

# Public Document Pack

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For all enquiries relating to this agenda please contact Amy Dredge  
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**Date: 21st January 2020**

Dear Sir/Madam,

A meeting of the **Audit Committee** will be held in the **Sirhowy Room, Penallta House, Tredomen, Ystrad Mynach** on **Tuesday, 28th January, 2020** at **2.00 pm** to consider the matters contained in the following agenda. Councillors and the public wishing to speak on any item can do so by making a request to the Chair. You are also welcome to use Welsh at the meeting, both these requests require a minimum notice period of 3 working days, and a simultaneous translation will be provided if requested.

All Committee meetings are open to the Press and Public, observers and participants are asked to conduct themselves with respect and consideration for others. Please note that failure to do so will result in you being asked to leave the meetings and you may be escorted from the premises.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'CHARRY'.

**Christina HARRY**  
INTERIM CHIEF EXECUTIVE

## A G E N D A

Pages

1 To receive apologies for absence.

2 Declarations of Interest.

Councillors and Officers are reminded of their personal responsibility to declare any personal and/or prejudicial interest(s) in respect of any item of business on this agenda in accordance with the Local Government Act 2000, the Council's Constitution and the Code of Conduct for both Councillors and Officers.

A greener place Man gwyrddach



To approve and sign the following minutes: -

- 3 Audit Committee held on the 15th October 2019. 1 - 6

To receive and consider the following reports: -

- 4 Presentation from the Pension Fund Actuary.
- 5 Audit Committee Forward Work Programme for 2020. 7 - 10
- 6 Certification of Grants and Returns 2018-19. 11 - 22
- 7 Regulator Proposals for Improvement Progress Update. 23 - 32
- 8 Corporate Risk Register (Q2 2019/20). 33 - 42

To receive and note the following information items:-

- 9 Regulation of Investigatory Powers Act 2000. 43 - 46
- 10 Annual Audit Letter - Caerphilly County Borough Council 2018-19. 47 - 50
- 11 Caerphilly Certificate of Compliance - Audit of Caerphilly County Borough Councils' Assessment of 2018-19 Performance. 51 - 52
- 12 Officers Declarations of Gifts and Hospitality. 53 - 58
- 13 Six monthly update on the number of Complaints received under the Council's Corporate Complaints Policy. 59 - 66
- 14 Corporate Governance Review Panel Minutes - 24th September 2019. 67 - 68
- 15 Corporate Safeguarding Review Report. 69 - 106

*\*If a member of the Audit Committee wishes for any of the above information reports to be brought forward for discussion at the meeting please contact Amy Dredge, 01443 863100, by 10.00 a.m. on Monday 27th January 2020.*

**Circulation:**

Councillors M.A. Adams, Mrs E.M. Aldworth, J. Bevan, A. Gair, Ms J. Gale, D.T. Hardacre, C.P. Mann, B. Miles, Mrs T. Parry, Mrs M.E. Sargent (Chair), G. Simmonds and J. Simmonds

Lay Member – Mr N.D. Yates (Vice Chair)

Auditors –Ms N. Jenkins (Wales Audit Office), Ms G. Hawkins (Grant Thornton UK LLP) and Mr B. Morris (Grant Thornton UK LLP)

And Appropriate Officers.

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## AUDIT COMMITTEE

### MINUTES OF THE MEETING HELD AT PENALLTA HOUSE, TREDOMEN, YSTRAD MYNACH ON TUESDAY 15TH OCTOBER 2019 AT 2.00 PM

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#### PRESENT:

Councillor M.E. Sargent – Chair  
N. Yates – Vice Chair

#### Councillors:

M. Adams, Mrs E. Aldworth, A. Gair, Ms J. Gale, C.P. Mann, Mrs B. Miles, Ms T. Parry, G. Simmonds and J. Simmonds.

#### Together with:

R. Edmunds (Corporate Director for Education and Corporate Services), S. Harris (Interim Head of Business Improvement Services and Acting Section 151 Officer), R. Harris (Internal Audit Manager), D. Gronow (Audit Group Manager), R. Roberts (Business Improvement Manager) and A. Dredge (Committee Services Officer).

N. Jenkins (Wales Audit Office - WAO).

#### 1. APOLOGIES

Apologies for absence were received from Councillors J. Bevan and D. Hardacre.

#### 2. DECLARATIONS OF INTEREST

There were no declarations of interest received at the commencement or during the course of the meeting.

#### 3. MINUTES – 11TH JUNE 2019

RESOLVED that the minutes of the Audit Committee held on the 11th June 2019 (Minute No. 1 – 13) were approved as a correct record.

#### 4. MINUTES – 23RD JULY 2019

RESOLVED that the minutes of the Special Audit Committee held on the 23rd July 2019 (Minute No. 1 – 5) were approved as a correct record.

#### REPORTS OF OFFICERS

Consideration was given to the following reports.

## 5. AUDIT COMMITTEE FORWARD WORK PROGRAMME

The Interim Head of Business Improvement Services and Acting Section 151 Officer presented the Forward Work Programme. He explained that prior to the next meeting, a 12 month programme will be populated in order that the Committee can comment upon and request additional reports to those scheduled for 2020. A Member requested information on the current 3 year Pensions' Audit and the impact on the Council's Pension liability. The Officer advised that all information available had been sent to the Member previously and this can be resent via email following the meeting.

It was agreed at the meeting on the 11th June 2019 that the Pension Fund Actuary be invited to attend this meeting regarding the pension deficit. Unfortunately, the representative was not available to attend and will now be invited to the next meeting of the Audit Committee on the 28th January 2020. In addition, the latest triennial report of the Fund Actuary will be available in December 2019. Therefore, up-to-date information and any further clarification required can be provided to Members at that meeting. Members noted the Forward Work Programme and supported the proposals for the next meeting.

The Chair thanked the Officer for the update.

## 6. ANNUAL IMPROVEMENT REPORT 2018/19

N. Jenkins from the Wales Audit Office (WAO) presented the report that was issued at the end of July 2019. The report outlines the key messages from the (WAO) Annual Improvement Report (AIR). The AIR makes a judgement as to whether the Council are likely to comply with its statutory duty in compliance with the Local Government (Wales) Measure 2009 to 'make arrangements to secure continuous improvement'. She confirmed that for 2018/19 the WAO judgement was that *"The Council is meeting its statutory requirements in relation to continuous improvement and is at a crucial pivotal point in its ambition to transform". This is based on, and limited to, the work carried out by the WAO and relevant regulators. The Auditor General believes that the Council is likely to comply with the requirements of the Local Government Measure (2009) during 2019-20.*

Members were referred to appendix 1 and noted that during the course of the year, the Auditor General did not make any further formal recommendations. However, a number of proposals for improvement were made and their progress will be monitored and relevant recommendations made in the national reports (AIR Appendix 3) as part of the improvement assessment work. Exhibit 1 summarises the work reported on in 2018/19. This includes continuing the delivery of the Flying Start programme and examining the extent to which the council has acted in accordance with the sustainable development principle, within the Wellbeing of Future Generations (Wales) Act 2015. A service user perspective was also undertaken regarding many aspects of the Welsh Housing Quality Standard (WHQS) Programme to include the WHQS follow-up review. In addition, proposals for improvement were undertaken with the Business Improvement Portfolio Board and the Council's Corporate Safeguarding Arrangements.

It was noted that the Council complied with its duty for Improvement Planning and Reporting, through the published Well-being Objectives, and the assessment of performance in the Annual Performance Report for the year 2017/18. No proposals for improvement were made. The WAO provided confirmation certificates that these duties were met and these were received by the Audit Committee as information items on 24th July 2018 and 29th January 2019.

Reference was made to appendix 3 which sets out the National report recommendations for 2018-19, that contains links to access all available reports. Ms Jenkins extended her thanks to Officers and Members for their support during the period of assessment.

A Member sought clarification regarding the absence of a timeline for target improvements and made reference to aligning levers for change within the Business Improvement Portfolio Board and Corporate Safeguarding Arrangements. Ms Jenkins advised that in respect of each piece of work, the WAO would ask the Council to respond in terms of an action plan and updates on progress would be provided at future meetings of an update as to this progress will be reported at the next Audit Committee meeting.

The Chair thanked Ms Jenkins and Officers for delivering the report and responding to questions during the course of the debate.

Following consideration and discussion, it was moved and seconded that the recommendation in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that the Annual Improvement Report (AIR) 2018/19 as set out in Appendix 1 be approved, prior to its presentation at Cabinet on the 16th October 2019.

## **7. CORPORATE RISK REGISTER MONITORING (Q1) 2019/20**

The Interim Head of Business Improvement Services and Acting Section 151 Officer presented the report which updated Members on the Corporate Risk Register in accordance with the Council's Risk Management Strategy. The purpose of the report is to allow the Audit Committee an opportunity to satisfy itself that appropriate arrangements are in place for the Council's risk management processes to be regularly and robustly monitored and scrutinised. The report also provided an update on changes being made to the overall Performance Reporting Framework through the introduction of Directorate Performance Assessments (DPA's).

Members were advised that under the Council's Risk Management Strategy, the Corporate Management Team (CMT) own, manage, monitor and review the Council's Corporate Risks on a quarterly basis, with six monthly progress reports being presented to Cabinet. The Corporate Risk Register is a 'living document'. Updates are also provided to the Audit Committee, which has the role of reviewing and challenging the Corporate Risk Register and where relevant, resultant action plans for the Council's key strategic and corporate risks. The report focuses on the CMT update as of 30th September 2019.

The Chair thanked the Officer for their report and Members comments were welcomed.

A Member referred to paragraph 5.3 in the report which relates to 'people data such as sickness information' that will be included in the DPA's and questioned if categories for sickness absences are broken down. Officers advised that there are a number of categories linked to sickness absence and further details could be obtained from HR. and distributed following the meeting. Assurances were sought that measures are in place for supporting the wellbeing of staff and Officers advised that work is ongoing with People Services in establishing a Wellbeing Strategy in moving forward.

Members discussed the risks, opportunities and impact of topics within each of the Council's Directorates, as set out in appendix 1. Particular reference was made to the topic of Climate Change. The Committee expressed their concerns as to the current Risk Level for 2019-20 Q1 (Medium) and felt that the Risk level should be increased to Red. Following consideration and discussion and subject to the foregoing, it was moved and seconded that the recommendation in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that the content of the Corporate Risk Register and associated mitigating actions, be supported.

## **8. PROPOSED REPORTING PROTOCOL IN RESPECT OF COMPLETED AUDIT REVIEWS AND RECOMMENDATION TRACKING**

The Internal Audit Manager introduced the report which presented Members with an amended process that will better allow the Committee to support the work of Internal Audit Services and focus on the higher risk issues that need to be addressed.

Members were reminded that at its meeting on the 16th October 2018, the Audit Committee endorsed a new protocol in respect of the reporting of completed audit reviews. It was explained that the introduction of the protocol has identified some operational issues that require fine tuning. This will ensure that the intended outcomes from the auditing process are achieved and Audit Committee time is focussed on the right areas. The timing of invitations to Heads of Service/Head Teachers to attend the Audit Committee must allow time for the agreed action plan to run its course and for an audit follow up assessment to be made. A rolling monitoring report will develop which will aid the Audit Committee to focus on those service areas that most need attention.

The Chair thanked the Officer for their report and Members comments were welcomed.

Members discussed the protocol and sought clarification in respect of the mechanisms involved with the process. It was explained that Internal Audit Services has always had a facility, via the Section 151 Officer, to request Heads of Service to attend the Audit Committee to answer questions or provide explanations. The revised process is intended to bring several strands of audit reporting together to address a number of recommendations made by the external auditor. A formal agreed procedure will provide more timely and more focused information to the Audit Committee and better support to Internal Audit Services.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that the revised Protocol set out in this report, be agreed.

## **9. INTERNAL AUDIT SERVICES - MID YEAR PROGRESS REPORT**

The Internal Audit Services Manager presented the report which provided Members with an overview of the work undertaken by Internal Audit Services during the first six months of the current financial year.

Members were advised that whilst undertaking the audit of the financial statements for 2017-18, External Audit recommended audit reports issued by Internal Audit Services be presented to the Audit Committee in a tabular format. This will set out the rating given to each review and the number of recommendations made. For those reports that contain high risk recommendations, a brief indication of the issues identified will also be provided. The updated format will form the basis of future progress reports to the Committee and will be used to enable Members to track the implementation of recommendations over time.

The Officer referred to Tables 1, 2 and 3 set out in paragraphs 5.7 to 5.10 in the report. Table 1 forms the basis of ongoing performance reporting and sets out the high risk areas identified in the current period. Table 2 provides an update on the audit reviews completed and reported in previous periods. Table 3 provides the Committee with an indication of some of the topics currently being worked on by internal audit staff and will in future periods be reported within Table 1, once completed. It was noted that this is a transitional report and the revised format of reporting will be under constant review in the coming months. This will ensure the intended purpose is achieved and the content, style and clarity is suitable for the Audit Committee. Members then discussed the high risk areas identified in the current period



for each individual audits, which included some Primary Schools, Day Centres and a Tourist Information Centre.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that the content of the report, be noted.

## **10. 2016/18 NATIONAL FRAUD INITIATIVE UPDATE**

The Audit Group Manager delivered the report which informed Members of the work carried out by Internal Audit staff on the 2016/18 National Fraud Initiative (NFI). She explained that every two years the National Fraud Initiative matches data across Public Sector organisations and systems in the UK in order to help public bodies identify potentially fraudulent claims, payment errors and other erroneous payments or frauds. The results of the NFI exercise were published by the Wales Audit Office in October 2018 and the full document is available on the Members' portal. The latest biennial national counter fraud exercise has helped Welsh Public bodies identify £5.4 million of fraud and erroneous payments.

Members noted that In respect of the work undertaken for Caerphilly County CBC, excluding Council Tax Single Person Discount matches, there were 6,242 individual data matches reported. The exercise returned circa 100 match reports. Following investigations by Internal Audit an amount of £92,684 was identified as fraud or error and action is being taken to recover these sums. £78,472 was already recovered by the time the exercise was concluded and work is continuing in respect of the remaining amount. The process also matches other data such as concessionary bus passes, blue badges and residents parking permits where there is an indirect effect on public funds, so the results reported for CCBC do not include an estimation of these values.

The Officer advised that a different process is now employed within Council Tax to investigate Single Persons Discount issues, details of which are set out in paragraph 2.5 in the report. Due to the separate nature of the 2 NFI matching processes the figure is reported separately within the report.

Members then discussed the breakdown of results that had been recorded as at the 31st October 2018 (since 2015). These included frauds identified which were under investigation and errors identified with a total value of £92, 684. A Member requested further information in respect of Creditor Payment Errors. The Officer advised that the figure quoted included duplicated payments and other payment errors made by council staff and this can be addressed by ensuring good practice in moving forward. She gave an example of Purchase Ledger and confirmed that the information inputted must be identical otherwise the system will not recognise the contact. Emphasis was placed on the importance of detecting and preventing false matches and it was noted that the majority of payments have now been recovered due to the new technology in place.

The Chair thanked the Officer for their report.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that the content of the report, be noted.

## **11. COUNTER FRAUD ARRANGEMENTS IN THE WELSH PUBLIC SECTOR – PUBLICATION BY THE WALES AUDIT OFFICE**

The Audit Group Manager introduced the report that provided details of a recent publication by the Wales Audit Office in respect of the counter-fraud landscape across the Welsh public sector. This follows the publication of the 2018 National Fraud Initiative report which provided some insight into aspects of public sector fraud in Wales but does not provide a robust evaluation of the underlying arrangements for prevention and detection. This latest publication describes the allocation of resources, collaboration between organisations, scrutiny arrangements and overall impact.

Members were pleased to note that Welsh Government (WG) had requested Caerphilly CBC to take part in the pilot exercise and in response Officers provided answers to a set of standard questions to WG.

In response to a Members question, the Officer advised that Caerphilly does not have its own Fraud Team, however there is a link Officer that feeds information back and is a point of contact for queries..

The Chair thanked the Officer for her report and for responding to questions raised.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that the content of the report, be noted.

## **12. INFORMATION ITEMS (Agenda items 11- 15):**

The Committee received and noted the following information items:-

- (i) Register of Employees' Interests Forms 2018/19.
- (ii) Officers Declarations of Gifts and Hospitality April to June 2019.
- (iii) Certificate of Compliance for the Audit of CCBC 2019-20.
- (iv) Regulation of Investigatory Powers Act 2000.
- (v) Final Audit of Financial Statements Report for 2018/19.

The meeting closed at 3.40 pm.

Approved as a correct record and subject to any amendments or corrections agreed and recorded in the minutes of the meeting held on 28th January 2020, they were signed by the Chair.

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CHAIR

Forward Work Programme - Audit

Date	Title	Key Issues	Author	Cabinet Member
28/01/20 14:00	Pension Fund Actuary	To provide an update on the latest triennial report of the Fund Actuary.		Cllr. Stenner, Eluned;
28/01/20 14:00	Certification of Grants and Returns 2018-19	The Report summarises the results of work on the certification of the Council's 2018-19 Grant Claims and Returns.		Cllr. Stenner, Eluned;
28/01/20 14:00	Regulator Proposals for Improvement Progress Update	To advise the Committee that reports from Regulator's are coming through the system and what proposals for improvement or recommendations are being made.	Roberts, Ros;	Cllr. Stenner, Eluned;
28/01/20 14:00	Corporate Risk Register Update	To update the Committee on the Council's high level risk register so there is assurance the risk process is being managed effectively at the highest level.	Roberts, Ros;	Cllr. Stenner, Eluned;
28/01/20 14:05	Regulation of Investigatory Powers Act 2000 - Information Item	To advise the Committee of the numbers of covert surveillance operations undertaken by the Council in accordance with the provisions of the Regulation of Investigatory Powers Act 2000.	Lane, Lisa;	Cllr. Stenner, Eluned;
28/01/20 14:05	Officers Declarations of Gifts and Hospitality - Information Item.	To provide the Committee with information regarding the Register of Employees' Interests Forms completed by Officers (excluding Schools) regarding Gifts and Hospitality for the last quarter and a comparison with the previous three quarters.	Donovan, Lynne;	Cllr. Stenner, Eluned;
28/01/20 14:05	Corporate Complaints (6 Month Update) September 2019.	To provide Members with an update on the number of complaints received under the Corporate Complaints Policy for the period 1st April 2019 to the 30th September 2019.	Lane, Lisa;	Cllr. Stenner, Eluned;
28/01/20 14:05	Corporate Governance Review Panel Minutes - 24th September 2019 - Information Item		Harris, Richard M;	Cllr. Stenner, Eluned;
28/01/20 14:05	Caerphilly Certificate of Compliance - Audit of Caerphilly County Borough Councils' Assessment of 2018-19 Performance. - Information Item.	To advise the Committee that the Council has received its statutory certificate of compliance in regard to its performance duties.	Harris, Stephen R;#21	Cllr. Stenner, Eluned;
28/01/20 14:05	Corporate Safeguarding Review Report - Information Item.	To advise the Committee of the Wales Audit Office (WAO) Review of Corporate Safeguarding Arrangements within Caerphilly County Borough Council undertaken in May 2019.	Jenkins, Gareth;	Cllr. Stenner, Eluned;

21/04/20 14:00	Internal Audit Plan for 2020/21	To provide the Committee with an update on the Internal Audit Plan for 2020/21.	Harris, Richard M;	Cllr. Stenner, Eluned;
21/04/20 14:00	Directorate Performance Assessments	To provide the Committee with an update as to the progress of the Directorate Performance Assessments.	Roberts, Ros;	Cllr. Stenner, Eluned;
21/04/20 14:00	External Audit Plan 2020/21	Presented by External Auditors - Grant Thornton.	Harris, Stephen R;	Cllr. Stenner, Eluned;
21/04/20 14:05	Regulation of Investigatory Powers Act 2000 - Information Item.	To advise the Committee of the numbers of the covert surveillance operations undertaken by the Council in accordance with the provisions of the Regulation of Investigatory Powers Act 2000.	Lane, Lisa;	Cllr. Stenner, Eluned;
21/04/20 14:05	Officers Declarations of Gifts and Hospitality - Information Item.	To provide the Committee with the information regarding the Register of Employees Interest Forms' completed by Officers of the Council (excluding Schools) regarding Gifts and Hospitality for the last quarter and a comparison of the previous three months.	Donovan, Lynne;	Cllr. Stenner, Eluned;
21/04/20 14:05	Recent Corporate Governance Panel Minutes. - Information Item		Harris, Richard M;	Cllr. Stenner, Eluned;
09/06/20 14:00	Regulator Proposals for Improvement Update.	To advise the Committee of which reports from the Regulator's are coming through the system and what proposals for improvement or recommendations are being made by the regulators from those reports.	Roberts, Ros;	Cllr. Stenner, Eluned;
09/06/20 14:00	Draft Annual Governance Statement		Harris, Richard M;	Cllr. Stenner, Eluned;
09/06/20 14:00	Corporate Risk Register	To update the Committee on the Council high level risk register so there is assurance the risk process is being managed effectively at the highest level.	Roberts, Ros;	Cllr. Stenner, Eluned;
09/06/20 14:00	Internal Audit Services Annual Report 2019/20.	To provide the Committee with an update on the Internal Audit Annual Report.	Harris, Richard M;	Cllr. Stenner, Eluned;
09/06/20 14:05	Officers Declarations of Gifts and Hospitality	To provide the Committee with the information regarding the Register of Employees' Interests Forms completed by Officer of the Council (excluding Schools) regarding Gifts and Hospitality for the last quarter and a comparison with the previous three quarters.	Donovan, Lynne;	Cllr. Stenner, Eluned;
09/06/20 14:05	Annual Review of Complaints Received under the Council's Corporate Complaints Policy	To provide the Committee with an annual update in relation to the Corporate Complaints received.	Lane, Lisa;	Cllr. Stenner, Eluned;
09/06/20 14:05	Recent Corporate Governance Panel Minutes.		Harris, Richard M;	Cllr. Stenner, Eluned;

09/06/20 14:05	Regulation of Investigatory Powers Act 2000	To advise the Committee of the numbers of covert surveillance operations undertaken by the Council in accordance with the provisions of the Regulation of Investigatory Powers Act 2000.	Lane, Lisa;	Cllr. Stenner, Eluned;
21/07/20 14:00	Local Government Financial Statements and Role of the External Auditor - Presentation		Harris, Stephen R;	Cllr. Stenner, Eluned;
21/07/20 14:00	Audit Committee Assurance over Management Processes and Arrangements		Harris, Stephen R;	Cllr. Stenner, Eluned;
21/07/20 14:00	Financial Settlements for 2019/20.		Harris, Stephen R;	Cllr. Stenner, Eluned;
13/10/20 14:00	WAO Annual Improvement Report 2019/20	External Report.		
13/10/20 14:00	Internal Audit Services Mid-Year Progress Update.	To provide Members with an update on Internal Audit Mid-Year progress.	Harris, Richard M;	Cllr. Stenner, Eluned;
13/10/20 14:05	Regulation of Investigatory Powers Act 2000	To advise the Committee of the numbers of covert surveillance operations undertaken by the Council in accordance with the provisions of the Regulations of Investigatory Powers Act 2000.	Lane, Lisa;	Cllr. Stenner, Eluned;
13/10/20 14:05	Officers Declarations of Gifts and Hospitality.	To advise the Committee with the information regarding the Register of Employees' Interest Forms completed by Officers of the Council (excluding Schools) regarding Gifts and Hospitality for the last quarter and a comparison with the previous three quarters.	Donovan, Lynne;	Cllr. Stenner, Eluned;
13/10/20 14:05	Certificate of Compliance for the Audit of CCBC 2019-20		Harris, Stephen R;	Cllr. Stenner, Eluned;
13/10/20 14:05	Final Audit of Financial Statements Report for 2020/21.	External Auditor to present report.	Harris, Stephen R;	Cllr. Stenner, Eluned;
13/10/20 14:05	Recent Corporate Governance Minutes.		Harris, Richard M;	Cllr. Stenner, Eluned;

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WALES AUDIT OFFICE  
SWYDDFA ARCHWILIO CYMRU

# Certification of Grants and Returns 2018-19

## Caerphilly County Borough Council

Audit year: 2018-19

Date issued: December 2019

Document reference: CCBCCERT201819

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Agenda Item 6

This document has been prepared as part of work performed in accordance with statutory functions.

In the event of receiving a request for information to which this document may be relevant, attention is drawn to the Code of Practice issued under section 45 of the Freedom of Information Act 2000. The section 45 code sets out the practice in the handling of requests that is expected of public authorities, including consultation with relevant third parties. In relation to this document, the Auditor General for Wales and the Wales Audit Office are relevant third parties. Any enquiries regarding disclosure or re-use of this document should be sent to the Wales Audit Office at [infoofficer@audit.wales](mailto:infoofficer@audit.wales).

The team who delivered the work comprised Barrie Morris (Engagement Lead) and Grace Hawkins (Manager).



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## Summary report

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# Summary

- 1 Under Paragraph 20 of Schedule 8 to the Government of Wales Act 2006 the Auditor General shall, if required by a local government or other public body, make arrangements for certifying claims and returns (referred to as claims, hereafter).
- 2 We undertook our work with the aim of certifying individual claims and to answer the question:  
'Does Caerphilly County Borough Council (the Council) have satisfactory arrangements in place to ensure the production of co-ordinated, accurate, timely and properly documented grant claims?'
- 3 We have completed our certification work and conclude that while the Council had adequate arrangements in place for the submission of its claims, there is scope for improvement. We are continuing to work with the Council to support these improvements in 2019-20. For 2018-19 we certified 11 grant claims and returns. (10 in 2017-18). The Council submitted 91% of its 2018-19 grant claims to us on time. We can confirm that we have certified all the claims, at a total audit cost of £45,845 (£41,788 for 2017-18).

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## Exhibit 1: Breakdown of claims

	£
Additional Grant to CCBC	0
Grant to be Clawed back from CCBC	0
Disclosure Adjustments	See exhibit 5 for details

- 5 The proportion of claims that were qualified is 2:11 which compares favourably with the long-term Welsh average of 1:4 for 2017-18, the most recent years for which all-Wales data is available.

# Summary of certification work outcomes

<b>Introduction and background</b>	<p><b>This report summarises the results of work on the certification of the Council's 2018-19 grant claims and returns</b></p> <ul style="list-style-type: none"> <li>• As contractors to the Wales Audit Office we are asked, on behalf of the Auditor General, to certify grant claims made by the Council.</li> <li>• We certified 11 claims with a total value of £150,868,841.</li> <li>• We have produced this report to provide collective feedback to those officers having the responsibility for grant management so that we can work together to identify further improvements in claim preparation.</li> </ul>
<b>Timely receipt of claims</b>	<p>Our analysis shows that 91% per cent of claims given to us during the year were received by the deadline set for the Council in terms and conditions.</p>
<b>Certification results</b>	<p><b>We issued unqualified certificates for 9 claims and returns but a qualification was necessary in 2 cases (18 per cent).</b> The reasons for qualifying the claim can be found in <a href="#">Exhibit 5</a>.</p>
<b>Audit adjustments</b>	<p><b>Adjustments were necessary to 2 (18 per cent) of the Council's claims as a result of our work this year.</b> The adjustments were disclosure in nature and had no impact in the grant payable to the Council.</p>
<b>The Council's arrangements</b>	<p><b>The Authority has adequate arrangements for preparing its grants and returns and supporting our certification work but improvements are required in some areas, as detailed in the body of this report.</b></p>
<b>Fees</b>	<p><b>Our overall fee for certification of grants and returns for 2018-19 is £45,845 (£41,788 in 2017-18).</b></p>

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- 6 The following page provides a summary of the key outcomes from our certification work on the Council's 2018-19 claims and returns, showing where either audit amendments were made or where we had to qualify our auditor certificate.
- 7 A qualification means that issues were identified concerning the Council's compliance with a scheme's requirements that could not be resolved through adjustment. In these circumstances, it is likely that the relevant grant-paying body will require further information from the Council to satisfy itself that the full amounts of grant claimed are appropriate.

Exhibit 3: Key information for 2018-19

**Key information for 2018-19**

**Overall, we certified 11 grants and returns:**

4 were error free

2 were qualified

2 required amendment to the final figures

3 were unqualified but required the issue of a certification feedback note

Exhibit 4: Summary of Key Outcomes

Ref	Grants and returns	Claim due	Claim received	Late	Qualified certificate	Adjustment (>£10,000)	Adjustment (<£10,000)	Unqualified certificate
BEN01	Housing Benefits and Authority Tax Subsidy	30/04/2019	25/04/2019	No	Yes			
TRA15	Local Transport Grant	30/09/2018	24/09/2019	No				Yes
LA12	Sustainable Waste Management	30/09/2019	26/09/2019	No				Yes
EDU18	21st Century Schools	30/09/2019	26/09/2019	No				Yes
LA01	Non-Domestic Rate	31/05/2019	31/05/2019	No				Yes
HLG01	Gwent Frailty Partnership	19/04/2019	23/04/2019	Yes	Yes			
HLG03	Section 28a Annual Voucher - Wanless	30/09/2019	26/06/2019	No				Yes
HLG03	Section 28a Annual Voucher - Learning and Disability	30/09/2019	26/06/2019	No				Yes
PEN05	Teachers Pensions	30/06/2019	03/06/2019	No			Disclosure	Yes
LA99	Summary of Certified Welsh Government Grants	30/09/2019	30/09/2019	No				Yes
TRA23	Free Concessionary Travel	30/09/2019	24/09/2019	No			Disclosure	Yes

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This table summarises the key issues behind each of the adjustments or qualifications that were made.

Exhibit 5: Summary of Key Issues

Ref	Summary observations	Amendment Financial Impact
1	<p><b><u>Housing Benefit and Authority Tax Subsidy</u></b></p> <p>A number of issues were identified, which resulted in a qualification, including:</p> <p><b><u>Rent Allowances</u></b></p> <ul style="list-style-type: none"> <li>• Rent Rebates - Total Expenditure (Benefit Granted) – this is an error that has also been identified in prior years, where the average weekly income was calculated incorrectly, this led to an extrapolated overstatement of £464.09 with a corresponding understatement in cell 113.</li> <li>• Rent Rebates – Total Expenditure (Benefit Granted) – state retirement pension was uprated at a standard rate of 3%, however not all elements had risen by 3% therefore the error resulted in underpaid benefit.</li> <li>• Modified Schemes Subsidy - Expenditure due to voluntary disregarding of War Disablement or War Widow’s Pension –testing identified that the authority miscalculated and overstated the claimant’s pension resulting in an underpayment of benefit.</li> </ul>	£0 (disclosure only)
2	<p><b><u>Teacher’s Pension Return</u></b></p> <p>An error in the data collection spreadsheet caused several variances between percentage tiers. This resulted in amendments to the claim form, however this had no impact on the total of the return.</p>	£0 (disclosure only)
3	<p><b><u>Free Concessionary Travel</u></b></p> <p>One amendment of £40.00 made to the original claim form due to a transposition error.</p>	£0 (disclosure only)
	<b>Total effect of amendments to the Council’s claims and returns</b>	<b>£0</b>

# Recommendations

- 8 We have given each recommendation a risk rating and agreed what action management will need to take. We will follow up this recommendation during next year's audit.

## Exhibit 6: Recommendations' Risk Rating

Priority 1	Priority 2	Priority 3
<p>Issues that are fundamental and material to your overall arrangements for managing grants and returns or compliance with scheme requirements. We believe that these issues might mean that you do not meet a grant scheme requirement or reduce (mitigate) a risk.</p>	<p>Issues that have an important effect on your arrangements for managing grants and returns or complying with scheme requirements, but do not need immediate action. You may still meet scheme requirements in full or in part or reduce (mitigate) a risk adequately but the weakness remains in the system.</p>	<p>Issues that would, if corrected, improve your arrangements for managing grants and returns or compliance with scheme requirements in general, but are not vital to the overall system. These are generally issues of best practice that we feel would benefit you if you introduced them.</p>

Exhibit 7: Recommendations

Issue	Implication	Recommendation	Priority	Comment	Responsible officer and target date
Unapproved / ineligible expenditure included – Housing Benefit	The Authority's subsidy claim may be qualified. This will lead to a partial loss of subsidy if the total error made exceeds a permitted threshold set by the Department for Work and Pensions. If overpayments are not classified correctly, the Authority will not realise the level of its total error. Some claimants will be overpaid, and the Authority may have to request a repayment.	<p>One issue identified within the qualification letter has been recurring for a number of years.</p> <p>We recommend that the council implement training to address the following issues prior to the next certification process:</p> <ul style="list-style-type: none"> <li>• correctly calculate the weekly income of a claimant with a focus on what pay elements are included and excluded.</li> </ul>	1	<p><i>We will continue to deliver refresher training and maximise our quality control checks on related claims to ensure that claimants' weekly income is correctly calculated and entered on the processing system. This will mitigate these types of errors reoccurring in future. We will also carry out 100% checks on all claims that attract Modified Scheme Subsidy to safeguard against errors in this category happening again.</i></p> <p><i>With reference to the classification of overpayments, although errors had been identified in previous years, extra testing this year found no errors and this issue has now been closed with regards to future 'Cumulative Audit Knowledge and Experience' (CAKE) testing. This is a marked improvement and we will endeavour to maintain this standard.</i></p> <p><i>In addition, CAKE testing was also carried out on the calculation of rent liability and no further errors were identified in this field. This indicates added improvement and this issue has also been closed with regards to future testing.</i></p>	<p>Amanda Main (Housing &amp; Council Tax Benefits Manager)</p> <p>Immediate Effect</p>



# Fees

Our overall fee for the certification of grants and returns was £45,845.

## Exhibit 8: Fees

Breakdown of fee by grant/return	2018-19	2017-18
Housing Benefit and Authority Tax Subsidy (BEN01)	£18,724	£18,090
Teachers' Pension (PEN05)	£3,045	£2,920
Free Concessionary Travel (TRA23)	£2,480	£1,279
Section 28a Annual Voucher - Wanless (HLG03)	£1,449	£1,363
Section 28a Annual Voucher - Learning and Disability (HLG03)	£1,449	£1,363
21st Century Schools (EDU18)	£1,954	£1,773
Sustainable Waste Management (LA12)	£3,319	N/A
Communities First - All Clusters (RG03)	N/A	£2,904
Non-Domestic Rate (LA01)	£2,563	£2,570
Local Transport Grant (TRA15)	£1,459	£1,111
Gwent Frailty Partnership (HLG01)	£2,004	£1,688
Single Statement (LA99)	£4,098	£3,945
Planning, admin & reporting	£3,301	£2,782
<b>Total fee</b>	<b>£45,845</b>	<b>£41,788</b>

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## AUDIT COMMITTEE – 28<sup>TH</sup> JANUARY 2020

**SUBJECT: REGULATOR PROPOSALS FOR IMPROVEMENT PROGRESS UPDATE**

**REPORT BY: DIRECTOR OF EDUCATION & CORPORATE SERVICES**

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### **1. PURPOSE OF REPORT**

- 1.1 The purpose of this report is to update members on progress against proposals or recommendations made by all regulators since the last Audit Committee update (January 2019) and to advise on any new proposals that have been added since that time.

### **2. SUMMARY**

- 2.1 Since June 2019 there has been 5 new recommendations added onto the register.
- 2.2 Currently we have **5** statutory recommendations, **10** proposals and **5** areas for improvement on the register totalling **20** altogether. There are **9** proposals and recommendations which are now considered to be actioned and completed. If agreed by the Audit Committee, that would leave **11** outstanding.
- 2.3 We have received 3 reports since the last time an update was provided, but only 1 has been put on the register as the other two are still to be formalised and presented to their relevant scrutiny. They are:
- Corporate Safeguarding arrangements for Children Services (on the register).
  - The Well-being of Future Generations 'Steps' examination on 'Preventing unnecessary admissions to hospital and facilitating timely discharges' which is part of the Wales Audit Office (WAO) work on how public bodies are implementing the Well-being of Future Generations Act (Wales) 2015.
  - Environmental Health – Follow up review.
- 2.4 For clarity, the WAO issue Proposals and Recommendations. The difference between the two is that a proposal is a 'suggestion for improvement'. This means the Authority does not have to act on it, but if it is on the register it has been agreed that we will. A 'recommendation' is statutory which means we have a 'statutory duty' to act on the recommendation. Areas for Improvement are a new category as noted in para 2.2 and looks at how we have used the Sustainable Development principle in forming actions to deliver the Well-being Objectives. They do not have specific proposals, but rather identify areas for improvement.

### 3. RECOMMENDATIONS

- 3.1 We recommend the 9 proposals and recommendations be closed down as completed and encourage members to view the specific proposals attached within Appendix A and judge if they concur that these are now complete. It is recommended that Audit Committee give their agreement (if appropriate) to close the proposals that are noted as 'recommended as completed' within Appendix A.

### 4. REASONS FOR THE RECOMMENDATIONS

- 4.1 To ensure members are aware of progress the Council's actions for progressing regulator recommendations and proposals and have assurance that progress is being made through an opportunity to monitor and challenge content.

### 5. THE REPORT

- 5.1 As of January 2020 there are 11 proposals/areas for improvement outstanding, 5 of these are new recommendations. We are recommending 9 be closed down as completed leaving 11 outstanding. See breakdown below:

Name of Report	How many proposals / recommendation outstanding	How many completed in this reporting period	How many left?
Asset Management	1	0	1
Financial Resilience	1	0	1
Review of arrangement to address external audit inspection	1	0	1
Savings planning (Financial Resilience)	1	1	0
Overview Scrutiny Fit for the Future?	2	2	0
Service User Perspective Review	1	1	0
Welsh Housing Quality Standard Follow up Review	3	2	1
Well-being of Future Generations 'steps' examination of 'improve the take up of Flying Start'	5 improvement actions	0	5
Corporate Safeguarding – Children Services	5 <b>New</b>	3	2
	<b>20</b>	<b>9</b>	<b>11</b>

- 5.2. **Asset Management** – This proposal is a long term activity requiring each service to develop a Service Asset Management Plan (SAMP). As noted in an earlier report, Property Services appointed an Asset Management Officer to work with services on a two year fixed term basis to develop SAMPs (Appendix A). Good progress has been made with 14 of 22 SAMPs finished and several more almost ready to be signed off; we are confident all SAMPs and therefore this proposal will be finished this year. SAMPs then will become part of normal day to day business and will help the Council manage its property assets.
- 5.3 **Financial Resilience and Review of arrangement to address external audit Inspection** – the Financial Resilience proposal is almost complete with a set of dates early in the year for a ‘Commercial Strategy’ to be approved. This means the action will be complete by the next Audit update in June 2020. The Organisational Development Strategy was not completed by January 2020, however as noted in the appendix an appointment has been made to progress the completion of the strategy this year. With an officer now in place the draft Workforce Development Strategy will be consulted upon by Summer 2020.
- 5.4 **Overview Scrutiny Fit for the Future?** This came on to the register in July 2018 and had made good progress so we now recommend that this is complete.
- 5.5 **Service User Perspective Review** was a survey carried out with housing tenants and the **Welsh Housing Quality Standard Follow up** review came onto the register January 2019. Both are making good progress with only 1 action now outstanding.
- 5.6 **Well-being of Future Generations** ‘steps’ examination of ‘improve the take up of Flying Start’ was published in April 2019. This work was to identify how the Sustainable Development Principle (the five ways of working) was used in developing actions to address our Well-being Objectives. Although in terms of counting we have noted 5 areas for improvement, there are at least 12 activities addressing these 5 so the work is more detailed than 5 areas would suggest. Good progress has been made on these actions and all are on track to be completed by the target dates.
- 5.7 **New - Corporate Safeguarding** is a new report received in June 2019 and was presented to Social Services Scrutiny on 22<sup>nd</sup> October 2019 with the full management response. Very good progress has been made with 3 of the 5 recommendations being completed and the remaining 2 between 50% and 80% completed. These were categorised as ‘recommendations’ because although WAO assessed safeguarding locally it was against a national review held in 2016 in which national recommendations were made across Wales at that time.
- 5.8 **New** - There are two new reports coming through the system that are not yet noted on the register; the first one is: **Follow up on Environmental Services** (Nov 2019). The report has been finalised but still needs to be presented to committee by the Wales Audit Office. The overall summary is that the *“Council has acted upon the recommendations raised in 2014. The Council should use its strong financial position to explore more innovative ways in which it can ensure the long-term financial and operational sustainability of environmental health services, whilst contributing to the Council’s wider strategic objectives”* and there are 2 proposals accordingly. Actions to respond to these proposals will be on the next register update.
- 5.9 The second new report is the **Well being of Future Generations Steps 2** ‘preventing unnecessary admissions to hospital and facilitating timely discharges’. This new report (received November 2019) and has not yet been presented to Scrutiny. An action plan has been developed to address the areas for development.

There are 6 identified improvement actions although the action plan shows 11 activities. The reason for this is that actions are grouped under the 5 ways of working and some actions address more than one of the 5 ways of working, so are repeated. The action progress will be updated in more detail the next Audit report.

- 5.10 The Education Service have reviewed all recommendations from 2014 inspection when the local authority came out of monitoring, and we are currently awaiting the next Estyn inspection, therefore there are no proposals or recommendations to advise of at this time.
- 5.11 Social Services advise there are no Care Inspectorate Wales (CIW) reports or studies to report on at this time, although to note CIW will be doing some work in Adults and Children's in the next two months.

### **Conclusion**

- 5.12 In the main most proposals are making good progress and there are no emerging issues or delays to report on at this time.

When monitoring progress against the proposals, members are advised to consider what value the proposals are making and what difference the activity in addressing them has made for our citizens. The WAO view is that the decision on whether a proposal is completed is an internal matter for the organisation to decide, (although it is within their remit to make more proposals if they do not believe it has been addressed). WAO receive this update as part of their attendance at Audit Committee.

## **6. ASSUMPTIONS**

- 6.1 Progress of the proposals assumes there is no known slippage at this time and that the resources to deliver them remain unchanged.

## **7. LINKS TO RELEVANT COUNCIL POLICIES**

### **7.1 Corporate Plan 2018-2023.**

The Steps Examination Areas for Improvement looks at Flying Start which is an important part of the early year section in Objective 1 - Improve education opportunities for all

The Steps Examination Area for Improvement which is noted in 5.9 is an assessment of the Well-being Objective 6 – Support citizens to remain independent and improve their well-being.

The Corporate Plan can be found on the intranet on the Policy portal, within the performance management section. See link below:

<http://sc-aptken1/KENTICO/getattachment/ab780120-3a2b-47f9-bff0-f383462fbb98/Corporate-Plan-2018-23.aspx>

## **8. WELL-BEING OF FUTURE GENERATIONS**

- 8.1 There are no specific implications to the Well-being of Future Generations within this report, however some proposals are a result of the WAO review of our compliance

with the Well-being of Future Generations (Wales) Act 2015. The proposals as noted in section 5.1 also relate to two of the Well-being Objectives that the Council has set itself to improve well-being. The Corporate Plan as noted shows which national goals our Well-being objectives maximise our contribution towards.

- 8.2 The five ways of working will be included within the actions to address these proposals and are not specific to the proposals themselves, with the exception of the last proposals as they were a direct review of how we applied the five ways of working to set our objective and actions (or steps) to deliver the objective.

## **9. EQUALITIES IMPLICATIONS**

- 9.1 No specific Equalities Impact Assessment has been undertaken on this report, however the Local Government Measure 2009 cites fairness and accessibility as part of the definition of what 'Improvement' means and the Well-being Objectives which are part of the Corporate Plan (link in paragraph 7.1) contribute to a More Equal Wales.

## **10. FINANCIAL IMPLICATIONS**

- 10.1 There are no financial implications arising from this report, although of note external audit fees can be reduced if regulators are assured that they can place reliance on the organisation's own ability to monitor and challenge itself to improve

## **11. PERSONNEL IMPLICATIONS**

- 11.1 There are no personnel implications arising from this report

## **12. CONSULTATIONS**

- 12.1 This report has been sent to the Consultees listed below and all comments received are reflected in this report

## **13. STATUTORY POWER**

- 13.1 Local Government Measure (Wales) 2009

Author: Ros Roberts, Business Improvement Manager [roberr@caerphilly.gov.uk](mailto:roberr@caerphilly.gov.uk)

Consultees: Christina HARRY, Interim Chief Executive  
Richard Edmunds, Corporate Director for Education & Corporate Services  
Steve Harris, Interim Head of Business Improvement  
Cllr. Eluned Stenner, Cabinet Member for Finance, Performance & Planning  
Mark Williams, Interim Head of Property Services  
Lynne Donovan, Head of People Services  
Gareth Jenkins, Assistant Director, Childrens Services

Jo Williams, Assistant Director, Adult Services  
Cath Forbes, Thompson, Scrutiny Manager  
Rob Tranter, Head of Legal Services  
Shaun Couzens, Chief Housing Officer  
Paul Smythe, Housing Technical Manager  
Sarah Mutch, Early Years Manager  
Keri Cole, Chief Education Officer  
Kathryn Peters, Corporate Policy Manager  
Anwen Cullinane, Senior Policy Officer Equalities and Welsh Language

Background

Appendices:

Appendix A: Action Plan 2020 Response to Regulator Proposals



## Action Plan 2020 Response to Regulator Proposals

Number and reference of action	Name of Report	Regulator Proposal	Action	PREVIOUS UPDATE	Service Officer Responsible	When will be completed by	CURRENT UPDATE - JANUARY 2020	Status	Percentage completed
46	Asset Management (Land and Property) Strategy Review (September 2013)	<b>P2:</b> Ensure that the individual service asset management plans are developed as soon as possible and are used to inform the Council's financial planning process.	Develop Service Asset Management Plan (SAMP) and consider impact on the Medium Term Financial Plan (MTFP)	The Asset Management (Land and Property Strategy has been updated and taken to Cabinet May 19 for Approval. The following services have had their asset management plans completed by the Property department and are with services for sign off. They are; Corporate Offices Adult Education and Youth Service Housing Countryside Library Services Infrastructure In the following weeks draft versions of Cemeteries, Allotments and Amenity Sites are due to be completed.	Mark Williams	Jan-Mar '14 (change of completion date to March 2018 due to number of reviews that affect the outcome). Date changed to March 2020 see update	There are 22 SAMPS and 14 SAMPS have now been completed. The remaining 8 are in various stages of completion between 25%-75%. It is anticipated the proposal will be completed later this year as those that are due to be completed are signed off. After this the monitoring of the SAMPS will then move into day to day business.	In progress	90%
181A2016	Financial Resilience 2015/2016 issued April 2016	<b>P1</b> Developing income generation/charging policies.	A corporate policy on income generation/charging will be progressed once the WAO produces a final national report on its "All Wales Local Government Improvement Study: Strategic approach to income generation and charging".	The Strategic Action Plan for the #TeamCaerphilly - Better Together includes an action to develop a Commercial and Investment Strategy for Cabinet approval by the end of October 2019. After this time we will be a position to close this proposal for improvement.	Stephen Harris	01/04/2017 (changed) July 17	A Commercial Strategy has been drafted and a workshop was held with the Policy & Resources Scrutiny Committee on 14th January 2020. The draft Strategy will be presented to the Team Caerphilly Programme Board on the 6th February 2020 and will then be presented to Policy & Resources Scrutiny and Cabinet for formal approval.	In progress	75%
344A2016 (Audit year 15/16) Issued May 2016 / reported August 16 Page 29	Review of arrangements to address external audit, inspection and regulation and proposals for improvement.	<b>P1</b> As the Council develops its vision and considers the future shape of the organisation, it should identify and plan for the workforce requirements to implement its vision.	Develop Staff Vision and Values to complement Cabinet Commitments. Research and Develop a holistic organisational development plan, that includes age profiling, re-skilling and potential apprenticeships. This would include supporting agile working policy and practise.	The Transformation Strategy #TeamCaerphilly 'Better Together' which is scheduled to go to Cabinet 12 June 19, identifies that we need to have the 'right people in the right place with the right skills'. The organisational development strategy will underpin the wider transformation strategy and is part of how we deliver the strategy. For that reason the OD strategy has been on hold waiting for completion of the overall approach and vision. The Strategic Action Plan includes an action to develop and Implement an Organisational Development Strategy by 31st January 2020.	Lynne Donovan	Oct 2017 Changed to April 2019 Changed to 31st Jan 2020	A Fixed term Principal HR officer (Workforce Development) has been appointed with effect from 7 January 2020. They will be meeting with all Heads of Service to consider current and future service delivery needs and the skills and experience employees will need.  The draft Workforce Development Strategy will be consulted upon in Summer 2020.	In progress	25%
654A2016 (issued March deferred due to election until June)	Savings planning (Financial Resilience Presented Cabinet 5th July 2017)	<b>P1.</b> Strengthen financial planning arrangements by: ensuring that savings plans are underpinned by robust business cases	1 Develop a new template to capture detailed information on future savings proposals. The template will include consideration of the Well being of Future Generations (Wales) Act 2015 to further develop links between the MTFP & Council Priorities an objectives. 2. Guidance notes to be produced to help managers understand why and how to complete.	We are currently refreshing the savings template and all significant service changes will require robust business cases to be proposed moving forward.	Stephen Harris	Oct - Dec 18	Savings templates were completed by officers for all savings proposals included in the Draft Budget Proposals for 2020/21. This will now be business as usual but the format and content of the templates will be kept under review to ensure that they remain fit for purpose.	Completed	100%
WAO Ref	Overview and Scrutiny - Fit for the Future?	<b>P1</b> Improving the provision of training and development opportunities for members to help a) improve their understanding of their role in overview and scrutiny; b) develop their skills to be able to scrutinise effectively; and c) improve their understanding and consideration of the Well-being of Future Generations Act when undertaking scrutiny activity by providing further training .	a) & b) - To run a self-evaluation Survey of officers and members (based on the good characteristics of scrutiny guidelines). Once the results have been analysed, the results and the WAO findings will be used to form a member workshop. The outcomes of member workshops will be used to triangulate these 3 different forms of intelligence to set an action plan for improvement. This outcome of this action is to have a developed action plan that will then be monitored by the Scrutiny Leadership Group.	A report was considered by Council on 16th April 2019, with 11 recommendations to improve the scrutiny function. Included in the recommendations were proposals to offer additional scrutiny training which will include scrutiny skills and knowledge in addition further WFG training in the form of a workshop in summer 2019, this will be included in an action plan for member training and development and will be monitored by Scrutiny Leadership Group.	Cath Forbes-Thompson	Jul-19	The Action stated that an Action Plan would be developed, this is completed and has been reported to Scrutiny Leadership Group on 2nd October 2019 with an update on the progress. Within the action plan to date we have held a WFG workshop on 11th September 2019 and offered to all scrutiny committee members, a further workshop has been planned for 23rd January 2020 for Partnerships scrutiny committee to focus on PSB scrutiny. Scrutiny Chairs training was arranged jointly with Gwent Local Authorities on 8th July 2019 and a further session has been organised on 27th January 2020. A Scrutiny questioning and listening skills training session has been planned for 12th March 2020. Peer Observations - All scrutiny committees have been provided with links to views webcasts of other local authority scrutiny committees linked to upcoming topics, in order to provide a different perspective. Visits to other local authorities will be organised during the first few months of 2020 for small groups of members wishing to observe other scrutiny committees. Members have been reminded that scrutiny good practice guides are available on the Members Portal.	Completed	100%

## Action Plan 2020 Response to Regulator Proposals

Number and reference of action	Name of Report	Regulator Proposal	Action	PREVIOUS UPDATE	Service Officer Responsible	When will be completed by	CURRENT UPDATE - JANUARY 2020	Status	Percentage completed
609A2018-19	Issued July 2018	<b>P3</b> Setting clear priorities and actions for improvement for the scrutiny function taking into account current and future challenges	The above action to complete the survey and hold workshops with input from the WAO report will form the action plan that will address this proposal and will be monitored by Scrutiny Leadership Group	The report considered by Council on 16th April 2019 with 11 recommendations as noted above decided to implement the following changes immediately: Change the names of Education for Life and Health Social Care and Wellbeing to Education Scrutiny and Social Services Scrutiny respectively, in order to remove link to former Community Strategy. Adjust scrutiny committee structure, to ensure that there is sufficient capacity to consider items and not overburden some committees, Council opted for 5 scrutiny committees. Agreed to review in 12 months, decided to continue with 6 weekly cycle of meetings and retain committee size, agree to ensure that scrutiny committee chairs are consulted on all reports where applicable. Further work will be done to improve public engagement, develop policy development work. These actions will be included in the action plan to be monitored by Scrutiny Leadership Group.	Cath Forbes-Thompson	Jul-19	The Action stated that an Action Plan would be developed, this is completed and has been reported to Scrutiny Leadership Group on 2nd October 2019 with an update on the progress. Within the action plan to date; all changes to the committee structure have been completed and ongoing monitoring of consultation of scrutiny chairs is being carried out. Scrutiny Leadership Group were provided with an update of public engagement through use of social media at the October 2019 meeting and gave views on the next steps. Two Task and Finish Groups have been approved in terms of Policy Development Work and members will be encouraged to consider further work in this area when developing forward work programmes for the year ahead. At the end of the 12 month trial for the new scrutiny arrangements a review will be carried out and reported to Council who will consider the results and determine what is the best format for scrutiny going forward.	Completed	100%
New WAO ref 826A2018-19	<b>Service User Perspective Review</b> Final Dec 18 Presented to Cabinet 30 Jan 19	<b>P1</b> To ensure that the WHQS programme meets the needs of all tenants and leaseholders the Council should; <ul style="list-style-type: none"> <li>strengthen its communication approaches with all tenants and leaseholders, taking account of the experiences of different groups of residents;</li> <li>monitor and report compliance with the Charter for Trust to address any identified issues; and</li> <li>analyse complaints about the WHQS programme systematically to address the root causes and share learning to improve tenants' and leaseholders' experience of the programme</li> </ul>	<b>Communication:</b> Current communication approaches will be reviewed with our tenant working group whilst also considering the responses received from the household survey.  <b>Charter for Trust:</b> included within all contract documentation and promoted at each pre-contract meeting, ensuring that information is required to be passed on to all members of the workforce including sub-contractors. Feedback from tenants to be analysed to learn from experiences.  <b>Complaints:</b> Tenant satisfaction returns will be reviewed to ensure any areas of concern are identified and addressed. As part of our complaints process each complaint will be considered to establish if any service changes are required to improve customer experiences for the future.	Customer satisfaction questionnaires are completed and responses reviewed to learn from tenant experiences and make improvements to service delivery. This includes telephone calls to obtain feedback on tenant experiences of the work, quality and compliance with the Charter for Trust Complaints: Although Response rates for 'Internal Works' to the previous postal surveys has been well monitored for a number of years with follow up actions addressed as and when required, the return rate for External Works was low.	Shaun Couzens	March 19 - March 2020	Communication is being provided using a range of media including newsletters, letters, local events, Corporate events, social media and various tenant groups. Letters advising tenants of planned works including the timing and extent of works to their properties have been reviewed and amended to provide more detailed information. Complaints: A new telephone survey process which went live at the end of January 2019 has seen an improvement in this area, where any issues experienced by the tenant can be discussed and followed up on by the relevant officer.	Completed	100%
WAO ref 994A2018-19	<b>WHQS Follow Up</b> Issued Jan 2019. Reported to Cabinet 30 Jan 19	<b>P1</b> The Council should ensure that members and tenants receive accurate WHQS performance information regularly about its progress towards achieving its 2020 programme deadline.	<b>Governance:</b> <b>The Repairs &amp; Improvement Group (R&amp;I)</b> is a representative of tenants who meet on a monthly basis. The Group challenge the progress of the WHQS programme and focus on a specific topic relating to WHQS such as Environmental Works, Sheltered Housing Programme and Post 2020 strategy. There is also a dedicated focus on Performance. Performance is also reported at each meeting using the WHQS scorecards that are produced monthly from the validation team. <b>Caerphilly Homes Task Group (CHTG)</b> is a representative of tenants and members specifically set up in 2012 to fulfil a commitment made by the Council following the ballot to fully involve tenants in the WHQS decision making process. The Group meets 6 weekly to receive and note information reports, to receive and consider varying reports and make recommendations to the Housing & Regeneration Scrutiny Committee, Policy & Resources Scrutiny Committee (P&R) and Cabinet.		Shaun Couzens	01/03/2020 (ongoing)	A standard set of performance reports have been developed and agreed with the R&I Group and these are presented and discussed at each monthly meeting with performance being a set agenda item. The same reports are then used to support all relevant committee reports so members, tenants and staff all have consistent information relating to the progress of the programme.	Completed	100%
		<b>P2</b> The Council should agree a Local Housing Strategy to set out its long-term vision for the future priorities for homes in Caerphilly.	1. Develop an up to date over arching Local Housing Strategy to set out the long term vision for housing within Caerphilly.	The Gwent Homelessness Strategy, which is a key strand of the Local Housing Strategy was approved by Cabinet on 12 December 2018. Consideration is being given to resources required and procurement opportunities available to develop an over arching Local Housing Strategy, and to review existing and develop new themed housing strategies	Shaun Couzens	Mar-20	A report setting out the Housing Development strategy for providing additional council homes has also been developed and will be considered by Cabinet on the 15th January, 2020. Having determined that there required resources to progress with the development of a local housing strategy are not available in-house, this is now being progressed by commissioning the services of a specialist external consultant via Procurement Services	In progress	25%
		<b>P3</b> The Council should ensure that Equality Impact Assessments are undertaken consistently.	1. Record and retain evidence that, where relevant, Equalities and Welsh Language issues are properly taken into account throughout policy development, consultation and approval processes. 2. Record decisions in committee reports in relation to EIAs in accordance with CCBC document 'Equalities Implications in Committee Reports 2018'	All Housing managers and officers responsible for housing policy development have been reminded of Equality Act obligations and received a copy of 'Equalities Implications in Committee Reports 2018'. Where completed, a copy of the relevant EIA has been attached, as background papers, to the committee report.	Shaun Couzens	March 19 - March 2020 (Equality Assessment is ongoing)	In addition to the previous update, relevant officers have now also received new EIA training to support the assessment process	Completed	100%

## Action Plan 2020 Response to Regulator Proposals

Number and reference of action	Name of Report	Regulator Proposal	Action	PREVIOUS UPDATE	Service Officer Responsible	When will be completed by	CURRENT UPDATE - JANUARY 2020	Status	Percentage completed
WAO Ref 1073A2019 March 2019	Well-being of Future Generations - An examination of improving take up of the Flying Start Programme	Areas for Improvement - <b>Long term:</b> Council has started to track data on outcomes for children and consideration is needed for tracking parental outcomes	1. Develop a system to link to the employability / legacy programmes to track parental outcomes in tackling poverty. 2. Deliver training on and explore the use of the family resilience tool by frontline staff to track outcomes	1. A joint meeting was held between Family Support, Legacy and Employability leads to plan implementation of how to track parental transition to employability programmes 2. Resilience training has been delivered across different target groups. Evaluations were very positive and next steps identified.	Sarah Mutch	1. March 2020 2. July 2020	Parents from FS signing up to employability programmes or legacy projects are reported back to parenting team monthly and recorded. However, the best method for capturing and reporting the data over time is being developed. There is very good transition now between programmes. The parents from Lansbury have set up their own constituted group called Bridging the Gap and are now running their own events. at Christmas they ran their own Christmas grotto and party in St James ICC for the community for 100 children. They are now starting a pilot to run reception in St James ICC taking over responsibility for booking rooms and organising parent / community engagement and designing the new look cafe and children's area. They are supported by Parent Network who are also supporting a work placement for parents who wish to have work experience prior to applying for jobs or to improve their skills.	In progress	75%
		Area for Improvement - <b>Prevention</b> * Consideration of the approach to engaging those parents who are not currently taking up or attending Flying Start. * Consideration of the approach to re-engaging parents who are unable to attend regularly	Explore the initial data form Parent Champions to identify parental issues during 2018/19 and consider how this data could be used to shape future delivery	We have collated the data but this is yet to be analysed.	Sarah Mutch	Mar-20	The needs have been analysed and are shaping future commissioning and delivery. Please see example above regarding increased feeling of community ownership of buildings.	In progress	50%
		Area for Improvement - <b>Integration</b> * Consideration of how increasing take up and attendance could impact positively and negatively on the demand for, and capacity of, other Council and non-Council services (both public bodies and voluntary sector) * Consideration as to whether all step leads are fully conversant with the definition of Integration as set out in the Act	1. Explore use of the resilience framework to identify barriers to attendance 2. Explore development of 'My Journey booklet' into an electronic all for families 3. Develop case studies to show added value of integration of early intervention preventative services with statutory provision 4. There are 4 actions relating to corporate learning for staff and members to embed the 5 ways of working	This is in the early stages of development and planning prior to implementation.	Sarah Mutch & Ros Roberts	Action 1-3 - March 2020 Action 4. May 19- March 2020	The resilience framework is being used within the current existing assessments and will be used in the new ways of working to empower families to support themselves in their communities. Early Years Transformation programme has developed a model for implementation of phase 1 pilots being planned in detail for implementation in the Spring term. This will consider how to develop the My Journey booklet into an Early Years regional booklet / electronic booklet / app once the evaluation work is completed. Case studies are being developed to show the impact of parenting and employment joint working.	In progress	50%
		Area for Improvement - <b>Collaboration:</b> Consideration of how collaborating in different ways may help to engage parents who are not taking up the Flying Start offer, for example, health visitors, Parent Champions.	1. Implement use of the 'My Journey booklet antenatal to ensure families understand the programme and to all delivery partners. 2. Continue development of wider collaboration work through Children First task group	1. The My Journey booklet has been finalised and is at print run stage. 2. Following our initial research we believe there is more added value to a regionalised approach to collaboration under early years integration and Children First.	Sarah Mutch	Mar-20	Early Years Transformation programme has developed a model for implementation of phase 1 pilots, being planned in detail for implementation in the Spring term. This is a more regionalised and collaborative approach across Blaenau Gwent, Caerphilly, Newport, ABUHB and Public Health Wales.	In progress	50%
		Area for Improvement - <b>Involvement</b> Development of innovative ways of reaching and engaging families who do not take up entitlement or do not consistently attend sessions Consider impact of the 'parent champions'; Consistent provision of feedback across all Council services to people who engage in consultations Further exploration of how digital technologies could increase take up & attendance	1. Explore text remind systems for feasibility 2. Closer working between childcare and parenting teams for families who are struggling with attendance 3. Evaluate the impact of Parent Champions in the community.	1. Initial research is showing the text system is more complex to comply with unsolicited marketing rules so this may take longer to achieve. 2. There has been increased connection between childcare settings and parenting teams both informally as well as formally through the joint cluster meetings. 3. Plans to start evaluation of Parent Champions in the autumn term.	Sarah Mutch	1. August 2019 2. August 2019 3. March 2020	Family Support Workers have greater connection with both childcare, health and SLC teams to promote support available for families. Evaluation of the Parent Champion role is ongoing. However, the biggest game changer may be through the Early Years transformation programme work which is looking to support all families universally in a geographical areas of both Flying Start and non-Flying Start under an Early Years team of people from both LA and ABUHB with a wider team of more specialist people around the core team from across all agencies including voluntary sector. we are aiming to do this through the adapted Privacy Notice to work with all families under the Early Years system to prevent the most vulnerable families not knowing what support is available to them for early intervention and prevention.	In progress	50%
WAO Ref 1326A2019-20 Received 19 June 2019	Corporate Safeguarding arrangements for Children Report	<b>R3</b> Strengthen safe recruitment of staff and volunteers by: 1) ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment 2) policies cover all services that come into contact with children; creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks 3) requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement.	1. Implement Safer Recruitment Policy across the Council 2. HR systems to be reviewed and improved 3. Internal Audit to monitor compliance in any audit work undertaken 4. Work with Procurement and Commissioning Officers across all Council services to develop a system to ensure compliance which can then be monitored	New - no previous update	Gareth Jenkins on behalf of Procurement, HR and Internal Audit	1. Oct 2019 2. Oct 2019 3. Ongoing 4. December 2019	1. Final draft policy is due to go to Cabinet in February/March 2020 2. Completed 3. Internal Audit Team have received Safeguarding Training prior to undertaking programme of audits 4. Task Group established to progress implementation	1. In progress 2. Completed 3. Completed 4. In progress	80% 100% 100% 50%
		<b>R4</b> Ensure all relevant staff, members and partners understand their safeguarding responsibilities 1) Safeguarding training is mandated and coverage extended to all relevant council areas, and standard on induction programmes; 2) create corporate-wide system to identify, track and monitor compliance on attending safeguarding training inc. elected members, schools, governors and volunteers 3) requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and young people to undertake safeguarding training.	1. Fully implement the Training Programme across the Council through DSO Group supported by Children's Services 2. ITrent to be adapted to record all training using agreed drop down options. Retrospective training to be recorded See item 4 for R3 - repeated	New - no previous update	Gareth Jenkins on behalf of Procurement, HR and Internal Audit	1. & 3. Dec 2019 2. October 2019	1. Training Framework implemented in November 2019 2. Work is ongoing to amend recording systems	1. Completed 2. In progress	100% 50%

## Action Plan 2020 Response to Regulator Proposals

Number and reference of action	Name of Report	Regulator Proposal	Action	PREVIOUS UPDATE	Service Officer Responsible	When will be completed by	CURRENT UPDATE - JANUARY 2020	Status	Percentage completed
		<b>R6</b> Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and council-wide set of performance information, covering conclusions of reviews or inspections, service performance data, key personnel data such as DBS checks and performance of contractors.	Annual Corporate Safeguarding Report will be presented to Social Care & Well Being Scrutiny Committee and to Audit Committee rather than being posted for information as it currently is. The Report will be available to all other Scrutiny Committees and can be called in as appropriate.	New - no previous update	Gareth Jenkins on behalf of Procurement, HR and Internal Audit	July - Dec 19	Completed - forward work programmes have been amended WAO Report presented to Social Services & Well Being Scrutiny Committee in October and is scheduled to go to Audit Committee on 28th January 2020	<b>Completed</b>	100%
		<b>R7</b> Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices	Work with Internal Audit to review forward work programme and incorporate Corporate Safeguarding arrangements into audits going forward	New - no previous update	Gareth Jenkins on behalf of Procurement, HR and Internal Audit	Sept 19 - ongoing	Completed - Corporate Safeguarding incorporated into Audit Work Programme for 2020 wherever relevant and appropriate	<b>Completed</b>	100%
		<b>R8</b> Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council	On the basis of the Review findings, the risks will be included on the Social Services Risk Register and the Corporate Director for Social Services will progress inclusion on the Corporate Risk Register through CMT.	New - no previous update	Dave Street and Gareth Jenkins	Sep-19	Corporate Safeguarding has been included in the Social Services Risk Register CMT and Cabinet confirmed that the risk does not need to be escalated onto the Corporate Risk Register	<b>Completed</b>	100%
Nov-19	Well-being of Future Generations 'Steps examination' = 'Preventing unnecessary admissions to hospital and facilitating timely discharges'	<i>Report received and service action plan finalised. Proposals and actions will be added to the list after the report is presented to Social Services committee.</i>							
WAO Ref 1603A Received Nov 19	Delivering with less - the Impact on Environmental Health Services and Citizens	<i>Draft Report received, proposals will be added to the list with actions when finalised and the report presented to committee.</i>							



## AUDIT COMMITTEE 28<sup>TH</sup> JANUARY 2020

**SUBJECT: CORPORATE RISK REGISTER (Q2 2019/20)**

**REPORT BY: CORPORATE DIRECTOR OF EDUCATION & CORPORATE SERVICES**

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### 1. PURPOSE OF REPORT

- 1.1 To provide an update of the Corporate Risk Register in accordance with the Council's Risk Management Strategy.
- 1.2 The updated Corporate Risk Register (CRR) (Appendix 1) is presented to Audit Committee so there is opportunity for the Committee to satisfy itself that appropriate arrangements are in place for the Council's risk management processes to be regularly and robustly monitored and scrutinised.
- 1.3 To update Audit Committee on the changes that has been made to the overall Performance Framework particularly in relation risk.

### 2. SUMMARY

- 2.1 Under the Council's Risk Management Strategy, the Corporate Management Team (CMT) own, manage, monitor and review the Council's Corporate Risks on a quarterly basis, with six monthly progress reports submitted to Cabinet. Updates are also provided to Audit Committee, which has the role of reviewing and challenging the Risk Register and where relevant, resultant action plans for the Council's key strategic and corporate risks.
- 2.2 In order to present the most recent information, this report focuses on the CMT update of 9<sup>th</sup> December 2019.

### 3. RECOMMENDATIONS

It is recommended that the Audit Committee considers the content of the Corporate Risk Register and associated mitigating actions.

### 4. REASONS FOR THE RECOMMENDATIONS

For the Audit Committee to satisfy itself that robust processes and procedures exist and are applied for the management of top level risks. Members have a critical role to play in evaluating the Council's risk management arrangements and in particular understanding how the council identifies, manages and, where possible, mitigates/removes risk.

## **5. THE REPORT**

- 5.1 Risks within the Authority are identified and managed at different levels. Service priorities identify risks to delivering business whilst Directorate risks identify more significant risks that may have cause and effect across a Directorate. The CMT Risk Register is the highest level of risks to the whole authority, often referred to as the Corporate Risk Register.
- 5.2 The Council's Performance Management Framework has been reviewed and redesigned over the course of the last 12 months and a report is going to Cabinet in February 2020 to view and approve the new framework and this will include how risk is reviewed and reported. The Council's Risk Management Strategy 2017 will need to be updated in order to align with the new overall framework as noted above.
- 5.3 The Directorate Risks will be updated on a quarterly basis and the risks identified as part of this will be escalated where appropriate to the Corporate Risk Register. A significant advantage of this new approach is that CMT will have a view of risks laterally across Directorates as well as 'top down'.
- 5.4 The Corporate Risk Register is a 'living document' and will change when reviewed and assessed on a quarterly basis. New risks will emerge and some existing risks will be closed. Furthermore, risk ratings will change (red/amber/green) and mitigating actions and progress comments will be updated.
- 5.5 No new risks have been added to the register since it was presented to Audit Committee on 15<sup>th</sup> October 2019. The Brexit Risk (CRR 01) has become a low risk and the Climate Change (CRR 04) risk has increased from Medium to High following discussions at the last Audit Committee meeting. All other risk levels have remained the same.
- 5.6 Risk Management is an ongoing area for development in a wider sense and will be part of the review the Risk Strategy 2017. In future reports we show the tracking of changing risk rating any risks that have been deleted and any new ones coming onto the register.

### **Conclusion**

- 5.7 In line with the approved Risk Management Strategy the Corporate Risk Register is periodically reviewed and updated and is presented to the Audit Committee to provide an opportunity for the Committee to satisfy itself that appropriate arrangements are in place for the Council's risk management processes to be regularly and robustly monitored and scrutinised.

## **6. ASSUMPTIONS**

- 6.1 We make the assumption that resources remain the same in addressing the risks for the future.

## **7. LINKS TO RELEVANT COUNCIL POLICIES**

- 7.1 Corporate Plan 2018-2023 (reviewed and updated 2019).

## 8. WELL-BEING OF FUTURE GENERATIONS

- 8.1 Management of risk is an important element in delivering council priorities and ensuring contribution to the Well-being Goals as set out in the Well-being of Future Generations (Wales) Act 2015 [WBFGA]:
- 8.2 The Well-being of Future Generations (Wales) Act 2015 [WBFGA] identifies a core set of activities that are common to the corporate governance of public bodies where change needs to happen:
- Corporate Planning
  - Financial Planning
  - Workforce Planning
  - Procurement
  - Assets
  - **Risk Management**
  - Performance Management
- 8.3 The Corporate Risk Register incorporates the five ways of working (ICLIP) identified within the sustainable development principle in the WBFGA. These are:
- **Involving** a diversity of the population in the decisions that affect them.
  - Working with others in a **Collaborative** way to find shared sustainable solutions.
  - Looking to the **Long-term** so that we do not compromise the ability of future generations to meet their own needs.
  - Taking an **Integrated** approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.
  - Understanding the root causes of issues to **prevent** them from occurring.
- 8.4 Risks are assessed in terms of their implications for the well being of future generations.

## 9. EQUALITIES IMPLICATIONS

- 9.1 The Local Government Measure defines fairness and access as one of the criteria that constitutes 'improvement' within the Wales programme for Improvement 2009.
- 9.2 Promoting equalities is a fundamental requirement of the Future Generations legislation, with specific resonance for meeting the Well-being Goals of: *A More Equal Wales*, and *A Wales of Cohesive Communities*
- 9.3 An Equalities Impact Assessment (EIA) is not needed as this report relates to identified risks and any actions to address risks that require a report will have an EIA if required.

## 10. FINANCIAL IMPLICATIONS

- 10.1 There are no direct financial implications to this report, although Appendix 1 identifies risks regarding the Medium-Term Financial Plan (MTFP).

## 11. PERSONNEL IMPLICATIONS

- 11.1 There are no personnel implications arising from this report.

## 12. CONSULTATIONS

- 12.1 This report has been sent to the consultees listed below and all comments received are reflected in this report.

## 13. STATUTORY POWER

- 13.1 Local Government (Wales) Measure 2009. Well-being of Future Generations (Wales) Act 2015.

Author: Ros Roberts, Business Improvement Manager, [roberr@caerphilly.gov.uk](mailto:roberr@caerphilly.gov.uk)

Consultees: Christina Harray, Interim Chief Executive  
Richard (Ed) Edmunds, Corporate Director Education and Corporate Services  
Councillor Eluned Stenner, Cabinet Member for Finance, Performance & Planning  
Stephen Harris, Interim Head of Business Improvement Services  
Mark S Williams, Corporate Director Communities  
Dave Street, Corporate Director Social Services & Housing  
Shaun Couzens, Chief Housing Officer  
Kathryn Peters, Corporate Policy Manager  
Richard Harris, Internal Audit Manager

Background Papers:

Appendices:

**Appendix 1 – Corporate Risk Register Quarter 2 2019/20**



Ref Appendix 1	Topic (& Service)	Risk, opportunities and Impact	Mitigation Actions (What actions can we take to address the risks or realise the opportunity)	Progress Update Dec 2019 (Are the mitigating actions reducing the risk or realising the opportunity?)	Risk Level 2019-20 Q1	Risk Level 2019-20 Q2	Does the risk affect the Well-being of our Communities?	Well-being Risk Level
<b>CRR 01 - All Directorates</b>	Exit from the EU (Brexit).	The decision to leave the EU and the looming deadline to secure an exit deal has created considerable uncertainty.  Moving forward it is difficult to determine what impact the exit from the EU will have in the medium to longer-term for Caerphilly CBC and our communities. However, in the short-term possible negative impacts from a No Deal scenario include the potential for workforce supply shortages in some areas and the possibility of some disruption to the supply of goods and services. There is also potential for price increases in the event of a No Deal exit.	An internal Brexit Working Group has been established consisting of key staff across all Directorates. There is also cross-party political representation on this Group. The Council has also set aside £1m to meet any short-term financial impacts arising from Brexit.	The Withdrawal Agreement has been approved by Parliament and is now working its way through the House of Lords. The UK will leave the EU on the 31 <sup>st</sup> January 2020 and there will then be an eleven month transition period to discuss the finer details of the deal and the future working relationship with the EU. Until this process is completed the internal Brexit Working Group will continue to meet to keep the position under review.	Medium	Low	Potential impacts are not fully understood but they are likely to be felt over the short, medium and longer-term.	Unable to assess currently due to the level of uncertainty.
<b>CRR 02 - All Directorates</b>	Medium-Term Financial Plan (MFTP)	Failure to identify sufficient savings to support the Medium-Term Financial Plan (MFTP).	The Authority has a strong record of delivering balanced budgets and the process to finalise the 2020/21 budget is now nearing completion.	Draft budget proposals for the 2020/21 financial year were presented to Cabinet on the 13th November 2019 and this was followed by an eight-week consultation process. The announcement of the 2020/21 Provisional Local Government Financial Settlement was delayed until 16th December 2019 and this showed a favourable position. This along with feedback from the consultation process is now being considered to shape final budget proposals for Cabinet and Council consideration in February 2020. The funding position for future years remains uncertain as the UK Government is yet to undertake a three year comprehensive spending review. An important element of addressing future financial challenges will be our Future Caerphilly Transformation Strategy (TeamCaerphilly – Better Together). This Strategy sets out details of a major transformation programme to examine how services are prioritised, how they can become more business efficient, to explore opportunities for greater customer focus and digital delivery, and to consider alternative delivery models and seek out commercial opportunities.	Medium	Medium	Yes, we need to explain how it affects the Well being of Future Generations in our Communities	Medium
<b>CRR 03 - All Directorates</b>	GDPR Information Governance	<ul style="list-style-type: none"> <li>Failure to locate reliable information quickly (for example if backlogs of records accumulate) impacts on service delivery, plus we are missing an opportunity to use the Council's information assets more widely to benefit other Council services.</li> <li>GDPR introduces fines of up to 20million Euros for failing to evidence compliance, including Privacy Impact Assessments at early stage, and for data breaches such as data loss or retaining information for too long.</li> <li>Failure to comply with information requests (e.g. FOI) could lead to action by the Information Commissioner's Office - compliance expectation increased to 90%</li> <li>These risks could result in adverse press, loss of trust by the public, and criticism from the Council's auditors.</li> </ul>	IGPT activity reported to Corp Gov Panel, including: <ul style="list-style-type: none"> <li>Report on options for GDPR DPO role</li> <li>Review Information Asset Registers to include info required by GDPR, e.g. legal basis for processing</li> <li>Continue SIRO review of Information Risk Returns</li> <li>Update and re-launch DPA training, inc Members</li> <li>Update info sharing register to identify contract improvements</li> <li>Enforce use of privacy notices and Privacy Impact Assessments</li> <li>Implement records management programme, including better identification/creation of records and backlogs addressed (e.g. email, networks) and ensure records with historic value are protected</li> <li>Review publication scheme and charges for info requests</li> <li>Continue suspension of surveillance activity</li> </ul>	Records management work programme has resulted in over 1km hard copy records identified for secure disposal, saving space in Records Centres and Council offices. Network drives under review with data emerging on ownership, duplicates, and data with sensitive content, which means we can approach data owners directly to make decisions on their data regarding anonymisation or deletion, to reduce backlogs and facilitate implementation of Office 365. Email backlogs under review with the next step to address leaver data. New modular Protecting Information elearning launched to staff and elected members, aimed at 'drip-feeding' key messages throughout the year. Discussions with all Directors/SMTs about improving FOI compliance in the face of increasing numbers of requests. Devised a common methodology for assessing likelihood and severity of risks across data breaches, IT security incidents, Data Protection Impact Assessments, to bring more consistency. Data processing agreements and DPIAs embedded within procurement processes, and awareness raised of DPIAs, records management and IT Security at Go Digital days and cyber bus tour.	Medium	Medium	Yes - protection of privacy (Article 8 HRA), Duty to Document and protection of historic records to evidence public sector activities	Medium
<b>CRR 04 - All Directorates</b>	Climate Change	Not being prepared for the impacts associated with climate change. For Caerphilly this will manifest as a more volatile weather pattern: <ol style="list-style-type: none"> <li>More severe storms resulting in damage to trees and buildings.</li> <li>Increase in winter rainfall resulting in flooding, affecting people, property and infrastructure, including availability of outdoor sport pitches.</li> <li>Extreme Weather Conditions: Difficulty in modifying temperatures in some of our buildings (incl. Housing) could lead to increased financial burden, uncomfortable environment conditions (dangerous temperatures) affecting people's health, wellbeing and delivery/receipt of effective services.</li> <li>Changes in species including a decline in native species, changes in migration patterns and increases in alien and invasive species, including pests and disease.</li> <li>Reduction in summer rainfall resulting in reduced river flows and water availability.</li> <li>Increase in levels of extreme weather such as snow/ice which could potentially impact on not only the travelling public but the elderly/frail and those in fuel poverty.</li> <li>Grass fires.</li> <li>Vehicles being used by the authority are outdated and therefore consuming more fuel and producing higher levels of emissions.</li> <li>Extremities in foliage growth, and the reduction in both street/highways cleansing, and weed control, will have a direct impact on future maintenance and environmental damage controls, potentially leading to systematic failures and increased costs to the authority for response repairs (e.g. Footpaths; Highways; Gullies; Drainage; Cycle-ways) as well as public liabilities.</li> </ol>	A Local Climate Impact Profile (LCLIP) has been prepared and links to other plans including Highways Winter Maintenance Plans, Business Continuity Plans & Emergency Plans etc.  Mitigation work being undertaken includes: <ol style="list-style-type: none"> <li>A Tree Management Strategy and implementation of resources to manage tree stock.</li> <li>Assessing the condition of trees.</li> <li>Assessing the vulnerability of drainage infrastructure in excessive rainfall.</li> <li>Installing flood risk measures at priority vulnerable locations.</li> <li>Considering climate change in the Asset Management Programme.</li> <li>Street lighting options being considered to reduce Carbon emissions.</li> </ol>	<ol style="list-style-type: none"> <li>An additional Arboricultural Officer has been appointed to assist with programme of tree surveys undertaken to deliver the adopted Tree Management Strategy. Tree works being undertaken in accordance with survey recommendations.</li> <li>Local Flood Risk Management Strategy (Engineering) in place. Risca flood defences now completed. Sustainable Drainage Approval Body (SAB) implemented from 7th Jan 2019 to improve control and approval for drainage infrastructure on new developments. New Land Drainage Bye Laws now approved. Pitch drainage capital is being selectively spent at priority sites.</li> <li>Ongoing staff training is being delivered by the Corporate Energy Team Re: Energy Efficiencies/Carbon Management and Effects of Climate Change. Several projects have been delivered for solar PV installations to Corporate Building (e.g. Care Homes) and schools.</li> <li>Biodiversity Work: Supporting 'pollinators' projects including work with Sirhowy Valley Honey Bee Company.</li> <li>The Winter Service Plan 2018 (Highways) has been reviewed, updated, placed on the CCBC internet and effectively delivered to date.</li> <li>Our wider organisational response to extreme weather events were the subject of a de-</li> <li>A fleet contract (Managed Service Partnership) has been established to implement a replacement programme which is raising vehicle standards, improve fuel consumption and emissions, and reduce servicing, maintenance and breakdown demands (improve efficiencies). Trialling electric vehicles.</li> <li>Street lighting: Proposals approved for lamp replacement programme (LED) and part-night-lighting (a strategy being implemented over a two year phased approach).</li> </ol>	Medium	High	Yes - there is an impact to a 'Resilient Wales' by not proactively addressing the operational response to climate change. The contribution to global issues and a 'Globally Responsible Wales' is met through low carbon planning and sustainable development. There is a direct impact to Health also.	Medium

Ref Appendix 1	Topic (& Service)	Risk, opportunities and Impact	Mitigation Actions (What actions can we take to address the risks or realise the opportunity)	Progress Update Dec 2019 (Are the mitigating actions reducing the risk or realising the opportunity?)	Risk Level 2019-20 Q1	Risk Level 2019-20 Q2	Does the risk affect the Well-being of our Communities?	Well-being Risk Level
<b>CRR 05 - Communities Directorate</b>	Community & Leisure:  Greenspace and Landscape Services	Ash die back ( <i>Chalara fraxinea</i> ) is the most significant disease to affect the UK tree population since dutch elm disease in the 1960's. The disease will result in the decline and death of the majority of ash trees in Britain. Unfortunately, many ash trees predominantly line our roadside verges, so the disease will affect high risk locations. In our borough, ~ 37,400 + ash trees could be affected by this, requiring substantial resource, logistics and environmental considerations/implications, such as: a) Thorough surveys (to identify needs/requirements) b) The formulation of a Removal Strategy c) Budgeting and Finance d) Considerable clean-up and disposals e) Wider environmental impact (contaminations/biodiversity/eco systems) d) Wider impacts on road sweeping and weed treatment. All of which, will ultimately lead to damage to the environment and its infrastructure and have an effect on the 'look and feel' of the county borough.	Initial action to include: 1. Interim CEO to discuss at G10 meeting of Gwent Chief Executives with a view to them lobbying WG for funding 2. Interim Director of Communities to raise with the WLGA so that they can lobby WG for funding. Followed by: 3. Write, approve and implement a Removal Strategy and 4. Secure appropriate Funding Streams to implement the Removal Strategy. 5. Source and secure wider partnership and collaborative arrangements to implement all necessary works. 6. Clarify known 'hot-spots' for initialising works, to control and manage any associated public risks/disruptions.	It is already known that this will require a substantial cost implication due to the logistics and labour intense nature of addressing such matters.  Considered the content and guidance as available from The <b>Tree Council publication: ASH DIEBACK: an Action Plan Toolkit First published February 2019</b>  Recently published research by the University of Oxford, Fera Science, the Sylva Foundation and the Woodland Trust calculated that this disease will have a significant cost impact across the country, due to the significantly high levels of mortality rates to the tree species affected (75%+).	High	High	Level unknown at present	Unknown
<b>CRR 06 - Communities Directorate</b>	Regeneration & Planning:  Local Development Plan	The Adopted LDP is due to expire on 31/12/21. The Replacement LDP was well advanced, however, the Council withdrew that plan in July 2016 following local opposition to a number of development sites contained within the Plan. The Council has resolved to progress the preparation of a Strategic Development Plan and a new LDP in parallel. The adopted LDP allocates land for the development of 8625 houses to be built over a 15 year period. The annual Joint Housing Land Availability Study indicates that many of the allocated sites are not available or viable within the required 5 year period, and there is therefore a shortfall of housing land. Housing developers will therefore submit applications to develop land that is not allocated in the LDP. The Council will consider the applications, but the lack of a five-year housing land supply will be a material planning consideration which could outweigh other policies in the plan. A refusal of planning permission may lead to an increase in appeals and award of costs if the Council is considered to have behaved unreasonably, e.g. where a reason for refusal is not based on any sound evidence.	The Adopted LDP remains in force until 2021. In the interim, officers are working closely with Welsh Government officials to agree the appropriate footprint for strategic planning for the Cardiff Capital Region. On 29th January 2018 the Cardiff Capital Region Cabinet agreed that work should commence on a Strategic Development Plan (SDP) for the area. A formal report was considered by the Cabinet on the 10th June 2019 which determined the timeline for reporting this matter to all ten Councils. Caerphilly Council considered this matter in October 2019 and resolved to commence work on the SDP.	Chief Planning Officers and Planning Policy lead officers have met monthly as a Project Group to progress various work streams necessary to establish the project in advance of the formal commencement of plan preparation. It is unlikely that the 5 year land supply can be addressed in the short term. In the medium to long term a replacement plan will increase the land supply position. A number of significant applications have been submitted and approved by Welsh Government on appeal. Resulting in significant cost to the authority. Having regard to the number of potential future developments there are concerns that existing infrastructure such as transport, schools, and other services is inadequate. Due to the number of impending developments being agreed by the WG Planning Inspector we have moved this into a high risk category.  Funding identified and approved for SDP.	High	High	Yes, the lack of an LDP threatens the timely delivery of land for development, particularly housing, making it more difficult to achieve the goal of prosperity.	Medium
<b>CRR 07 - Education &amp; Lifelong Learning Directorate</b>	School Attainment	1. Attainment levels are still below the Welsh average, below local Authorities with a similar Free School Meal population. 2. There is a gap between the attainment of Free School Meals pupils and Non-Free School Meals pupils which must be addressed. 3. Higher than expected rates of exclusion will impact on pupil attainment.	1. Standards of attainment are monitored and reported to the Senior Management Team (SMT) / Corporate Management Team (CMT) / Scrutiny Committee, through an annual programme of reporting described in the Directorate Plan Handbook. 2. Through the newly revised Sharing Ambitions document, the LA will continue to work closely with the EAS to ensure that schools are challenged and supported effectively. 3. Schools most at risk of underperformance will be monitored through the regional Schools Causing Concern process. 4. Where schools fail to make the expected progress at the expected rate, in consultation with the EAS, the LA will consider the use of statutory powers.	The unverified data for KS4 indicates an improving trend across the range of Legacy Indicators and newly implemented interim measures. There is a downward trend in the majority of indicators for exclusions.	High	High	Yes, this limits contribution to 'Prosperous and More Equal Wales'. Standards of attainment and gaps in inequality can result in a low skilled, low paid workforce, and higher levels of unemployment leading to poverty. Over the long-term (25 years) in the life of a young child to adult the potential outcome of the attainment gap makes this a high risk. This is a long term risk	High
<b>CRR 08 - Social Services &amp; Housing Directorate</b>	Fragility of the Social Care market. The independent sector social care market across Wales is in an unprecedented position in terms of its fragility and this is starting to be felt in Caerphilly.	<ul style="list-style-type: none"> <li>Providers unable to sustain existing packages of care.</li> <li>National Minimum Wage and National Living Wage creating additional financial strain which providers are expecting LA's to resolve.</li> <li>Little additional capacity to take on new packages of care.</li> <li>Ongoing Judicial Review across Wales re responsibility for Funded Nursing Care Payments.</li> <li>Potential financial impact on the Directorate and Authority.</li> <li>Introduction of RISSA from 01.04.18 could have significant implications for recruitment and retention of staff.</li> </ul>	Fee levels for 2017/18 agreed at 3.1%. This was funded via a mix of core funding and CCBC's element of the Social Care Workforce grant paid by Welsh Government. A further element of workforce funding has recently been released by WG. Discussions are ongoing with commissioned providers to determine how these monies should be allocated. Fee levels for 18/19 agreed at 2%	No change in risk level. 2018/19 fees agreed. Further concerns with regard to stability. Largest provider of domiciliary care in the UK in financial difficulty, this resulted in us cancelling our contract with them and moving to a new provider to ensure service maintained and resources are not only in large providers Further representations from Providers in relation to fee levels. Debates at a national level re sustainability of funding levels. One Nursing home has closed within the borough and 2 further homes have now been identified as services of concern.	High	High	Yes - reducing help that can be provided for the most vulnerable in our society will affect our ability to contribute to a 'Healthier Wales' which requires peoples mental and physical well-being to be maximised. Whilst this may be a medium risk operationally from a FGA perspective this would be high as it directly affects those most in need.	High (Medium-term)

Ref Appendix 1	Topic (& Service)	Risk, opportunities and Impact	Mitigation Actions (What actions can we take to address the risks or realise the opportunity)	Progress Update Dec 2019 (Are the mitigating actions reducing the risk or realising the opportunity?)	Risk Level 2019-20 Q1	Risk Level 2019-20 Q2	Does the risk affect the Well-being of our Communities?	Well-being Risk Level
CRR 09 - Social Services & Housing Directorate	WAO Corporate Safeguarding Review	WAO Review identified a number of areas for improvement that need to be addressed across the whole Council.	Corporate Safeguarding Board will meet quarterly to monitor an Action Plan to address the recommendations that has been developed by the Designated Safeguarding Officers in each Service area. Review and Action Plan to be presented to Cabinet and Scrutiny Committees.	Action Plan developed and dates for Cabinet and Scrutiny have been set.	Medium	Medium	Yes	Medium
CRR 10 - Social Services & Housing Directorate	Welsh Housing Quality Standard (WHQS) programme	Failure to meet WHQS for all our social housing stock by 2020. Everyone in Wales should have the opportunity to live in a good quality home within a safe and secure community. To help achieve this, the physical standard and condition of existing housing must be maintained and improved to the Welsh Housing Quality Standard (WHQS).	<p>The WHQS programme has its own specific risk register which is reviewed and updated by the Project Board quarterly.</p> <p>The highest risks are:</p> <ul style="list-style-type: none"> <li>Failure to achieve programme objectives - the probability level has increased due to one of the main internal works contractors having ceased trading and another (Vinci) terminating their contract early. Arrangements were made to initiate internal work via the DPS to achieve WHQS by 2020. There is still a risk in relation to the external works, however significant improvements in performance have been made. Contingency arrangements have been implemented as identified below.</li> <li>Contract arrangements for the south of the borough have been put in place for the external works and this is operating well. Originally the Dynamic Purchasing System (DPS) arrangement was introduced to provide an opportunity to undertake both internal and external works around the authority as a further contingency measure. As a result of two of the main internal works contractors ending their contracts, alternative arrangements have been implemented whereby the in-house workforce will pick up the majority of this workload by moving resources from other contract areas. This includes a recent transfer of contracts from the DPS of approximately 150 properties to ensure continuity of our in house workforce and to take advantage of the better performance and tenants satisfaction levels that are being experienced via our in house workforce. This has been reflected in a which was made available to members and tenants in April 2019. Monthly Project Board meetings will continue to be held to monitor ongoing performance and to assist with the decision making process. The completion date for full compliance is currently projecting June 2020 which is still within our target date.</li> </ul>	<p>The programme is now constantly being reviewed and more work undertaken in-house to provide us with a level of certainty and control as we move towards the final stages of the programme. There are some concerns in relation to contracts which include leasehold properties as these are incurring significant delays due to the need to follow legal consultation processes and subsequent challenges from leaseholders. This situation is currently being closely monitored and has been raised with WG who advise that other authorities have encountered similar problems. A significant percentage of work to the sheltered housing schemes is being undertaken by the in-house workforce. The programme is progressing with works on track to be completed by the 2020 deadline, however due to work content and asbestos issues, three schemes will require full decants which may delay completion until post 2020, but discussions with WG indicate that these can be categorised as acceptable fails. Performance levels for Qtr 2 are:- Internal compliance 91%, external compliance 83%, overall compliance 71%. Latest projections have confirmed the initial target date set internally of March 2020 should be slightly extended to June 2020 to allow for the issues experienced by contractors to be addressed.</p> <p>Furthermore information is constantly being gathered as part of a rigorous validation process which has put us in a much better position to project our completion date. The validation team will continue to challenge and closely monitor performance on a weekly basis for both internal and external aspects of the programme until its completion. The WG deadline therefore remains achievable.</p> <p>Projected expenditure against the budget has been reduced from £56m to £45m for this year, as some work will now be undertaken between April and June 2020. This information has been projected forward and used to review our delivery programme up to 2020, which demonstrates that this is still deliverable within the timescales and remains affordable at £260m, although borrowing of £15m will be required for the 2019/20 programme. £7.3m is available from WG as a contribution to the programme in the form of a MRA (Major Repairs Allowance) grant, which will be fully claimed by the end of Qtr 2. While there are risks that require appropriate mitigation measures there is an increased momentum and more confidence about the 2020 deadline which has been supported by the recent WAO review. Current borrowing projections indicate that £57m is required to finalise the programme which is below the level of borrowing approved by Full Council.</p>	Medium	Medium	Yes	Medium

**ICLIP Key:**  
**Involving** a diversity of the population in the decisions that affect them;  
**Working with others** in a **collaborative** way to find shared sustainable solutions;  
**Looking to the long term** so that we do not compromise the ability of future generations to meet their own needs;  
**Taking an integrated** approach so that public bodies look at all the well-being goals in deciding on their well-being objectives;  
**Understanding the root causes** of issues to **prevent** them from occurring.









## AUDIT COMMITTEE – 28TH JANUARY 2020

**SUBJECT: REGULATION OF INVESTIGATORY POWERS ACT 2000**

**REPORT BY: HEAD OF LEGAL SERVICES AND MONITORING OFFICER**

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### **1. PURPOSE OF REPORT**

- 1.1 To advise Members of the numbers of covert surveillance operations undertaken by the Council in accordance with the provisions of the Regulation of Investigatory Powers Act 2000 (RIPA) for the period 1<sup>st</sup> October to 31<sup>st</sup> December 2019.

### **2. SUMMARY**

- 2.1 To provide an update on the number of operations undertaken in accordance with RIPA for the period 1<sup>st</sup> October to 31<sup>st</sup> December 2019.

### **3. RECOMMENDATIONS**

- 3.1 None. Members note the information provided.

### **4. REASONS FOR THE RECOMMENDATIONS**

- 4.1 To ensure compliance with statutory requirements.

### **5. THE REPORT**

- 5.1 The Regulation of Investigatory Powers Act 2000 (RIPA) sets out strict controls for public authorities wishing to carry out covert surveillance of individual members of the public as part of their exercise of their statutory functions. In addition to this Act, advice and guidance is found within the Codes of Practice issued by the Investigatory Powers Commissioner's Office.
- 5.2 The Authority has a corporate policy, which provides guidance on how surveillance should be used by the relevant officers.
- 5.3 Public Authorities undertaking covert surveillance of individual members of the public are subject to inspection by the Investigatory Powers Commissioner's Office.
- 5.4 Members are advised that for the period 1<sup>st</sup> October 2019 to 31<sup>st</sup> December 2019 there has been one RIPA operation undertaken as follows:

Directed Surveillance (the covert surveillance of individuals) relating to the sale of alcohol to persons under the age of 18 years.

## **5.5 Conclusion**

5.6 The report advises members that there has been one application made in relation to RIPA operations for the period 1<sup>st</sup> October to 31<sup>st</sup> December 2019.

## **6. ASSUMPTIONS**

6.1 There are no assumptions contained within this report.

## **7. LINKS TO RELEVANT COUNCIL POLICIES**

7.1 This report contributes to the governance arrangements on the use of directed surveillance and covert human intelligence sources under the Regulation of Investigatory Powers Act 2000 as set out in the Council's Policy and Procedure under the Regulation of Investigatory Powers Act 2000.

## **8. WELL-BEING OF FUTURE GENERATIONS**

8.1 The Council is under an obligation to comply with legislative requirements - this report helps to achieve that.

8.2 The Regulation of Investigatory Powers Act 2000 (RIPA) provides a statutory mechanism for authorising directed surveillance and the use of a covert human intelligence source, which aims to ensure that any interference with the individual's right to privacy under Article 8 of the European Convention is necessary and proportionate, and that both the public interest and the human rights of individuals are protected and as such contributes to the following wellbeing goals within the Well-being of Future Generations Act (Wales) 2015.

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A globally responsible Wales

## **9. EQUALITIES IMPLICATIONS**

9.1 None, the report is for information only.

## **10. FINANCIAL IMPLICATIONS**

10.1 None, the report is for information only.

## **11. PERSONNEL IMPLICATIONS**

11.1 None, the report is for information only.

## **12. CONSULTATIONS**

12.1 None. The report is for information only.



### **13. STATUTORY POWER**

13.1 Regulation of Investigatory Powers Act 2000.

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Councillor Barbara Jones  
Interim Leader  
Caerphilly County Borough Council  
Ty Penallta  
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CF82 7PG

Reference	CCBC/BM/GEH
Date	15 October 2019
Pages	1 of 3

CC: Christina Harrhy

Dear Councillor,

### **Annual Audit Letter – Caerphilly County Borough Council 2018-19**

This letter summarises the key messages arising from our statutory responsibilities under the Public Audit (Wales) Act 2004 and our reporting responsibilities under the Code of Audit Practice.

#### **The Council complied with its responsibilities relating to financial reporting and use of resources**

It is the Council's responsibility to:

- put systems of internal control in place to ensure the regularity and lawfulness of transactions and to ensure that its assets are secure;
- maintain proper accounting records;
- prepare a Statement of Accounts in accordance with relevant requirements; and
- establish and keep under review appropriate arrangements to secure economy, efficiency and effectiveness in its use of resources.

The Public Audit (Wales) Act 2004 requires me to:

- provide an audit opinion on the accounting statements;
- review the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources; and
- issue a certificate confirming that we have completed the audit of the accounts.

Local authorities in Wales prepare their accounting statements in accordance with the requirements of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom. This Code is based on International Financial Reporting Standards. On 11 September 2019 we issued an unqualified audit opinion on the accounting statements confirming that they present a true and fair view of the Council's financial position and transactions. Our report is contained within the Statement of Accounts. The key matters arising from the accounts audit were reported to members of the Audit Committee in our Audit of Financial Statements report on the 23 July 2019 and an update subsequently to full Council on 30 July 2019.

- The Council continues to demonstrate effective arrangements in the preparation of its financial statements, enabling us to conclude our audit on 11 September 2019, ahead of the statutory deadline of 15 September. The Council has continued to provide good quality draft financial statements and accompanying working papers for audit. These were available for us to commence our audit fieldwork on 7 June 2019.
- There are two misstatements identified in the financial statements, which remain uncorrected:
  - The revaluation 5-year summary in note 23 was found to be incorrectly stated from testing performed. Assets that are held at current value were included in the 'Carried at historical cost' line. Also, the valuation movements for each year were included in the 'Valued at current value' lines when the actual balance at the 31 March should be included.
  - Our audit identified that not all assets are revalued in the 5-year cycle contrary to the Code of Practice. We reviewed all assets not captured and applied indices as provided by our auditors' expert (Gerald Eve LLP) against the last valuation date. This indicates that the value of these assets may be understated by approximately £2.8m. We consider that this represents a control weakness as well as being a potential understatement in the accounts.

Management's view was that the impact of the above was not material to the Council and will be considered for future years' property, plant and equipment valuations.

- In addition, we identified a number of other findings during the course of the financial statements audit:
  - An error on the original valuation report from the VOA was identified by management due to the Council Dwelling stock numbers used. The report has now been updated and the accounts were amended, resulting in a decrease to the revaluation gain of £2,373,360.
  - The impact of the McCloud/Sergeant ruling regarding age discrimination on pension liabilities. The legal ruling around age has implications for pension schemes where transitional arrangements on changing benefits were implemented, and this includes the Local Government Pension Scheme (LGPS). We discussed the implications of this with management and more widely with the sector as a whole to ensure consistency. Management obtained updated figures from the Pension Fund Actuary which resulted in an increase in the liability of £4,962,000 and a subsequent adjustment to the statement of accounts.
  - From testing performed it was identified that accumulated depreciation written back had been accounted for twice in the Property, Plant and

Equipment note (23). This inflated the 'revaluation to revaluation reserve' line and 'other movements in cost or valuation' line by an equal amount of £23,843,438.

- A manual adjustment of £6,177,000 was made to the face of the Comprehensive Income and Expenditure Accounts to reflect the income and expenditure split disclosed in the Housing Revenue Account. The manual adjustment had not been made during the accounts preparation to reflect the split disclosed in the Housing Revenue Account on the face of the CIES. This has no impact on the Net Expenditure or cash balances of the HRA.
- A number of other minor disclosure issues were identified and have been processed by management. To enhance the overall quality and presentation of the financial statements.
- We identified seven recommendations around Internal Audit, Provision for Doubtful Debts, Journals, Capital Commitments and Asset Revaluations.

**Based on our audit work to date, we are satisfied that the Council has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources**

Our consideration of the Council's arrangements to secure economy, efficiency and effectiveness has been based on the audit work undertaken on the accounts as well as placing reliance on the work completed under the Local Government (Wales) Measure 2009. Notwithstanding the above conclusion, the Auditor General is undertaking a review of Financial Sustainability that is due to report in December of this year. In addition, the WAO recently wrote to the Council expressing concern in relation to a breach of the Members' Code of Conduct and are intending to conduct a corporate governance review during the 2019-20 audit year. Any improvements required in arrangements will be contained in specific reports. More generally, the Auditor General will highlight areas where the effectiveness of arrangements to secure economy, efficiency and effectiveness in the use of resources has yet to be demonstrated or where improvements could be made when he publishes his Annual Improvement Report.

**We issued a certificate confirming that the audit of the accounts has been completed on 11 September 2019.**

**Our work to date on certification of grant claims and returns has not identified significant issues that would impact on the accounts or key financial systems.**

A more detailed report on our grant certification work will follow in January 2020 once this year's programme of certification work is complete.

The financial audit fee for 2018-19 is currently expected to be in line with the agreed fee set out in the Annual Audit Plan.

Yours sincerely



**Grant Thornton UK LLP  
For and on behalf of the Auditor General for Wales**

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**Reference:** 1577A2019-20

**Date issued:** November 2019

## Audit of Caerphilly County Borough Council's assessment of 2018-19 performance

### Certificate

I certify that I have audited Caerphilly County Borough Council's (the Council) assessment of its performance in 2018-19 in accordance with section 17 of the Local Government (Wales) Measure 2009 (the Measure) and my Code of Audit Practice.

As a result of my audit, I believe that the Council has discharged its duties under sections 15(2), (3), (8) and (9) of the Measure and has acted in accordance with Welsh Government guidance sufficiently to discharge its duties.

### Respective responsibilities of the Council and the Auditor General

Under the Measure, the Council is required to annually publish an assessment which describes its performance:

- in discharging its duty to make arrangements to secure continuous improvement in the exercise of its functions;
- in meeting the improvement objectives it has set itself;
- by reference to performance indicators specified by Welsh Ministers, and self-imposed performance indicators; and
- in meeting any performance standards specified by Welsh Ministers, and self-imposed performance standards.

The Measure requires the Council to publish its assessment before 31 October in the financial year following that to which the information relates, or by any other such date as Welsh Ministers may specify by order.

The Measure requires that the Council has regard to guidance issued by Welsh Ministers in publishing its assessment.

As the Council's auditor, I am required under sections 17 and 19 of the Measure to carry out an audit to determine whether the Council has discharged its duty to publish an assessment of performance, to certify that I have done so, and to report whether I believe that the Council has discharged its duties in accordance with statutory requirements set out in section 15 and statutory guidance.

## Scope of the audit

For the purposes of my audit work I will accept that, provided an authority meets its statutory requirements, it will also have complied with Welsh Government statutory guidance sufficiently to discharge its duties.

For this audit I am not required to form a view on the completeness or accuracy of information. Other assessment work that I will undertake under section 18 of the Measure may examine these issues. My audit of the Council's assessment of performance, therefore, comprised a review of the Council's publication to ascertain whether it included elements prescribed in legislation. I also assessed whether the arrangements for publishing the assessment complied with the requirements of the legislation, and that the Council had regard to statutory guidance in preparing and publishing it.

The work I have carried out in order to report and make recommendations in accordance with sections 17 and 19 of the Measure cannot solely be relied upon to identify all weaknesses or opportunities for improvement.



**Adrian Crompton**

**Auditor General for Wales**

CC: Julie James AM – Minister for Housing and Local Government  
Non Jenkins, Manager  
Gareth Jones, Performance Audit Lead





## AUDIT COMMITTEE – 28TH JANUARY 2020

**SUBJECT: OFFICERS DECLARATIONS OF GIFTS AND HOSPITALITY  
JULY TO SEPTEMBER 2019**

**REPORT BY: HEAD OF PEOPLE SERVICES**

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### **1. PURPOSE OF REPORT**

- 1.1 The purpose of the report is to provide the Audit Committee with information regarding the Register of Employees' Interests Forms completed by officers of the Council (excluding Schools) regarding Gifts and Hospitality for the period 1 July to 30 September 2019 ie the second quarter of the financial year 2019/2020 and a comparison with the previous three quarters.

### **2. SUMMARY**

- 2.1 Enclosed as Appendix 1 is a list of Register of Employees' Interests Forms in respect of Gifts and Hospitality completed by officers of the Council (excluding Schools) for the period 1 July to 30 September 2019.

### **3. RECOMMENDATIONS**

- 3.1 The Audit Committee are asked to note the contents of this report.

### **4. REASONS FOR THE RECOMMENDATIONS**

- 4.1 The recommendation is designed to ensure members of the Audit Committee have an oversight of the position in relation to officers' Gifts and Hospitality.

### **5. THE REPORT**

- 5.1 The Council's Code of Conduct for Employees sets out guidance for employees on a range of issues, including the completion of a Register of Employee Interests form, which help maintain and improve the high standards of conduct within Local Government and protect employees from misunderstandings and confusion.

- 5.2 Completed Register of Employees' Interests forms are submitted to Heads of Service, Directors or the Chief Executive who countersign the forms to show they are aware of the declaration. The form also records details of any controls / action taken to protect the Council's interests in the circumstances outlined on the form. A copy of the countersigned form is given to the employee and a copy sent to Human Resources for filing on the employee's personal file.
- 5.3 The Head of Service, Director or Chief Executive retains the original form and maintains a summary spreadsheet to record the forms. On a monthly basis the summary spreadsheet or a nil return is submitted to Human Resources for collation and monitoring for consistency and compliance.
- 5.4 In accordance with the Council's Code of Conduct for Employees, Gifts / Hospitality of less than £25 may be accepted by the employee but any Gift / Hospitality which could be seen by a third party as placing the employee under an improper obligation such as more than one Gift / Hospitality from the same party must be refused, irrespective of its value.
- 5.5 Employees may accept small offers of Hospitality only where the activity is of a nature where there is a genuine need to impart information or to represent the Council in the community. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where the Council should be seen to be represented.
- 5.6 The table below details the number of declarations regarding Gifts submitted by Directorate for the period 1 July to 30 September 2019 and the previous three quarters for comparison.

Directorate	Number of declarations received - Gifts			
	July – Sept 2019	April – June 2019	Jan – March 2019	Oct – Dec 2018
<b>Communities</b>	0	0	3	0
<b>Education and Corporate Services</b>	0	1	0	0
<b>Social Services and Housing</b>	1	5	1	6
<b>Total</b>	<b>1</b>	<b>6</b>	<b>4</b>	<b>6</b>

- 5.7 The table below details the number of declarations regarding Hospitality submitted by Directorate for the period 1 July to 30 September 2019 and the previous three quarters for comparison.

Directorate	Number of declarations received - Hospitality			
	July – Sept 2019	April – June 2019	Jan – March 2019	Oct – Dec 2018
Communities	0	4*	1	0
Education and Corporate Services	0	1	0	0
Social Services and Housing	0	0	0	0
<b>Total</b>	<b>0</b>	<b>5</b>	<b>1</b>	<b>0</b>

\* includes an Agency employee.

## 5.8 Conclusion

The Head of People Services will continue to monitor the declarations submitted and work with Heads of Service to improve their understanding, promote best practice and corporate compliance of the Code of Conduct where appropriate.

## 6. ASSUMPTIONS

- 6.1 There are no assumptions made within this report.

## 7. LINKS TO RELEVANT COUNCIL POLICIES

- 7.1 The Council's Code of Conduct for Employees confirms that in performing their duties, employees must act with integrity, honesty, impartiality and objectivity and that they must act in accordance with the principles set out in this Code, recognising the duty of all public sector employees to discharge public functions reasonably and according to the law. This is a Statutory Code requirement.

### 7.2 Corporate Plan 2018-2023

Whilst this report does not specifically contribute towards the Corporate Well-being Objectives, it does support good governance which is the foundation of the Council's performance management framework.

## 8. WELL-BEING OF FUTURE GENERATIONS

- 8.1 Having considered the five ways of working, they will not be affected by the contents of this report.

## **9. EQUALITIES IMPLICATIONS**

- 9.1 There are no equalities implications, as the reason for declaring an interest applies equally to all staff, regardless of their individual characteristics.

## **10. FINANCIAL IMPLICATIONS**

- 10.1 None.

## **11. PERSONNEL IMPLICATIONS**

- 11.1 The personnel implications are included in this report.

## **12. CONSULTATIONS**

- 12.1 There are no consultation responses that have not been included in the report.

## **13. STATUTORY POWER**

- 13.1 Local Government Act 2000.

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(donovl@caerphilly.gov.uk)

Consultees: Richard Edmunds, Corporate Director – Education & Corporate Services  
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Stephen Harris, Interim Head of Business Improvement & S151 Officer  
(harrisr@caerphilly.gov.uk)  
Cllr Colin Gordon, Cabinet Member for Corporate Services  
(gordocj@caerphilly.gov.uk)

Appendices:  
Appendix 1 Declarations of Gifts and Hospitality 1 July to 30 September 2019

**Appendix 1**  
**Declarations of Gifts and Hospitality 1 July to 30 September 2019**

Directorate	Service Area	Post Title of Employee Making the Declaration	Type of Declaration	Details Of Declaration	Post Title of Head of Service, Director or Chief Executive who authorised the declaration	Outcome
Social Services and Housing	Housing	Senior Administrator	Gift	House plant and thank you card from a tenant via a third party. Value not known.	Chief Housing Officer	Accepted

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## **AUDIT COMMITTEE – 28TH JANUARY 2020**

**SUBJECT: SIX MONTHLY UPDATE ON THE NUMBER OF COMPLAINTS RECEIVED UNDER THE COUNCIL'S CORPORATE COMPLAINTS POLICY**

**REPORT BY: HEAD OF DEMOCRATIC SERVICES & DEPUTY MONITORING OFFICER**

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### **1. PURPOSE OF REPORT**

- 1.1 To provide Members with an update on the number of complaints received under the Corporate Complaints Policy for the period 1<sup>st</sup> April 2019 to 30<sup>th</sup> September 2019.
- 1.2 To update Members on the use of the Policy and Procedure to deal effectively with unacceptable, persistent or unreasonable actions by complainants.

### **2. SUMMARY**

- 2.1 To provide members with an overview of the corporate complaints, which is one of the ways in which the Council gains information on the level of satisfaction or dissatisfaction of the services provided corporately by the Council. The result of the monitoring enables each department to focus on areas of concern, to improve services and to monitor performance and ensure that any trends in issues raised are identified and dealt with so as to be avoided in the future.
- 2.2 To update Members on the implementation of the Policy and Procedure to deal effectively with unacceptable, persistent or unreasonable actions by complainants.

### **3. RECOMMENDATIONS**

- 3.1 It is recommended that Members note the contents of the report.

### **4. REASONS FOR THE RECOMMENDATIONS**

- 4.1 To monitor the complaints process to ensure effective delivery of Council services.

### **5. THE REPORT**

- 5.1 The Council's Corporate Complaints Policy was adopted on 1<sup>st</sup> April, 2013, in order to reflect the model policy introduced by the Welsh Government at that time and was amended and updated in January 2016 and is available on the Council's website.

- 5.2 This Committee has received regular Reports on the complaints received under the Policy, details of which are set out in the background papers.
- 5.3 This report provides an update on the complaints received for the six month period 1<sup>st</sup> April, 2019 to 30<sup>th</sup> September, 2019.
- 5.4 Moving forward the Committee is advised that the Public Services Ombudsman for Wales has gained new powers under the Public Services Ombudsman for Wales Act 2019 which received Royal Assent in May 2019. The new Act makes it easier for people to complain, removing the barrier that a complaint to the Ombudsman must be in writing. For example, people can complain orally or through British Sign Language. It also allows the Ombudsman to start his own investigations (known as own-initiative investigations) without receiving a formal complaint where there is evidence to suggest there could be a wider public interest issue. A new Improvement Team has been introduced at the Ombudsman's office who will take on the "own initiative" investigations and will be in charge of a newly formed Complaints Standards Authority. The Complaints Standards Authority will develop standards for complaints handling across the bodies within the Ombudsman's jurisdiction and will gather data to identify trends and patterns in public service delivery. In addition it will offer training and support to complaints handlers in public bodies to support learning from complaints.

In addition, under the previous 2005 Public Services Ombudsman for Wales Act, a person had to make separate complaints to different organisations for public and private health treatment. The 2019 Act allows the Ombudsman to consider both the private and public elements, if without doing so, the Ombudsman is unable to completely investigate the relevant action by the public service provider.

The 2019 Act also includes provisions to enable a new Complaints Handling Process to be introduced. The Ombudsman's office has recently consulted on the new proposals, the outcome of which is currently under consideration. This Committee will receive a further update in the coming months on the proposal to adopt a new Complaints process prior to its presentation to Cabinet for formal adoption.

#### 5.5 **Six Monthly Review of Corporate Complaints**

- 5.5.1 The data referred to below represents the number of complaints received from 1<sup>st</sup> April, 2019 to 30<sup>th</sup> September, 2019 for each Directorate referred to, together with an overview of the response timescales.
- 5.5.2 In addition, the complaints data captured includes the outcome of each complaint, namely whether a complaint has been upheld, not upheld or partially upheld. An overview of the outcomes in respect of Stage 1 complaints are set out in paragraph 5.5.4(c) and an overview of the outcomes in respect of Stage 2 Complaints are set out in paragraph 5.5.4 (g) below.
- 5.5.3 The total number of corporate complaints received across the Authority during this period is **164** comprising the following:-



**total number of complaints received  
1<sup>st</sup> April 2019 – 30<sup>th</sup> September 2019**

Corporate	12
Education	2
Communities*	87
Housing	39
Social Services	22
Other (cross Directorate)	<u>2</u>
	164

\*formerly known as Environment

5.5.4 A breakdown of the types of complaints are summarised as follows:

(a) **Stage 1 Corporate Complaints**

Corporate Services	11
Education	2
Communities	75
Housing	35
Social Services	21
Other (cross directorate)	<u>-</u>
Total	144

(b) The total number of complaints received at Stage 1 were 144; of those 128 were responded to within timescale, 14 were outside the timescale and 2 did not proceed.

(c) Of those 144 Stage 1 complaints 32 were upheld, 84 were not upheld, 26 were partially upheld and 2 did not proceed. The breakdown of outcomes for each Directorate is listed below:

**Outcomes of Stage 1 Complaints**

	Upheld	Not Upheld	Partially Upheld	Did Not Proceed
Corporate Services	2	8	0	1
Education	0	1	1	0
Communities	27	26	21	1
Housing	2	29	4	0
Social Services	1	20	0	0
Other (cross Directorate)	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
	32	84	26	2

(d) **Stage 2 Corporate Complaints**

Corporate Services	2
Education	0
Communities	32
Housing	20
Social Services	2
Other (cross directorate)	<u>2</u>
	58

- (e) The total number of complaints dealt with at Stage 2 was 58 of those 55 were responded to within timescale and 3 did not meet the response deadline.
- (f) Of the Stage 2 complaints dealt with, 20 were commenced at Stage 2 and 38 were escalated from Stage 1 to Stage 2; 1 within Corporate Services, 16 within Housing, 1 within Social Services and 20 within the Communities directorate.
- (g) Of the 58 Stage 2 complaints responded to 9 were upheld, 37 were not upheld, 11 were partially upheld and 1 is ongoing. The breakdown of outcomes for each Directorate is listed below.

### Outcomes of Stage 2 Complaints

	Upheld	Not Upheld	Partially Upheld	Did Not Proceed	Ongoing
Corporate Services	0	2	0	0	0
Education	0	0	0	0	0
Communities	8	17	6	0	1
Housing	1	15	4	0	0
Social Services	0	1	1	0	0
Other (cross directorate)	0	2	0	0	0
	<u>9</u>	<u>37</u>	<u>11</u>	<u>0</u>	<u>1</u>

5.5.5 Members will note that 14 stage 1 complaints were not responded to within the required timescale, and 3 at Stage 2. The response times are being monitored and complaints officers have been asked to remind staff of the requirements to comply with the timescales and where this is not possible to seek agreement from the customer to extend the deadline for providing the response.

### 5.6 Review of Trends and Types of Complaints

5.6.1 There have been no trends identified, although it has been recognised that a large proportion of complaints dealt with by the Communities Directorate during this reporting period relates to waste services. The issues cover a cross section of matters including food waste, general waste, green bags, non- collection of general waste and commercial waste, changes to a specific waste collection service in the borough and assisted collections. Whilst these issues represented a large proportion of the matters dealt with as formal complaints, it must be borne in mind that the waste collection service is provided to residential and commercial properties throughout the County Borough and overall 10 million collections are undertaken each year. Nevertheless, irrespective of the number of complaints, officers have reviewed the reasons for the complaints and have identified that they are not isolated or systemic issues but rather a cross section of issues including the following; breakdown of vehicles, issues beyond the Council's control (such as parked cars obstructing the route for the refuse vehicle), administrative errors, the round had been reviewed, a change in vehicle and human error. A review of the Waste Service is nearing conclusion and arising from the review new processes and systems are being implemented in order to improve the service provided to the community, including investment in end to end digital processes designed to improve customer interaction and enhance service delivery.

5.6.2 Other types of complaints received during this six month period have been wide ranging for example hygiene in care home, hospital discharge, foster care finance, grass cutting, tree issue, a land issue, noise nuisance, street signs, overgrowth on footpath, dog waste bins, school transport, WHQS works, allocations, rent arrears, early years additional support, housing application, garages, rats at property and parking enforcement.

## **5.7 Ombudsman Referrals**

5.7.1 Since the last report to Audit Committee 23 complaints have been referred to the Ombudsman, 5 of which related to complaints dealt with under the separate Social Services Complaints Procedure which is outside the remit of this report. However for completeness all 5 were made prematurely but 2 early resolutions (quick fixes) were agreed. In relation to Corporate Complaints referred to the Ombudsman, there was 1 within Corporate, 5 within Housing, 9 within Communities & Leisure and 3 within Social Services. Of these 18 referrals 5 were made prematurely (ie without exhausting the Council's Corporate Complaints process), the Ombudsman decided not to investigate 12 of the referrals and 1 was taken into investigation.

## **6.1 Update On The Use Of A Vexatious Complainants Policy**

6.1.1 Members are advised that there have been no referrals made under this policy, although the officer hearing from Complaints Group will continue to monitor its use. The Group however acknowledge that it is a useful aide in dealing with potential vexatious complainants.

## **7. LINKS TO RELEVANT COUNCIL POLICIES**

7.1 Monitoring of the Council's corporate complaints and successful resolution of those complaints contributes to the following Well Being goals within the Well-being of Future Generations Act (Wales) 2015 as it supports the provision of higher quality and more effective services to the public across all service areas. In addition monitoring provides information on the level of satisfaction of the services provided corporately by the Council. The result of the monitoring enables each department to focus on areas of concern to improve services and to monitor performance, ensure that any trends or issues raised are identified and dealt with so as to be avoided in the future and to ensure that corporate complaints are dealt with consistently and fairly across all service areas.

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities and thriving Welsh Language
- A globally responsible Wales

## **8. WELL-BEING OF FUTURE GENERATIONS**

8.1 This report contributes to the Wellbeing Goals as set out in Links to Strategy above. It is consistent with the five ways of working as defined within the sustainable development principle in the Act in that the monitoring of the Council's corporate complaints handling across all service areas enables departments to focus on areas

of concern, to improve services and to monitor performance to ensure that any issues raised are identified and dealt with so as to be avoided in future.

## **9. EQUALITIES IMPLICATIONS**

- 9.1 Monitoring of complaints via the Corporate Complaints policy addresses the Council's statutory duties under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Welsh Language Measure (Wales) 2011 in two ways. It addresses specific complaints to the Council around alleged discrimination by service areas and also addresses the monitoring of complaints from people who fall under the categories protected by the statutory duties.
- 9.2 The full details of these issues (that cover wider matters than are recorded as Corporate Complaints in this report) are included in the annual reports provided to the Equalities and Human Rights Commission and the Welsh Language Commissioner's Office. Policy and Resources Scrutiny and cabinet consider these reports prior to being published.

## **10. FINANCIAL IMPLICATIONS**

- 10.1 There are no direct financial implications associated with this report.

## **11. PERSONNEL IMPLICATIONS**

- 11.1 There are no personnel implications associated with this report.

## **12. CONSULTATIONS**

- 12.1 The views of the consultees have been incorporated into this report.

## **13. STATUTORY POWER**

- 13.1 Public Services Ombudsman for Wales Act 2005 & 2019  
Local Government Act 1972-2003.

Author: Lisa Lane, Head of Democratic Services & Deputy Monitoring Officer  
Consultees: Christina HARRY Interim Chief Executive  
Dave Street, Director of Social Services and Housing  
Mark S Williams, Interim Director - Communities  
Richard (Ed) Edmunds, Corporate Director for Education and Corporate Services  
Robert Tranter, Head of Legal Services & Monitoring Officer  
Gemma Hoare, Housing Officer (Customer Services)  
Jan Carter, Housing Officer (Customer Services)  
Ruth Betty Customer Services Hub Manager  
Robert Waggett, Customer Services Development Officer  
Hayley Bowen, Customer Complaints Officer  
Karen Williams, PA to Chief Executive  
Kath Thomas, Customer Services/Complaints Officer  
Ros Roberts, Performance Manager

Andrea Jones, Corporate Complaints Officer  
Nicola Broom Customer Services Manager Social Services  
Anwen Cullinane, Senior Policy Officer – Equalities and Welsh Language  
Leigh Brook, PA to Director of Housing & Social Services  
Sian Wilkes, PA to Interim Corporate Director of Communities  
Lianne Fry, PA to Corporate Director for Education & Corporate Services

Background Papers:

Report to Audit Committee 11<sup>th</sup> June 2019 – Annual Review of Complaints received under the Council's Corporate Complaints Policy

Report to Audit Committee 24<sup>th</sup> July 2018 – Annual Review of Complaints received under the Council's Corporate Complaints Policy

Report to Audit Committee 30<sup>th</sup> January 2018 Update on the number of complaints received under the Council's Corporate Complaints Policy

Report to Audit Committee 14<sup>th</sup> June, 2017 – Update on the number of complaints received under the Council's corporate complaints policy

Report to Audit Committee 14<sup>th</sup> December, 2016 – Update on the numbers of complaints received under the Council's corporate complaints policy

Report to Audit Committee 9<sup>th</sup> March, 2016 - Update on the numbers of complaints received under the Council's corporate complaints policy

Report to Audit Committee 9<sup>th</sup> September, 2016 - Update on the numbers of complaints received under the Council's corporate complaints policy

Report to Audit Committee 11<sup>th</sup> March, 2015 - Update on the numbers of complaints received under the Council's corporate complaints policy

Report to Audit Committee 10<sup>th</sup> September, 2014 - Update on the numbers of complaints received under the Council's corporate complaints policy

Report to Audit Committee 5<sup>th</sup> March, 2014 - Update on the numbers of complaints received under the Council's corporate complaints policy

Report to Audit Committee 17<sup>th</sup> September, 2013 - Update on the numbers of complaints received under the Council's corporate complaints policy.

# Agenda Item 14

## MINUTES

### CORPORATE GOVERNANCE PANEL

Held on Tuesday 24<sup>th</sup> September 2019 in Room  
1.3 at Penallta House

Panel members present

Cllr M Sargent, Cllr B Jones, Ed Edmunds (EE), S Harris (SH), L Lucas (LL)  
and R Harris (RH)

#### 1. APOLOGIES

1.1 Apologies were received from R Tranter

#### 2. MINUTES

2.1 The minutes of the previous meeting held on the 2<sup>nd</sup> April which were presented to the Audit Committee in June 2019 were accepted.

#### 3. UPDATE/REMINDER OF OUTCOME OF 18/19 PROCESS

3.1 RH reminded the panel of the three areas that went into the final Annual Governance Statement for 18/19.

3.2 RH confirmed that the updated local code of corporate governance has been to the Audit Committee and CMT and is due to go to Cabinet on 2<sup>nd</sup> October.

3.3 RH explained that the Audit Committee suggested that a representative from the Audit Committee should be part of the AGS review panel and Cllr Sargent has taken on the role.

#### 4. ACTION PLAN FOR 18/19 AFI's

4.1 The panel were introduced to a new action plan and it was agreed to complete the initial population of the necessary actions that will form the basis of the panel's ongoing review and assessment of satisfactory completion facilitating the decision process on whether or not topic area(s) can be removed from the next governance statement. SH to provide some narrative for two topic areas.

4.2 It was also agreed that RH would maintain a live list within the action plan of topics or areas that the panel want to discuss or explore further.

#### 5. LESSONS LEARNED FROM LAST YEARS PROCESS

5.1 Follow up work arising from the checklist process was discussed and SH will liaise with RH to go through the issues raised by the ex-insurance manager. LL provided an update on the procurement comments and RH will follow up with the Head of HR in respect of her area.

5.2 Last years oversight of contract mgt processes is to continue and RH confirmed that it has been added to the Head of Service checklist. RH is also to add onto the action plan sub list to ensure that it stays on the panel's radar.

5.3 RH informed the panel that the response to the school's annual return/ checklist had been good. Arrangements are in hand to chase up those outstanding. The panel also asked for an analysis of the responses to enable a view to be taken on common themes or gaps identified.

5.4 RH raised the need for the panel to consider the next stage of the assurance process in relation to partnerships & collaborations. Having recently refined the list of partnerships / collaborations the panel needs to agree on what assurance it needs to satisfy itself in respect of the councils overall governance. SH to provide an up to date list of partnerships/ collaborations for the panel to review and consider how best to proceed.

## **6. Local Code review**

6.1 With the use of two handouts RH introduced a piece of work that was previously undertaken to verify and evidence the Councils compliance with its own local code of governance. Following discussion it was agreed that the current panel should undertake a similar exercise to both update the formal local code and to evidence ongoing compliance. RH to schedule a meeting in December at which the panel will go through the 'deliverable measures' and the 'current position with compliance'.

## **7. Audit Comm. forward work programme**

7.1 A draft forward work programme was discussed and agreed.

## **8. AOB**

8.1 Following agreement by Cabinet on 2nd October RH to amend the panel Terms of Reference and the assurance framework to reflect the Audit Committee representation on the AGS panel. 6.2

## **9. FUTURE MEETING DATES**

9.1 The next meeting was to be arranged for December 2019





## **SOCIAL SERVICES SCRUTINY COMMITTEE – 22ND OCTOBER 2019**

**SUBJECT: WALES AUDIT OFFICE REVIEW OF THE COUNCIL'S  
CORPORATE SAFEGUARDING ARRANGEMENTS**

**REPORT BY: CORPORATE DIRECTOR FOR SOCIAL SERVICES AND HOUSING**

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### **1. PURPOSE OF REPORT**

- 1.1 To advise Scrutiny Committee of the Wales Audit Office (WAO) Review of Corporate Safeguarding Arrangements within Caerphilly County Borough Council undertaken in May 2019 and report on the implementation of an action plan in response to the recommendations made by the Review.

### **2. SUMMARY**

- 2.1 The WAO undertook a follow up review of Corporate Safeguarding Arrangements for Children in Caerphilly in May 2019. The subsequent report was presented to Corporate Management Team for approval in June 2019 and the Performance Audit Manager from WAO also presented the report findings to the Corporate Safeguarding Board in June 2019.

- 2.2 The Review report is attached as Appendix 1 and concluded that;

*Although the Council has made some progress in addressing our previous recommendations, the Council needs to further strengthen its corporate safeguarding oversight and assurance arrangements*

- 2.3 In response, the Council was required to complete a Management Response and this is attached for information at Appendix 2. This document refers to the strategic recommendations made in the Review. The Corporate Safeguarding Board has developed an action plan to address both the strategic recommendations made and the areas of good practice for consideration identified in the Review and this is attached as Appendix 3. The WAO Auditor acknowledged that there were many positive developments in place and planned to address the areas for improvement but because some of them were yet to be fully realised, their conclusion was that further work is needed to strengthen corporate governance and oversight.

- 2.4 It is really important to note that this was a review of the corporate governance of safeguarding arrangements and did not consider safeguarding children practice and

procedure.

- 2.5 The content of this report was considered and approved by Cabinet on 18<sup>th</sup> September 2019.

### **3. RECOMMENDATIONS**

- 3.1 Scrutiny Committee are requested to note the content of the WAO Review report and the progress made in implementing the recommendations detailed in the Council's Action Plan.

### **4. REASONS FOR THE RECOMMENDATIONS**

- 4.1 To ensure Scrutiny Committee is fully aware of the findings of the WAO Review and supports the Corporate Safeguarding Board to oversee implementation of the Action Plan.

### **5. THE REPORT**

- 5.1 The full WAO Review Report is attached as Appendix 1 for information.
- 5.2 The Review identifies 5 areas for improvement in line with the National Recommendations published in 2015. The Council's Management Response to the Review is attached for information at Appendix 2.
- 5.3 However, in addition, the Review identified good practice that the council could consider and the Corporate Safeguarding Board agreed to include all these good practice areas in the detailed Action Plan that is attached as Appendix 3.
- 5.4 Committee Members will be able to note that many of the actions identified are relatively straight forward to implement and achieve and as a result the timescales set are within the current financial year.
- 5.5 The key findings fall into the following themed areas:

#### **Corporate Safeguarding Board:**

- increased frequency of meetings
- increased performance reporting
- development of a Training Framework for all service areas
- development of a self assessment tool
- consider the inclusion of Corporate Safeguarding on Risk Registers
- improved access to the policy and the Annual Report

#### **Designated Safeguarding Officers:**

- complete the self-assessment tool
- implement the Training Framework

#### **Human Resources:**

- implement the Safer Recruitment Policy
- develop a tracking system for DBS checks for all staff who require them
- support the implementation of the Training Framework through the use of

ITrent or an alternative Learning Management System (LMS).

**Procurement and Contract Monitoring:**

- ensuring contractors and volunteers have received appropriate training and DBS checks

**Internal Audit:**

- Staff to be trained
- Role to be clarified

5.6 The Corporate Safeguarding Board will oversee the implementation of the Action Plan and will report progress made in their 2019/20 Annual Report.

**6. ASSUMPTIONS**

6.1 There are no assumptions made or presumed in this report.

**7. LINKS TO RELEVANT COUNCIL POLICIES**

7.1 Social Services & Well Being (Wales) Act 2014

7.2 Cabinet Commitment – to protect the most vulnerable people in our society and make safeguarding a key priority

7.3 **Corporate Plan 2018-2023.**

The content of this report contributes towards Well Being Objective 6: Support citizens to remain independent and improve their well-being

**8. WELL-BEING OF FUTURE GENERATIONS**

8.1 The content of this report contributes to the following Well Being Goals:

- A resilient Wales
- A more equal Wales
- A Wales of cohesive communities

The report is consistent with the five ways of working as defined within the sustainable development principle in the Act as follows:

- Long Term – safeguarding children, young people and vulnerable adults is and always will be a priority for the Council and it is essential that all employees, volunteers and contractors fully understand their personal and professional responsibility to safeguard vulnerable individuals.
- Prevention – robust Corporate Safeguarding arrangements should help prevent the escalation of need and subsequent demand on higher tier statutory services
- Integration – Caerphilly’s Corporate Safeguarding Policy reinforces that safeguarding children, young people and vulnerable adults is everybody’s business within Caerphilly
- Collaboration – the Corporate Safeguarding Board and the Designated Safeguarding Officers (DSO) Development Group ensures that every service area is represented, has a DSO identified and provides training and support to those DSO’s to fulfil their corporate safeguarding responsibilities.

- Involvement – the Corporate Safeguarding Board consists of representatives from key service areas to ensure that there is a whole Council approach to safeguarding.

## **9. EQUALITIES IMPLICATIONS**

- 9.1 This report is for information purposes only, so the Council's full Equality Impact Assessment process does not need to be applied.

## **10. FINANCIAL IMPLICATIONS**

- 10.1 There are no funding implications arising from this report.

## **11. PERSONNEL IMPLICATIONS**

- 11.1 There are no personnel or HR implications arising from this report.

## **12. CONSULTATIONS**

- 12.1 The report is for information purposes and reflects the views of consultees.

## **13. STATUTORY POWER**

- 13.1 Social Services & Well Being (Wales) Act 2014

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Appendices:

1. Wales Audit Office – Follow-up Review of Corporate Arrangements for the Safeguarding of Children – Caerphilly County Borough (June 2019)
2. Caerphilly County Borough Council – Management Response (June 2019)
3. Caerphilly Corporate Safeguarding Board Action Plan (June 2019)

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# Follow-up review of corporate arrangements for the safeguarding of children – **Caerphilly County Borough Council**

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The team who delivered the work comprised Gareth Jones, managed by Non Jenkins under the direction of Huw Rees.



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## Summary

### What we reviewed and why

- 1 We undertook this review to seek assurance that the Council has effective corporate arrangements in place for safeguarding children. We considered the findings of our 2014 report into the Council's arrangements to support safeguarding of children<sup>1</sup>. We also considered the Council's progress in implementing the recommendations contained in the Auditor General's report, 'Review of Corporate Safeguarding Arrangements in Welsh Councils' (July 2015)<sup>2</sup>.
- 2 We undertook the review during May 2019. The Council provided a self-assessment of its progress in addressing the recommendations and proposals for improvement made in 2014 and 2015. The Council provided documents to support its self-assessment. We then interviewed key officers and the lead member for Corporate Safeguarding.
- 3 Our review has been limited to reviewing the Council's self-assessment of its progress against our previous recommendations and proposals for improvement. We have not tested the effectiveness of the Council's safeguarding arrangements in practice as part of this review.

### What we found

- 4 Our review sought to answer the question: **Has the Council acted upon the recommendations and proposals for improvement contained in the national and local reports of the Auditor General published in 2014 and 2015?**
- 5 Overall we found that: **Although the Council has made some progress in addressing our previous recommendations, the Council needs to further strengthen its corporate safeguarding oversight and assurance arrangements.**
- 6 Based on the work we have done, the Council needs to further strengthen its oversight and assurance of its corporate safeguarding arrangements. In particular, the Corporate Safeguarding Board has a very extensive remit but only meets annually. The Council does not currently include Safeguarding in its corporate risk register nor service area risk registers. The Council should strengthen the oversight of the assurance provided by its Corporate Safeguarding Board to ensure that the Council's procedures for safeguarding children and adults are robust. The role of the Cabinet, Audit Committee, Internal Audit and Scrutiny in relation to Corporate Safeguarding need to be clarified.
- 7 The Council's Cabinet commitments include safeguarding as a key priority, and the

<sup>1</sup> Auditor General for Wales, **Local Authority Arrangements to Support Safeguarding of Children – Caerphilly County Borough Council**, October 2014

<sup>2</sup> **Auditor General for Wales, Review of Corporate Safeguarding Arrangements in Welsh Councils**, July 2015

Council's ethos is that 'Safeguarding is Everybody's Business.' However, it has yet to fully address a number of our previous national recommendations as shown below. **Exhibit 2** that follows sets out our assessment of the Council's progress in implementing each national recommendation and local proposal for improvement.

**Exhibit 1: National recommendations that have yet to be fully addressed**

The table below sets out the national recommendations that the Council has not yet fully addressed

<b>National recommendations that have yet to be fully addressed</b>
<p><b>R3</b> Strengthen safe recruitment of staff and volunteers by:</p> <ul style="list-style-type: none"> <li>• ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;</li> <li>• creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and</li> <li>• requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement.</li> </ul>
<p><b>R4</b> Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p> <ul style="list-style-type: none"> <li>• ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;</li> <li>• creating a corporate-wide system to identify, track and monitor compliance on attending safeguarding training in all council departments, elected members, schools, governors and volunteers; and</li> <li>• requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and young people to undertake safeguarding training.</li> </ul>
<p><b>R6</b> Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and council-wide set of performance information covering:</p> <ul style="list-style-type: none"> <li>• benchmarking and comparisons with others;</li> <li>• conclusions of internal and external audit/inspection reviews;</li> <li>• service-based performance data;</li> <li>• key personnel data such as safeguarding training, and DBS recruitment checks; and</li> <li>• the performance of contractors and commissioned services on compliance with council safeguarding responsibilities.</li> </ul>
<p><b>R7</b> Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p>
<p><b>R8</b> Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council.</p>

**Exhibit 2: assessment of the Council's progress in addressing the national recommendations**

The table below sets out our assessment of the Council's progress in addressing the national recommendations and local proposals for improvement.

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p><b>R1</b>                      Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ol style="list-style-type: none"> <li>1. the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements;</li> <li>2. the appointment of a lead member for safeguarding; and</li> <li>3. regularly disseminating and updating information on these appointments to all staff and stakeholders.</li> </ol>	<p><b>Summary – Fully met</b></p> <p>The Council has improved corporate leadership and compliance with Welsh Government policy on safeguarding through:</p> <ol style="list-style-type: none"> <li>1. appointing a senior lead officer (Director of Social Services and Housing) who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements;</li> <li>2. appointing a lead member for safeguarding (Cabinet Member for Social Services &amp; Housing); and</li> <li>3. regularly disseminating and updating information on these appointments to all staff and stakeholders.</li> </ol> <p>The Council could consider the following options to further strengthen its arrangements:</p> <ul style="list-style-type: none"> <li>• ensuring that the Corporate Safeguarding Policy is more easily accessible from the main Council Intranet page and not solely through the Children's Services pages;</li> <li>• ensuring that Designated Safeguarding Officers' contact details are displayed prominently on service area intranet pages;</li> <li>• ensuring visibility of key officers and the lead member on intranet pages and in training materials; and</li> <li>• collecting ongoing data about staff and stakeholders' awareness of the key Corporate Safeguarding roles.</li> </ul>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p><b>Local Proposal for Improvement 2</b></p> <p>The Council should clarify who designated officers with responsibility for safeguarding are.</p>	<p><b>Summary – Fully Met</b></p> <p>The Council has clarified who the designated officers with responsibility for safeguarding are and this is outlined in the policy clearly as shown below:</p> <p><b>The Chief Executive</b></p> <p>4.1 The Chief Executive has overall responsibility for ensuring arrangements for safeguarding of children and adults are effective across the Council. The Chief Executive is responsible for developing effective governance arrangements and ensuring there is an effective safeguarding policy in place.</p> <p>4.2 Through one to one meetings with the Corporate Director of Social Services, the Chief Executive is kept informed of relevant safeguarding issues.</p> <p>4.3 In addition, any exceptional matters relating to safeguarding could be reported to the G7 meeting by the Chief Executive. The G7 is a strategic meeting of the Chief Executives of the five Gwent Local Authorities, the Police and the Health Board.</p> <p><b>Lead Member for Safeguarding (Cabinet Member for Social Care and Wellbeing)</b></p> <p>4.4 The Lead Member for Safeguarding is responsible for providing political scrutiny to ensure the Council fulfils its duties and responsibilities for safeguarding. The Lead Member will chair the Corporate Safeguarding Board and support Elected Members to scrutinise and appropriately challenge the safeguarding performance of the Council.</p> <p>4.5 The Lead Member will be briefed on any sensitive cases that may be considered for Child or Adult Practice Reviews or may otherwise become a matter of public interest. The Lead Member will periodically visit front line services to meet with staff and managers</p> <p><b>Statutory Director of Social Services</b></p> <p>4.9 The Statutory Director of Social Services has final and ultimate responsibility for ensuring the Council has appropriate safeguarding measures in place to protect children, young people and vulnerable adults. The Statutory Director is responsible for reporting the effectiveness of these arrangements on a corporate level to the Chief Executive, Corporate Management Team and to Elected Members.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>4.10 The Statutory Director is the point of contact for all other Corporate Directors to report serious safeguarding concerns which may occur in their own service areas. The Statutory Director is responsible for ensuring appropriate action is taken including reporting to the Chief Executive and the Lead Cabinet Member as necessary.</p> <p>4.11 The Director delegates the lead responsibility for operational and strategic safeguarding to the Assistant Directors for Adult Services and Children's Services. The Assistant Directors ensure the Director is kept informed of safeguarding issues through one to one meetings and as the need may arise outside these meetings.</p> <p>4.12 The Director is responsible for providing an Annual Report to the Council and CSSIW on the progress and performance of Social Services which includes the effectiveness of safeguarding arrangements.</p>
<p><b>R2</b> Ensure there is a corporate-wide policy on safeguarding covering all council services to provide a clear strategic direction and clear lines of accountability across the council.</p>	<p><b>Summary – Fully Met</b></p> <p>The Council's Corporate Safeguarding Policy states that 'Safeguarding is Everybody's Business' and it covers;</p> <p>'all Council and education employees, Elected Members, Volunteers and contractors. While employees, Elected Members, volunteers and contractors are likely to have varied level of contact with children, young people and vulnerable adults as part of their duties, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns.'</p> <p>Safeguarding is also a key priority within the Cabinet's commitments.</p> <p>The Council's policy was last updated in 2018 and reflects a range of Safeguarding related topics including modern day slavery, child sexual exploitation, counter terrorism and the risk of radicalisation, Violence against Women, Domestic Abuse and Sexual Violence and these topics are covered in the training materials.</p> <p>The Council has recently introduced a self-assessment toolkit for all service areas to complete around safeguarding which reinforces the responsibilities of all service areas.</p> <p>Designated Safeguarding Officers are in all public facing service areas to help with distributed leadership on Safeguarding. These officers provide a lead on Safeguarding within their service areas.</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	<p>The Council could consider the following options to further strengthen its arrangement:</p> <ul style="list-style-type: none"> <li>revising its policy statement to enable the existing Designated Safeguarding Officers to be a council wide resource and not only appointed for deployment in specific service areas where there is direct contact with the public. This would better promote the Council's ethos that safeguarding is 'Everybody's Business'.</li> <li>revising its Corporate Safeguarding Policy to ensure that the role of Internal Audit, Audit Committee, Scrutiny and Cabinet are clarified.</li> </ul>
<p><b>Local Proposal for Improvement 1</b> Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding.</p>	<p><b>See narrative above</b></p>
<p><b>R3</b> Strengthen safe recruitment of staff and volunteers by:</p> <ol style="list-style-type: none"> <li>ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;</li> <li>creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and</li> <li>requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are</li> </ol>	<p><b>Summary – Partially met</b></p> <p>The Council has acted to ensure that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children. It has created an integrated corporate compliance system to record and monitor compliance levels on DBS checks for staff.</p> <p>The Council has developed a useful draft Safer Recruitment policy that better reflects the Corporate Safeguarding Policy and should ensure that when recruiting staff and volunteers the Council is ensuring that safe recruitment is embedded consistently.</p> <p>The Council's Human Resources team has reviewed all posts and considered the level of DBS check required for all posts across all service areas and the HR team monitor any proposed changes to those agreed checks, for example, when post holders change.</p> <p>The Council sets out in its contractual agreements that commissioned services are required to undertake safe recruitment practices .</p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p>underpinned by a contract or service level agreement.</p>	<p>However, at the time of our fieldwork we found that:</p> <ul style="list-style-type: none"> <li>• there is not a council wide approach to monitoring the compliance of contractors with safe recruitment practices. Monitoring arrangements are set within service areas. The Council's safer recruitment policy was yet to be finalised, agreed and applied.</li> <li>• although the Council has developed an integrated system to oversee DBS checks and safer recruitment checks for employees it has yet to establish a central system to oversee those checks for volunteers and contractors.</li> </ul> <p>As such, the Council has further work to do to fully address this national recommendation. In doing so, the Council should also look to:</p> <ul style="list-style-type: none"> <li>• ensure that its monitoring systems enable tracking of safe recruitment for volunteers and contractors as well as staff;</li> <li>• strengthen its arrangements for monitoring that services commissioned by the Council undertake safe recruitment practices; and</li> <li>• ensure that all managers undertake training on the revised safe recruitment process and highlighting the need to ensure safe recruitment of volunteers and contractors.</li> </ul>
<p><b>R4</b> Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p> <ol style="list-style-type: none"> <li>1. ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;</li> <li>2. creating a corporate-wide system to identify, track and monitor compliance on attending safeguarding training</li> </ol>	<p><b>Summary – Partially Met</b></p> <p>The Council's Corporate Safeguarding Policy places a responsibility on Corporate Directors to ensure that staff within their Directorates are appropriately trained to identify and respond to safeguarding concerns. The Council's Corporate Safeguarding Policy is provided in hard copy to all newly appointed staff and those staff must sign to confirm receipt of the policy.</p> <p>Although safeguarding training is not mandated for elected Members, the Council has taken proactive steps to ensure that Members receive basic safeguarding training. The Council has arrangements to ensure that those Members who are unable to attend those sessions are made aware of the Council's Corporate Safeguarding policy and training materials.</p>



Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p>3. in all council departments, elected members, schools, governors and volunteers; and requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and young people to undertake safeguarding training</p>	<p>However,</p> <ul style="list-style-type: none"> <li>• the Council does not currently mandate safeguarding training to staff in all relevant services areas. As a result, the Council's Designated Safeguarding Officers group has developed a revised training framework with training appropriate to the level of contact staff have with children. This new framework will be implemented by the end of 2019.</li> <li>• Designated Safeguarding Officers currently deliver training in their service areas. Whilst this approach ensures that all staff, including those who do not have regular access to a computer, receive training, the Council has recognised that the recording of this training information has been inconsistent to date and is now acting to address this.</li> <li>• The Council's Safeguarding policy is less clear on the requirement to ensure that relevant staff in partner organisations who are commissioned/contracted to work on behalf of the Council in delivering services to children and young people should undertake safeguarding training.</li> </ul> <p>As such, the Council has further work to do to fully address this national recommendation.</p> <p>In doing so, the Council should also look to:</p> <ul style="list-style-type: none"> <li>• ensure that staff training is recorded consistently to enable refresher training to be undertaken in a timely fashion;</li> <li>• agree a minimum timescale within which staff, volunteers and contractors undertake basic initial training upon appointment;</li> <li>• ensure that its monitoring systems enable tracking of training for volunteers and contractors as well as staff;</li> <li>• report the take up of initial and refresher training in the revised training framework to the Corporate Safeguarding Board;</li> <li>• collate a percentage breakdown of safeguarding training (initial and refresher) compliance for staff in each service area and for volunteers and contractors;</li> <li>• explore the use of e-learning as part of its training framework; and</li> <li>• clarify how safeguarding training for contractors will be monitored.</li> </ul>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p><b>Local Proposal for Improvement 4</b> Ensure all elected members and staff who come into contact with children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding. This should also include volunteers.</p>	<p><b>See narrative above</b></p>
<p><b>R6</b> Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and council-wide set of performance information covering:</p> <ul style="list-style-type: none"> <li>• benchmarking and comparisons with others;</li> <li>• conclusions of internal and external audit/inspection reviews;</li> <li>• service-based performance data;</li> <li>• key personnel data such as safeguarding training, and DBS recruitment checks; and</li> <li>• the performance of contractors and commissioned services on compliance with council safeguarding responsibilities</li> </ul>	<p><b>Summary – Partially Met</b></p> <p>The Council's Corporate Safeguarding Policy sets out that the Cabinet has delegated responsibility 'for monitoring the effectiveness of safeguarding arrangements across the Council' and the production of the Annual Corporate Safeguarding report to the Council's Corporate Safeguarding Board.</p> <p>The Corporate Safeguarding Board has a clear and comprehensive remit as set out in the Corporate Safeguarding Policy. The Board's terms of reference can be found in <a href="#">Appendix 1</a>.</p> <p>A key aspect of the Board's responsibilities is to monitor the effectiveness of safeguarding arrangements across the Council and to act strategically to assure the Council that procedures for managing safeguarding concerns are robust.</p> <p>The Annual Corporate Safeguarding Report is published on the elected Members' Portal for information and can be 'called in' to scrutiny by any elected Member</p> <p>The Council has recently introduced a self-assessment process for Designated Safeguarding Officers to complete in their service areas. Those self assessments will not be returned until after the 2019 annual meeting of the Corporate Safeguarding Board. The Council acknowledges that it could use the Red, Amber, Green ratings provided in the self assessments to inform the 2019-20 Annual Corporate Safeguarding report as well as improvement actions across the Council during 2019-20.</p> <p>However,</p> <ul style="list-style-type: none"> <li>• it is unclear how the Corporate Safeguarding Board discharges its full oversight and assurance remit given that it meets once a year to receive a draft of and agree the Annual Corporate Safeguarding report.</li> </ul>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
	<ul style="list-style-type: none"> <li>• the Annual Safeguarding Board's report has not been called into scrutiny to date and neither Cabinet nor Audit Committee receive a report in relation to the effectiveness of Corporate Safeguarding arrangements.</li> <li>• the Corporate Safeguarding Board's report does not currently provide sufficient assurance to the Council that its procedures for managing safeguarding concerns are robust. The 2018 report focussed mainly on operational issues rather than the strategic overview that the Board is responsible for.</li> <li>• the data due to be reported in the Board's 2018-19 Annual report whilst relevant to Safeguarding does not reflect the broader safeguarding activity undertaken by the Council and does not as previously recommended;</li> <li>• provide benchmarking and comparisons with other Councils;</li> <li>• refer to the conclusions of internal and external audit / inspection reviews;</li> <li>• provide service-based performance data;</li> <li>• provide clear data on safeguarding training undertaken and also safe recruitment processes; and</li> <li>• outline the performance of contractors, partners and volunteers on compliance with council safeguarding responsibilities.</li> </ul> <p>As such, the Council has further work to do to fully address this national recommendation to assure itself that it has robust oversight and assurance of the effectiveness of its safeguarding arrangements.</p> <p>In doing so, the Council should also look to:</p> <ul style="list-style-type: none"> <li>• ensure that the Corporate Safeguarding Board is supported to discharge its responsibilities effectively;</li> <li>• ensure effective oversight of the annual Corporate Safeguarding report to provide assurance; and</li> <li>• develop a wider set of performance measures as previously recommended to reflect the Corporate Safeguarding Policy's intentions and provide greater assurance around the operation of the policy.</li> </ul>
<p><b>Local Proposal for Improvement 3</b>          Improve the range, quality and coverage of safeguarding performance reporting to members to provide adequate assurance that corporate arrangements are working effectively.</p>	<p><b>See narrative above</b></p>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<p><b>R7</b> Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p>	<p><b>Summary – Partially met</b></p> <p>The Council has established a programme of regular safeguarding audits across schools which are undertaken on a three yearly cycle and those provide insight and assurance around safeguarding in schools. Summary reports are then provided to senior leaders on the outcomes of those audits.</p> <p>Internal Audit consider that safeguarding considerations are embedded in each of their audits.</p> <p>However,</p> <ul style="list-style-type: none"> <li>• Apart from its approach to safeguarding audits in schools, the Council has not clearly established a rolling programme of internal audit reviews to test systems and compliance with the Council's Corporate safeguarding policy.</li> <li>• we did not find evidence of a regular mechanism for Internal Audit to share Safeguarding related issues with lead Corporate Safeguarding officers or to inform the Annual Corporate Safeguarding report, or the Audit Committee that governance arrangements for safeguarding are robust.</li> <li>• whilst the Council's annual governance statement process requires heads of service to provide assurance around staff being aware and receiving training around Corporate Safeguarding, this assurance only focusses on staff and does not provide assurance relating to volunteers and contractors so does not fully reflect the scope of the Council's own Corporate Safeguarding policy.</li> </ul> <p>As such, the Council has further work to do to fully address this national recommendation.</p> <p>In doing so, the Council should also look to:</p> <ul style="list-style-type: none"> <li>• clarify the role of Internal Audit and Audit Committee in relation to assuring the effective operation and governance of Corporate Safeguarding arrangements, including within the Corporate Safeguarding Policy;</li> <li>• ensure that relevant information and insight from Internal Audit's programme of work is shared and feeds into the Council's oversight and assurance framework for safeguarding including with the Corporate Safeguarding Board; and</li> <li>• provide safeguarding training and refresher training to Internal Audit Staff.</li> </ul>

Recommendation from the 2015 report	Wales Audit Office assessment of Council's progress
<ul style="list-style-type: none"> <li>• <b>Local Proposal for Improvement 5</b> Identify and agree an appropriate internal audit programme of work for safeguarding.</li> </ul>	<p><b>Partially met (see above narrative)</b></p>
<p><b>R8</b> Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council.</p>	<p><b>Summary – Not met</b></p> <ul style="list-style-type: none"> <li>• The Council does not include safeguarding as one of its Corporate Risks and it is not part of Children's Services risk register.</li> <li>• The Council has not provided clear evidence of safeguarding risks being considered at a either corporate and service level. In part, the Council considers that in Social Services and Education safeguarding is viewed as being embedded within the service areas' activities. However, evidence provided shows that there is limited contract monitoring that focusses on safeguarding aspects.</li> <li>• The Council's recently introduced self-assessment tool may provide some insight into risks that exist across service areas, but the Council has not yet articulated how it will use that evidence to develop its approach to safeguarding risks.</li> </ul> <p>The Council has therefore not made progress in addressing this national recommendation.</p>

# Appendix 1

## Corporate Safeguarding Board

### Terms of Reference

#### Purpose

The responsibility for maintaining an overview of safeguarding arrangements across the Council has been delegated to the Corporate Safeguarding Board by Cabinet.

The Main responsibilities of the Board are to ensure that robust arrangements for safeguarding children and adults are in place within and across the Council.

#### Membership of the Board:

- Lead Member for Corporate Safeguarding (Chair)
- The Designated Safeguarding Officers from each Service area
- Assistant Director – Children's Services
- Education Safeguarding Lead
- Service Manager – Safeguarding, Social Services
- Workforce Development Manager
- Legal Services
- Other Officers will be co-opted as required and agreed by the Group

#### Key responsibilities of the Board will be to:

- Assure Cabinet that the Council's procedures for safeguarding children and adults are robust.
- Ensure cross Directorate / interdepartmental working and corporate communication in relation to safeguarding is effective.
- Support the functions and duties of the Statutory Director for Social Services.
- Approve policies and guidelines for safeguarding for each Service area of the council and receive information about their respective performance management arrangements in relation to their safeguarding responsibilities to ensure compliance with relevant legislation and statutory guidance.
- Ensure the Designated Safeguarding Officers are supported to collaborate and share information and to identify any gaps in the Council's safeguarding policies and procedures.
- Identify and resolve any barriers that could prevent the implementation of effective safeguarding procedures.

- Identify any gaps in Corporate policies and guidelines and ensure they are addressed.
- Ensure effective working relationships are maintained with the Regional Safeguarding Boards (Children's and Adults) and the Business Unit.
- Ensure appropriate training is available for Officers and Elected Members.
- Receive and consider corporate safeguarding performance information and identify any actions required.
- Receive and consider information about trends in relation to allegations of professional abuse and adopt action plans to respond to any issues should the need arise.
- Consider the implications of any Child or Adult Practice Review or Domestic Homicide Review and ensure that the Council responds effectively to recommendations as they may apply to the Council.
- Periodically review and update the Corporate Safeguarding Policy and the content of the Intranet Portal.
- Produce an Annual Report.

**Meeting conduct:**

- The meetings will be held annually.
- The meetings will be chaired by the Lead Member for Corporate Safeguarding.
- The meetings will be administered by Children's Services Business Support.
- All members are able to submit items for consideration.
- Agenda, minutes and relevant papers will be circulated ahead of the meetings.
- Membership and Terms of Reference for the Board will be reviewed annually/or as required.

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## Management Response

## Appendix 2

**Local Authority:** Caerphilly County Borough Council

**Report title:** Corporate Safeguarding arrangements for children follow up

**Issue date:** June 2019

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Ref	Proposal for Improvement	Intended outcome/ benefit	High priority (yes/no)	Accepted (yes/no)	Management response	Completion date	Responsible officer
	<p><b>R3</b> Strengthen safe recruitment of staff and volunteers by:</p> <ul style="list-style-type: none"><li>ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children;</li><li>creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks;</li></ul>	Ensure that the Council can assure itself that safe recruitment is carried out across all relevant service areas, including the use of contractors and volunteers	Yes	Yes	<p>Implement Safer Recruitment Policy across the Council</p> <p>Internal Audit to monitor compliance in any audit work undertaken</p> <p>HR systems to be reviewed and improved</p>	<p>October 2019</p> <p>Ongoing</p> <p>October 2019</p>	<p>Lynne Donovan</p> <p>Richard Harris</p> <p>Lynne Donovan</p>

Ref	Proposal for Improvement	Intended outcome/ benefit	High priority (yes/no)	Accepted (yes/no)	Management response	Completion date	Responsible officer
Page 94	and <ul style="list-style-type: none"> <li>requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the council which are underpinned by a contract or service level agreement.</li> </ul>				Work with Procurement and Commissioning Officers across all Council services to develop a system to ensure compliance which can then be monitored	December 2019	Liz Lucas
	2	<b>R4</b> Ensure all relevant staff, members and partners understand their safeguarding responsibilities by: <ul style="list-style-type: none"> <li>ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes;</li> <li>creating a corporate-</li> </ul>	Ensure that induction and ongoing training is provided to relevant staff, members, contractors and volunteers so that all can deliver their responsibilities in relation to Corporate Safeguarding of children.	Yes	Yes	Fully implement the Training Programme across the Council through DSO Group supported by Children's Services  ITrent to be adapted	December 2019 Review @ 6 & 12 months

Ref	Proposal for Improvement	Intended outcome/ benefit	High priority (yes/no)	Accepted (yes/no)	Management response	Completion date	Responsible officer
	<p>wide system to identify, track and monitor compliance on attending safeguarding training in all council departments, elected members, schools, governors and volunteers; and</p> <ul style="list-style-type: none"> <li>requiring relevant staff in partner organisations who are commissioned to work for the council in delivering services to children and young people to undertake safeguarding training.</li> </ul>				<p>to record all training using agreed drop down options. Retrospective training to be recorded</p> <p>Work with Procurement and Commissioning Officers across all Council services to develop a system to ensure compliance which can then be monitored</p>	<p>October 2019</p> <p>December 2019</p>	<p>Lynne Donovan</p> <p>Liz Lucas</p>
3	<b>R6</b> Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and	Provide a clear picture of the performance of the Council against its Corporate Safeguarding policy	Yes	Yes	Annual Corporate Safeguarding Report will be presented to Social Care & Well Being Scrutiny Committee and to	July 2019 and ongoing	Gareth Jenkins & Committee Services

Ref	Proposal for Improvement	Intended outcome/ benefit	High priority (yes/no)	Accepted (yes/no)	Management response	Completion date	Responsible officer
Page 96	<p>council-wide set of performance information covering:</p> <ul style="list-style-type: none"> <li>• benchmarking and comparisons with others;</li> <li>• conclusions of internal and external audit/inspection reviews;</li> <li>• service-based performance data;</li> <li>• key personnel data such as safeguarding training, and DBS recruitment checks; and</li> <li>• the performance of contractors and commissioned services on compliance with council safeguarding responsibilities</li> </ul>	and identify areas for further development.			<p>Audit Committee rather than being posted for information as it currently is.</p> <p>The Report will be posted for information on all other Scrutiny Committees and can be called in as appropriate.</p>		

Ref	Proposal for Improvement	Intended outcome/ benefit	High priority (yes/no)	Accepted (yes/no)	Management response	Completion date	Responsible officer
Page 97	<b>R7</b> Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.	Provides internal assurance as to the effective operation of the Corporate Safeguarding Policy.	Yes	Yes	Work with Internal Audit to review forward work programme and incorporate Corporate Safeguarding arrangements into audits going forward	September 2019 and ongoing	Richard Harris & Nicola Barrett
	<b>R8</b> Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council.	Ensure that Corporate Safeguarding risks are effectively considered at a service and corporate level to allow appropriate action to be taken to address the identified risks	Yes	Yes	On the basis of the Review findings, the risks will be included on the Social Services Risk Register and the Corporate Director for Social Services will progress inclusion on the Corporate Risk Register through CMT.	July 2019	Dave Street, CMT & Gareth Jenkins

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**APPENDIX 3**

WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
R3	Safer Recruitment policy to be ratified	<p>Policy to be agreed by HR Strategy Group, CMT and Cabinet</p> <p>All managers to be trained on safer recruitment policy – training package to be developed and implemented</p>	<p>HR</p> <p>HR</p>	<p>Draft Policy is due to be presented to Education Joint Consultative Committee (JCC) on the 25<sup>th</sup> of September 2019. This will be followed by presentation at Corporate JCC, followed by Scrutiny and Cabinet.</p> <p>Training will be developed and implemented once policy is ratified</p>
	<p>DBS checks for volunteers and contractors</p> <p>Contractors compliance with safeguarding policy and their awareness of the policy</p>	<p>Task and Finish Group to look at:</p> <ul style="list-style-type: none"> <li>• DBS checks for contractors</li> <li>• Safeguarding training for contractors</li> <li>• Contractors access to safeguarding policy</li> </ul> <p>Agree process of how this is to be monitored</p>	<p>Establishment of a Task and Finish Group to include Procurement / Commissioning/ HR/ Internal Audit/ Relevant DSO's</p>	<p>On going, membership and dates yet to be agreed, awaiting response from Liz Lucas and Lynne Donovan</p>

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WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
R4	Implement Training Framework	<p>Tiered approach to safeguarding training to be agreed by Board and written up in framework and disseminated via DSO for implementation across the LA.</p> <p>Tier 2 training package to be developed and agreed and delivered across service areas</p>	Training Task & Finish Group/ DSO's/ Managers/ Safeguarding Unit	<p>Draft Framework to be signed off by Corporate Safeguarding Board on the 16<sup>th</sup> of September , once agreed this will be disseminated via DSO's</p> <p>Tier 2 training package has been developed. There are 3 training sessions scheduled for the 8<sup>th</sup>, 9<sup>th</sup> and 21<sup>st</sup> of October to be delivered by Mike Portlock and Deb Lewis</p> <p>DOS' have been nominating staff from service areas to be trained to deliver Tier 2 training package- Understanding Safeguarding Children and adults ( half day), dates for Train the Trainer sessions are 24<sup>th</sup> and 30<sup>th</sup> of October. Those nominated will attend both days and then form part of a delivery group, support by Deb Lewis, Mike</p>



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WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
				Portlock and Rhiannon Thorn
	<p>Backdating of training already completed to be inputted on to ITrent</p> <p>Development of Tracking system for training for staff, volunteers and contractors</p>	<p>Individual services areas to input training to ITrent that has already been completed. Managers to collate this data and ensure permissions in ITrent to record the training</p> <p>ITrent to be developed to incorporate codes in line with Safeguarding Training framework</p>	<p>DSO's with support from HoS and CMT</p> <p>HR</p>	<p>Update regarding backdating of training into Itrent is required at next DSO Practice Development Group</p> <p>Codes have been agreed to record the trained under the Corporate Safeguarding Training Framework. HR are in the process of updating Itrent to support this. Meeting is being held on the 11<sup>th</sup> on September to assess progress</p>
	<p>Agree timescales for new starters, volunteers and contractors to undertake basic initial training</p>	<p>Ensure staff and volunteer induction processes include Corporate Safeguarding as a mandatory requirement</p> <p>Council tenders and contracts to make expectations on contractors explicit.</p>	<p>HR/ DSO's</p> <p>Procurement/ Commissioning/ Internal Audit</p>	<p>Corporate Safeguarding training Framework outlines that basic Safeguarding awareness is part of all inductions for staff and volunteers – Tier 1 training</p>

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WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
	Training update to be reported to Corporate Safeguarding Board to monitor compliance in each service area- staff, volunteers and contractors	Quarterly Reports to the Corporate Safeguarding Boards and inclusion in the Annual Report.	Gareth Jenkins/ Nicola Barrett	This matter will go forward once training framework has been signed off ad codes implement in Itrent
	Explore e learning packages	Current e learning packages available to be explored	Training Task & Finish Group/ DSO's/ Managers/ Safeguarding Unit	Caerphilly does currently have it packages to support the development of learning with the ability to track completion ( Learning management system( LMS)  Powerpoint presentation can be utilised along with knowledge test via snap survey ( this was used for Mandatory Data Protection eLearning). Further exploration of this is required.  RCT have an eLearning module but do have a LMS system to track completion.

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WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
				<p>Leisure services use an e learning package (IHASCO), however this has cost implications. 3000 credits is a cost of £4500</p> <p>WFD have software to develop a video presentation (with voice over) that can be utilised for Tier 1 training/refresher of Tier 1. This could also be used to send to commissioned services as part of the contracting process, with the expectation that providers complete and record that the training is completed and this could form part of internal audit process.</p>
R6	<p>Increase frequency of Board Meetings</p> <p>Timings of Board meetings to be reviewed to comply with Scrutiny and</p>	<p>Corporate Safeguarding Board to meet quarterly of next 12 months to monitor the implementation of the Action Plan and frequency will then be reviewed</p>	<p>Gareth Jenkins/ Nicola Barrett</p>	<p>Completed</p>

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WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
	Audit Committee deadlines			
	Annual Report to provide more robust assurance of safeguarding arrangements within the LA  Bench marking of arrangements with other LA's	Annual report to include performance data regarding training compliance across staff, volunteers and contractors Key data set to be updated to include a wider set of data cross service areas Comparison data with other LA's to be sought to inform Annual report		Key data set to include more detailed performance data was agreed at last Board meeting- need to be updated to Corporate safeguarding Policy.  Nicola Barrett to discuss with Gwent Counterparts comparison data to inform annual report at next safeguarding leads meeting on the 18 <sup>th</sup> of September
	Corporate Safeguarding to be included on the Risk Register	WAO Review Report and Action Plan to be included on Social Services Risk Register  CMT to consider inclusion on the Council Risk Register	Gareth Jenkins  Dave Street	Completed  Ongoing consideration by CMT
	Policy to be made available on front page of the intranet, to include access to	Corporate Safeguarding icon to be visible on front page Links to be made in Policy and Service Area Tabs	Liz Lucas/ Nicola Barrett	Meeting scheduled for the 5 <sup>th</sup> of September to discuss

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WAO Recommendation	Action	Actions/Requirements	Who	Progress/Completion
	Annual Report and list of DSO's			
R7	Role of Internal Audit	<p>Links with other LA's as to how they undertake internal audits for Corporate Safeguarding</p> <p>Develop mechanism of internal audits, focus of audits, frequency etc</p> <p>Corporate safeguarding policy to be updated to reflect internal audit responsibilities</p>	Internal Audit/ Nicola Barrett	<p>Meeting held with Richard Harris on the 1<sup>st</sup> of August, links made with other LA's (Newport and Monmouthshire) Richard Harris in process of developing internal audit tool. Awaiting update from Richard Harris on progress with this.</p> <p>Policy will be updated once intern audit process is confirmed</p>
	Internal Audit to receive Corporate Safeguarding training	Team training session to be arranged		Booked for the 25 <sup>th</sup> of September
R8	Self-assessment tool to be implemented	DSO's to return completed Self-Assessment Tool by the 15 <sup>th</sup> of July, with attached action plans to strengthen corporate safeguarding arrangements across service areas	DSO's	Self assessment tools have been returned, to be reviewed and discussed at the next DSO Practice Development group on 21 <sup>st</sup> of October

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