: Failure to implement the recommendation is likely to result in a major failure of a key organisational objective, significant damage to the reputation of the organisation or the misuse of public funds.

Priority 2: Failure to implement the recommendation could result in the failure of an important organisational objective or could have some impact on a key organisational objective.

Priority 3: Failure to implement the recommendation could lead to an increased risk exposure.

Appendix II: Summary of Key Controls Reviewed

Budgetary Control

Risk	Key Controls
<p>The Council may not be aware of its safeguarding duties leading to unnecessary risks to children, young people and adults at risk and non-compliance with statutory responsibilities</p>	<ul style="list-style-type: none"> • Child & adults at risk Protection Policy(ies) in place to include requirements for external groups using Council facilities • A designated person(s) is responsible for safeguarding (eg Designated Child Protection Officer) • Policy and name of designated person(s) is communicated to staff, elected members and the public • Safeguarding procedures for the designated person(s) have been documented • Risks to children, young people and adults at risk have been identified and assessed • Liaison with Safeguarding Board for NI as appropriate • The Council promotes its safeguarding policy to the public • Adult: Child ratios for Council-run events (eg summer schemes, sports events) meet the ratios required by the Council Policy and recommended practice
<p>Recruitment processes may be inadequate to identify individuals who should not be working with children, young people or adults at risk</p>	<ul style="list-style-type: none"> • Identity and qualifications of those being recruited are verified • Professional and character references are followed up (including existing staff moving into a new position) • Positions across the Council requiring Access NI vetting are identified (including those which may not be formally designated as 'Regulated Positions') • Individuals are not authorised to commence work until clearance is received by Access NI • The roles and responsibilities of staff working with children, young people and adults at risk are clearly defined • A Code of Conduct is in place covering safeguarding
<p>Staff and elected members may not be aware of their safeguarding responsibilities leading to increased risk to children, young people and adults at risk and staff and elected members being at risk of unintentionally acting inappropriately</p>	<ul style="list-style-type: none"> • Training is devised to cover the range of safeguarding issues (eg basic, general course; for those working with children, young people and adults at risk) • Training is provided to the designated person(s), Council staff and elected members. • Content of safeguarding training is regularly reviewed to ensure it is up-to-date. • Designated person has received adequate training. • Completed training is recorded and monitored to ensure that staff complete initial training or receive refresher training as required
<p>Safeguarding concerns, allegations or incidents may not be reported or acted upon leading to continued risk to the child, young person or adults at risk and a failure of duty on the part of the Council</p>	<ul style="list-style-type: none"> • There is a clear process for reporting and dealing with concerns raised • Records are adequately maintained of any concerns raised and/or matters investigated • Records relating to safeguarding concerns and investigations are kept secure and staff are clear as to how and where such records should be held, and who by • Where an incident is reported, or concern raised, procedures are correctly followed, and concerns escalated appropriately

Risk	Key Controls
	<ul style="list-style-type: none"><li data-bbox="667 327 1430 416">• Lessons are learned from instances that are investigated and appropriate action taken by the Council to prevent re-occurrence of issues<li data-bbox="667 421 1430 510">• Senior management and elected members are made aware of any safeguarding concerns in line with confidentiality and Policy restrictions

Appendix III: Points for the Attention of Management

Increase Leisurewatch membership

Observation:

Currently six out of eight Council Leisure facilities are included within the Leisurewatch scheme. Management should consider adding all remaining leisure facilities to the Leisurewatch scheme so all leisure centres/facilities in the CCAG area will be included.

Management Response: Head of Service (Wendy McCullough) has authorised the inclusion of the two remaining sport & wellbeing facilities i.e. Dungiven Sports Forum & Sheskburn Recreation Centre to the Leisurewatch Programme commencing the new 2019 membership year.

Record Lessons Learned

Observation:

From discussion with Safeguarding officers we note that lessons are being learned from any safeguarding issues that do arise and that these have been integrated into the draft safeguarding policy under development in CCAG i.e. It would be useful if lessons learned from scenarios, the sharing of best practice between councils and from real life incidents were formally documented and shared with relevant staff across Council, perhaps through regular safeguarding updates or ongoing training.

Management Response: With both Safeguarding Managers' sitting on the NASP and LGSN respectively, minutes from all meetings will be produced detailing any and all best practices / learning from real life incidents and this information will be disseminated to all Designated Safeguarding Officers' as part of regular Safeguarding Team meetings which will be implemented on the back of the training schedule.