



Reference: 1244A2019-20

Date issued: June 2019

Cardiff Council: Follow-up review of corporate arrangements for the safeguarding of children– draft report – feedback

Exhibit 1: Council comments on the ‘follow-up review of corporate arrangements for the safeguarding of children’ draft report in an email from Claire Marchant dated 31 May 2019, plus additional comments from Chris Pyke received on 14 June 2019, and the Wales Audit Office’s response

Report text	Council Comments E-mail from Claire Marchant, 31 May 2019	Wales Audit Office response
<p>R3: Strengthen safe recruitment of staff and volunteers</p>	<p>Cardiff Council acknowledge that there is a need to update our DBS and Recruitment policy. We would welcome, however, that the report makes comment on and shows that the council's current Recruitment policy is under review in line with safe recruitment changes. We would also wish to stress that many items covered under safer recruitment are already included in our corporate recruitment process.</p>	<p>Changes to text in draft report are tracked:</p> <p>Partially met – an area for improvement identified.</p> <ul style="list-style-type: none"> • The Council has a DBS Policy that is clear on respective responsibilities, although it is overdue a review (the date for review is May 2016). <u>The Council acknowledge the need to review this policy.</u> • The Council has a Recruitment and Selection Policy that is also overdue a review (the date for review is November 2016) and it should be strengthened as set out in P3 above. <u>The Council recognise the need to update this policy and have stated that the policy is currently under review in line with safe recruitment changes. The Council's view is that its corporate recruitment process covers many items under safer recruitment. We do not disagree with that viewpoint, but we believe that safeguarding matters should feature more prominently in the Recruitment and Selection Policy.</u> • The Council's Corporate Safeguarding Policy refers to a Safe Recruitment Policy but this policy does not exist. • The Council has recognised an existing weakness in its arrangements in that it has not had a Volunteering Policy. However, one has been drafted and is due to be published shortly

<p>R7: Establish a rolling programme of internal audit reviews and to undertake systems testing and compliance reviews on the council's safeguarding priorities</p>	<p>The commentary on the work of internal audit is so concise that it may mislead the reader of the report, as it does not credit any audit work other than the recent corporate safeguarding audit:</p> <ul style="list-style-type: none"> • The original recommendation was in respect of a rolling programme of internal audit reviews. Accordingly, it is important that the findings reflect that whilst a corporate safeguarding audit has not been undertaken until recently, the Internal Audit service has been undertaking testing of compliance and controls in respect of safeguarding in high risk areas as part of standard audit test programmes. In particular, compliance and control testing has been undertaken within audits in the Social Services and Education and Lifelong Learning directorates. • The report should also take into account that the Internal Audit team undertakes assurance and consultancy work. For instance, there was a period of time following the original report when a Principal Auditor attended Corporate Safeguarding Board Meetings to provide advice and guidance, and to identify the higher risk areas for audit planning. <p>We would, as a council, therefore, appreciate that the above comments are considered and commented on within the body of the report.</p> <p>{Subsequent comments from Chris Pyke received 14 June 2019 were also taken into account. He said 'The Principal Auditor attended the Corporate Safeguarding Board through the financial year 2015/16. The Head of Finance became the acting Audit Manager in April 2016, and commenced attending the Board. The current Audit Manager appointed in October 2018, reports to the Head of Finance, and whilst he has full rights of access has agreed with the Head of Finance that he will not attend the Board per se but would be advised should an agenda be of particular audit interest. Minutes and papers can be requested by Internal Audit as and when required, and have been reviewed as part of the recent Corporate Safeguarding audit.</p>	<p>Changes to text in draft report are tracked:</p> <p>Partially met:</p> <p>The Council has been slow to respond to this recommendation <u>from a corporate-wide perspective</u>. Until recently Internal Audit has not undertaken any reviews on the Council's corporate safeguarding arrangements. However, Internal Audit published a report on the Council's corporate safeguarding arrangements in January 2019 and will be doing a follow-up of that review in 2019-20. An Internal Audit review of recruitment is also planned for 2019-20.</p> <p><u>Internal Audit has undertaken testing of compliance and controls in respect of safeguarding in high risk areas within the Social Services and Education and Lifelong Learning directorates. A representative from Internal Audit used to attend the Corporate Safeguarding Board meetings. Whilst this is no longer the case, Internal Audit can request the agendas and minutes of the Corporate Safeguarding Board meetings and we understand Internal Audit reviewed these papers as part of its corporate safeguarding audit.</u></p>
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	In respect of the compliance and control testing in Social Services and Education and Lifelong Learning Directorates, further information is included on the following pages.}	