

# Gloucestershire Safeguarding Children Partnership



## Action Plan in Response to: Child X Local Child Safeguarding Practice Review

### A Multi-Agency Safeguarding Review undertaken by the GSCP 2023

The Gloucestershire Safeguarding Children Partnership reports on the effectiveness of multi-agency safeguarding arrangements as defined in its Published Arrangements and through undertaking serious safeguarding reviews or multi agency audits. The GSCP are required to draft a robust and timely action plan to address any recommendations. The action plan confirms whether recommendations are agreed, partly agreed, or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plan provides specific steps and actions to address these. Actions are clear, measurable, achievable, and relevant with the owner and timescale of each step clearly identified. Progress against the implementation and delivery of the action plans will be monitored by the GSCP Quality and Improvement in Practice Subgroup (QiiP) and reviewed annually by the GSCP Executive

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons

#	Recommendation		Agreed / Partly Agreed / Not Agreed	Response Action Taken/Planned	Responsible Owner	Target Date	Status
1	Undertake a comprehensive review of children's placement commissioning to:	1.1 Ensure regular and robust quality assurance in partnership with social care, education, and health to ensure that providers can meet the needs and desired outcomes identified in the child's care plan as well as providing good quality care and value for money,	Agreed	<p><b>Action Planned:</b> The authority to undertake a comprehensive review of children's commissioning, Led by the Interim Assistant Director Commissioning. The scope and methodology of the review to be signed off by the ICB Integrated Commissioning Lead and DCS and sighted with GSCP Independent Scrutineer who will also be a recipient of a full report and action plan</p> <p><b>Action Update:</b> The AD Integrated Commissioning has undertaken a functional review of the whole Hub inclusive of Placements. Improvements following include: Integration of CQAT team in Placements, introduction of ContrOcc to improve commissioning, designated staff portfolios. The refresh of CYPMARP, and maintenance of the daily directors' sign-off meetings add further decision-making oversight and QA of provision. We have also agreed through JCPE to undertake a review of strategic integrated commissioning to be undertaken by PeopleToo. An independent consultant (TL) has been employed to undertake a review of GCC contract management, the findings of which will be added to improvement planning.</p>	Interim Assistant Director Commissioning	March 2024	Partially

	1.2	Develop a framework of good practice to ensure that children’s safeguarding, care education and health needs are addressed when creating crisis care packages, that may be unregistered, for children with complex needs,	Agreed	<p><b>Action Planned:</b> Develop a clear set of safe standard operating procedures for the setting up, management and delivery when creating crisis care packages, that may be unregistered, when this option is required as a last resort. In parallel ensure clear guidance, staff training and partnership wide understanding of the arrangements is communicated across the partnership.</p> <p><b>Action Update:</b> Meeting between operations and commissioning has been set to draft the guidance and SOP as outlined above. PS RE</p>	GCC Children Social Care Director of Safeguarding and Care and Interim Assistant Director Commissioning	Dec 2024	
	1.3	Develop the commissioning team’s knowledge and understanding of children’s social care and the role of multi-agency partners,	Agreed	<p><b>Action Update:</b> The Heads of Quality and Placements are currently (Feb 2024) scheduling joint training of the Placements team to improve shared understanding of children’s social care and the roles of partners.</p>			
	1.4	Develop clear, auditable record keeping processes with decisions about children included on their individual electronic record,	Agreed	<p><b>Action Planned:</b> GCC Childrens Social Care and Childrens Commissioning to explore robust connectivity with Liquid Logic for all records to be linked appropriately.</p> <p><b>Action Update:</b> The AD Integrated Commissioning is leading the project to introduce Liquid Logic and ContrOcc to Placements commissioning which is attending to this item.</p>			
	1.5	Consider the role of the wider multi-disciplinary team in planning, commissioning, and quality assuring placements	Agreed	<p><b>Action Planned:</b> <i>As Action 1.2</i> this action will be included into standard operating procedures.</p> <p><b>Action Update:</b> AD Integrated Commissioning and ICB Deputy Director</p>			

				Integrated Commissioning to formalise joint decision-making process and resource to enable in-situ decision-making for complex needs children. Head of Placements (HoP) working with district housing colleagues so that planning applications include the HoP in this decision-making.			
2	The GSCP Executive should have knowledge and oversight of all children placed in unregulated and unregistered settings and ensure that there is good quality governance and accountability.	2.1 Across the Safeguarding Partnership governance and accountability should be strengthened so that it is clear who is responsible for day to day and longer-term planning and decision making for children in care	Agreed	<b>Action Planned:</b> The GSCP should be informed regularly on the number of bespoke unregistered placements in place for children under the care of the Local Authority. As part of this sharing of data the authority should give assurances that clear governance arrangements for all unregistered placements are in place. Links to action 1.2 and should form part of the standard operating procedures under Action 1.2.	GCC Children Social Care Director of Safeguarding and Care/ Interim Assistant Director Commissioning	April 2024	
		2.2 All multi agency meetings and panels need clear terms of reference, SMART actions, effective record keeping and regular review.	Agreed	<b>Action Planned: As action 1.2</b> this action will be addressed through clear 'Standard Operating Procedures' which should include ongoing quality assurance processes to be assured that the agreed procedures are applied in every case.  <b>Action update:</b> Unregistered/Unregulated panel: ToR in place. LL form under development to ensure that records are clear and accessible.  CYPMARP (Children and Young People's Multi-Agency Resource Panel) ToR, action tracker, record-keeping all in place – Complete.	GCC Children Social Care Director of Safeguarding and Care / Interim Assistant Director Commissioning	Dec 2024	Partially

				High-Cost, 16+, and Permanence panels: all have ToR in place, action trackers and record-keeping - Complete.			
3	Flexible and responsive therapeutic response to children in care with complex needs	3.1 Develop the CAMHS commissioning arrangements to enable a more flexible and responsive therapeutic response to children in care with complex needs and extreme behaviours that is underpinned by a trauma informed approach.	Partly Agreed	<p>The wider implications of this review will see the partnership collectively considering how children are provided a service in their time of need. <b>Action Planned:</b> To design and develop a local response providing a flexible service for children in care with complex need. This will include an analysis of need and coproduction work to develop support options that will include consideration of accommodation-based options.</p> <p><b>Actions underway</b> A project has begun to integrate the physical and mental health Child in Care Health Services based in Gloucestershire. Phase 1 (up to March 2024) has focussed on the alignment of the services and clarifying their governance structure. Phase 2 (from 1st April 2024) will review the service delivery across Child in Care Health Services and all CAMHS provision. This will then help to redefine with multiagency partners, the expected role and remit of the Gloucestershire Health and Care (GHC) NHS Foundation Trust services supporting children in care, going forward.</p> <p>Complex needs Board established, chaired by DCS. Progress continues to be made by multi-agency partners with respect to the complex</p>	GCC, ICB, Constabulary	2024	Partially

				<p>needs pathways (children in hospital, accommodation, prevention).</p> <p>Multi-agency review of child A undertaken with NHS Trusts, ICB, GCC – to inform refreshed MoU and working processes.</p> <p>A task and finish group has been running, led by the GCC Project Lead to develop a model of health support as part of the sufficiency strategy.</p>			
4	Children in unregistered placements must have their educational needs considered and met	4.1 The Virtual School should always be involved in planning placement moves and procedures to inform them (issuing a placement notification letter) must be followed.	Agreed	<p><b>Action Underway:</b> Clear guidance is being issued on responsibilities in this area to all Social Worker and IROs. In addition, the Virtual School Head has been included in unregistered panel meetings ensuring the educational needs of the child are being championed.</p>	GCC Children Social Care HoQ / Education Service –Virtual Head	Dec 2024	Partially
		4.2 All education transitions should be planned for and captured where possible and included as part of the Personal Education Plan. Any school (education) move should also have a school move protocol completed and the EHCP review should take place for those children who have a school move planned.	Agreed	<p><b>Action Underway:</b> All education transitions are planned for and where this doesn't occur the IRO service will capture the detail and follow up through the LA escalation process in all cases.</p>	GCC Children Social Care HoQ	Dec 2024	
5	Health and care planning in unregistered placements for children in care with complex needs	5.1 The children in care nursing service must be involved when a child is placed out of authority to support careful and consistent health and care planning particularly in times of transition. Depending on the needs of the child, CAMHS should also support at points of care transfer (either in or out of area), aiding information sharing, careful	Agreed	<p><b>Action Planned:</b> Links to action 1.2 and 3.1. The partnerships arrangements require robust escalation at all times where a child's needs dictate a robust partnership process to respond to placement breakdown. In addition, the Independent Scrutineer has reviewed and scrutinised the current escalation process aligned with the Executive</p>	Independent Scrutineer / GSCP Business Manager	March 2024	Complete

		planning, and the development of a shared approach to meeting children’s needs.		Strategic Escalation Log feeding back to the GSCP Executive on Exception			
6	Meeting children’s cultural, racial and identity needs	6.1 All agencies must develop a more robust and informed approach to assessing and meeting children’s cultural, race and identity needs in placement commissioning and care planning.	Agreed	<p><b>Action Underway:</b> Links to action 1.2 and the implementation of robust SOP arrangements as well as Links to Action 7.1. Systemic practice has been implemented across the authority and is being communicated and shared across the partnership. Childrens life story work has been implemented across the authority in response to previous LCSPR findings.</p> <p><b>Action Planned:</b> The authority will review its current Childrens Advocacy and Independent Visitor services to assure itself of the efficacy of the service taking into consideration the <a href="#">Department for Educations Revisions to National Childrens Advocacy Services.</a></p> <p>Understanding of Adultification and the impact on children to be rolled out through SWA Learning Lunches and Practice Briefings</p>	Interim Assistant Director Commissioning / GCC HoQ	March 2024	
		6.2 All agencies must ensure that there is an understanding of racism and bias that can lead to the adultification of some children where their vulnerability and support needs are not understood.	Agreed				
7	The GSCP Executive should understand and be assured of current Advocacy and Independent Visitor Services commissioned and their impact for children in care	7.1 Develop the role of independent advocate for children in care who do not have a trusted professional who knows them well. This will require a review of the current provision and its remit to assess its fitness for purpose including how the service is presented to the child as an option for support.	Agreed	<p><b>Action Underway:</b> Advocacy and Independent Visitor services have recently been commissioned in Gloucestershire. The GSCP Executive should seek assurances from either the Providers or Commissioning Service of the efficacy of these services. In addition, the service should provide data to the GSCP to allow effective monitoring of the impact of the services.</p>	Interim Assistant Director Commissioning / GSCP Business Manager	March 2024	Partially
8	Strengthen the role of the IRO:	8.1 Ensure all relevant agencies are involved in child in care reviews and as a matter of course, consult with children in care	Agreed	<p><b>Action Planned:</b> The GCC IRO Service to report back to the GSCP Executive via the Quality and Improvement in Practice</p>	GCC HoQ	April 2024	

		health teams and the virtual school as part of the review,		Subgroup on the IRO Service and its response to this review, paying particular attention to recommendation 8, offering assurances against 8.1 and 8.2 and 8.3 to include details of improvements and areas for additional activity with the use of data to evidence.				
		8.2 Review and monitor the use of external escalation processes in challenging IRO concerns about care plans						
		8.3 Always consult and involve parents in the review process						
9	Escalation of concerns	9.1 The Safeguarding Children Partnership should challenge agencies on how they respond to escalation of concerns about children and to what extent within each agency there is a culture of openness to healthy challenge amongst senior leaders.	Agreed	<p><b>Action Underway:</b> The Escalation process is well defined and easily understood. The Recent JTAI inspection (August 3<sup>rd</sup>, 2023) indicates that there is evidence that Escalation of Concerns can be seen to be working in Gloucestershire. The inception of an Executive Escalation Log ensures that high level scrutiny of partners is present within the GSCP Structure. The GSCP Business Unit with the Independent Scrutineer to consider what changes if any are needed from this review in relation to the Escalation Process and inform the Executive.</p> <p>GSCP S11 process to explore work across the partnership in relation to agencies promotion and support of staff in the use of their Whistle blowing policy.</p>	GSCP Business Manager / Independent Scrutineer	March 2024	Completed	
		9.2 Staff should be involved in reviewing and strengthening the Escalation of Professional Concerns Policy and the distinction between this and whistleblowing policies should be clear.	Agreed Partly					
		9.3 Professionals should be empowered to seek external scrutiny of concerns where they feel these have not been addressed by senior leaders.	Agreed					
10	GSCP Executive to be assured that considerations under the Working Together chapter on Adults in a Position of trust are being disseminated widely across the partnership	10.1 Raise awareness of the role of the LADO and ensure that all partners understand their role and responsibility in contacting the LADO when there are concerns that an adult who works with children may have caused them or could cause them harm through abuse or professional neglect.	Agreed	<p><b>Action Planned:</b> The GSCP to ask the Service to update on future activity and plans to fulfil the remit of 'raising awareness of the service'. The Independent Scrutineer to be asked to undertake a random Allegation Management Meeting audit to be assured of the services processes.</p> <p><b>Action Underway:</b> The Allegations Management Service has recently, reviewed its arrangements following the publication of Child C LCSPR in 2022. A full review was completed and reported to the GSCP. The</p>	GCC HoQ	March 2024	Partially	



				GSCP Business unit has produced a guide to employers on the successful management of allegations and has developed strengthened oversight and support of the Allegations Management Service to ensure that allegations that should be raised through the Executive Strategic Escalation process can be in a timely manner			
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Version	Date	Comment
1.0	23/08/2023	Initial Action Plan Drafted – GSCP Business Unit
2.0	29/09/2023	First Draft following planning meeting
3.0	13/10/2023	Final draft for scrutiny of the Management Group Chair and QiiP
4.0	26/10/2023	Final check pre–Executive Sign Off
5.0	31/10/2023	Proposed Change to Action 3 Action Planned -
6.0	06/12/2023	Publication – Postponed
7.0	19/02/2024	Updated
8.0	26/02/2024	Progress Update