

REPORT OF THE
GLOUCESTERSHIRE
SECTION 11 AUDIT

2022

Gloucestershire Safeguarding Children Partnership



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1. INTRODUCTION

Overview and Purpose

Section 11 of the Children Act 2004, places a duty on a range of organisations and agencies, to ensure that their functions are discharged in a way that safeguards and promotes the welfare of children. Each year the GSCP requires all relevant organisations to assess how they are meeting their statutory responsibilities and to provide assurance that they continue to comply with four key standards.

- Leadership and accountability.
- Staff safe recruitment, induction, and workforce development.
- Safeguarding policies and procedures.
- Listening to children and young people.

The 'Section 11 Audit' is an annual self-assessment process, with organisations providing the outcome of their analysis to an audit panel. This process is completed for two reasons:

- a) To update the safeguarding partnership as to how organisations are complying with their statutory responsibilities and to alert the executive to any issues of concern.
- b) To identify best practice and to support organisations to continually improve the way in which they promote the welfare of children and young people.

The audit does not seek to measure the effectiveness of partnership safeguarding activity or procedures, which are matters assessed through other measures. This report summarises the outcomes of the November 2022 audit.

Methodology

In 2022, a new methodology was agreed by the safeguarding partnership, involving a four stage process led by the independent scrutineer. It is intended that this will be fully implemented for the November 2023 audit, when each organisation will be asked to:

- a) Update on the outcome of recommendations from the previous annual audit.
- b) Provide an overview of any recent organisational inspection, including details of any recommendations that are relevant to how duties under the Children Act are discharged.
- c) Complete a written self-assessment as to compliance with the four key standards.
- d) Consider attendance at a question and answer audit panel, to examine how organisations seek and listen to the views of families, children, and young people. The panel will be led by young people¹ and facilitated by the independent scrutineer.

During a phased implementation of this process, the November 2022 audit was restricted to the submission of a written self-assessment and attendance at the question and answer panel.

Responses and Outcome

Written responses were received from all organisations asked to participate in the audit². All assessed themselves as complying with their statutory responsibilities, providing evidence as to how this had been achieved. Each organisation highlighted best practice that could be shared across the partnership and also outlined areas where future development would improve the services provided. The written submissions are held by the GSCP business unit.

¹ Supported by members of the Stroud District Youth Council.

² Full list attached at Appendix A.

A number of organisations also volunteered to meet with the audit panel, led by members³ of the Stroud District Youth Council (SDYC), to discuss how the views of families and young people may be effectively sought and considered. Both the SDYC and the GSCP are grateful to those who attended the panel session and for their valuable contributions.

About this Report

All organisations participating in the Section 11 Audit assessed themselves as complying with their statutory responsibilities and having analysed the information presented, the audit panel agreed with this assessment. During the audit good practice was identified, in addition to areas for improvement. The purpose of this report is therefore:

1. To inform the GSCP Executive that all agencies have met the minimum standards in relation to the duties imposed upon them by the Children Act.
2. To highlight examples of best practice to be considered by all organisations.
3. To highlight areas of concern which should be considered by the Executive.

The information contained within the report is purposely anonymised, with the detailed analysis and the evidence underpinning it held by the GSCP business unit.

2. ANALYSIS AND SUMMARY OF GOOD PRACTICE

A bullet point summary of good practice is provided below, framed within the four key standards. All organisations are invited to consider these examples and consider how they may be incorporated into their own procedures. Should anyone require further information, the GSCP business unit and the independent scrutineer would be pleased to help.

Standard 1: Leadership and Accountability

- Organisations and local councils⁴ (District and Borough) have an identified senior lead for safeguarding. At Senior Leadership Team meetings, safeguarding is a standing agenda item.
- Leaders and managers receive a higher level of safeguarding training, to ensure that policies are implemented effectively and staff are supported.
- Leadership teams widely promote an understanding of Adverse Childhood Experiences (ACE), supported by a staff training program to develop a child first culture.
- The introduction of a trauma informed culture to working with children and young people.
- Tewksbury Council working with the local housing partnership, to review and improve the housing offer to care leavers.
- Where external agencies are contracted to provide relevant goods and services, they must have systems in place to comply with safeguarding responsibilities. This must meet the standards of the commissioning organisation and providers must make references to this during the tendering process.

³ The members who kindly supported the audit are detailed at Appendix B.

⁴ Term 'local council' used within this report to describe the district and borough councils in Gloucestershire.

- Any voluntary sector group that receives a financial grant must comply with the commissioning organisation's safeguarding policies.

Standard 2: Staff Safe Recruitment, Induction, and Workforce Development

- Safeguarding training is included within the induction programme for all new staff, supported by guidance in a 'new starters' handbook. This includes specific training on the child neglect toolkit, modern day slavery, and domestic abuse.
- New staff are provided a mentor, who has an enhanced awareness of safeguarding.
- Level 2 safeguarding training is mandatory for all public facing staff.
- Staff within the human resources department have completed the safer recruitment training.
- Group supervision and training sessions are offered with the support of Microsoft Teams to enable staff attendance.
- A monthly safeguarding newsletter is distributed across the organisation, with themed safeguarding practice areas.
- Engagement with the multi-agency training offer, provided by the GSCP.

Standard 3: Safeguarding Policies and Procedures

- The development of new integrated safeguarding policies for people of all ages, to coordinate the safeguarding work of adults and children.
- Developing an understanding and preparing for the introduction of the Liberty Protection Safeguards (LPS). This will replace the Deprivation of Liberty Safeguards (DOLS) and will apply to young people from 16yrs of age.
- The GCSP escalation policy (resolving professional differences) has been circulated to all staff, with guidance in its use.

Standard 4: Listening to Children and Young People

- The SDYC has proven to be an excellent way of engaging with young people and ensuring that Stroud District Council has a child and young person focus. As described by the council representative attending the Q&A panel - "Everything that we do involves young people, they are statutory partners". The work of the SDYC has been recognised nationally as best practice, receiving an award from the British Youth Council in 2020.
- Organisations using the Hear by Right Standards⁵, to develop best practice for youth participation. This supports organisations to plan, develop, and evaluate their practices and provision.
- Use of the Gloucestershire Young Ambassadors to support the development of new working practices and to help ensure that services and provisions consider the needs of children and young people.
- Use of the Gloucestershire Young Ambassadors to mentor senior leaders and to encourage their involvement in the development of new initiatives.

⁵ <https://www.stroud.gov.uk/media/1605103/item-5-appendix-d-hear-by-right-introduction-nya.pdf>

- Using children, young people, and families in the development of services and to participate in quality audits to improve current practice.
- Cheltenham Borough Council's use of the No Child Left Behind Campaign⁶, a programme that seeks to break down the barriers that poverty creates to an equal access to education.
- Cheltenham Borough Council's partnership with the University of Gloucestershire for an evidenced based approach to solving problems that affect young people. For example, the rise in eating disorders; and young person satisfaction rates with their schools.
- Cheltenham Borough Council's partnership with schools, to seek the views of young people whilst designing new services. An excellent initiative that includes the provision of resources to schools enabling this engagement, elected members going into schools, and inviting young people to present their findings at council meetings.
- Local councils ensuring that providers conduct effective consultation for the services they are commissioned to provide. This includes a requirement that findings from consultations are shared with the local councils.

<i>Recommendation 1:</i>	<i>Each organisation should consider the best practice outlined within this report and consider how it may be used to further improve their services. A summary of action taken and its impact will be requested during the 2023 Section 11 Audit.</i>
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3. AREAS OF CONCERN AND FOR DEVELOPMENT

The audit identified three issues that should be considered by the safeguarding partnership.

- A. Local councils – In particular a widely held view that they do not provide services to children or young people and therefore do not have a requirement to engage with them to identify and consider needs.
- B. Gloucestershire Constabulary – The findings of the 2021-2022 PEEL Inspection, a matter that the partnership is aware of and that the constabulary is actively addressing. This requires monitoring and where necessary supportive challenge from partners.
- C. Gloucestershire County Council's compliance outside of Childrens Social Care (CSC). Currently the authority is visible and compliant if measured against CSC. The author cannot comment on the rest of the authority's departments with a duty under S11 of the children Act.

A) Local Councils (District and Borough Councils)

Whilst the audit panel found some excellent examples of how local councils are able to engage with children and young people, this was not consistent across Gloucestershire. Out of the six local councils, only two had a culture of considering the needs of children and young people.

The other four local councils articulated a view that they only provided services to adults and did not have a requirement to engage with children and young people. To their credit, two of these councils accepted that they needed to do more and would like to learn from the best practice developed in other areas. The remaining two councils declined to accept that they had any responsibility to children

⁶ <https://nochildleftbehind.org.uk/about>

or young people. This view was in contrast to the two districts who saw young people as statutory partners and it is a view that caused the audit panel concern.

It is recommended that the GSP and local councils develop a vision as to how the needs and views of children and young people should be considered. Once this vision has been agreed, then the GSCP Districts Sub-group would be an excellent forum to share best practice and support councils to improve the efficacy of services provided to children and young people.

<i>Recommendation 2:</i>	<i>It is recommended that the GSCP and the district and borough councils develop a vision as to how the needs and views of children and young people should be consistently considered within the County.</i>
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B) Gloucestershire Constabulary

The HMICFRS 2021-2022 PEEL Inspection considered the effectiveness, efficiency, and legitimacy of the Constabulary. The inspection report outlined a number of findings that may impact the constabulary's ability to protect children and manage dangerous offenders.

The GSCP is fully sighted on these issues and the Constabulary has an improvement plan in place. It is recommended that the GSCP keeps track on the progress of this improvement plan and how this delivers positive outcomes for children and young people.

<i>Recommendation 3:</i>	<i>The GSCP should track progress of the constabulary's response to the 2021-2022 HMICFRS PEEL Inspection and where appropriate provide supportive challenge.</i>
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C) Gloucestershire County Council

GCC compliance with S11 resides primarily with GCC Children Social Care and Commissioning. Where GCC engage with the S11 process there is clear evidence of compliance, as would be expected. However, Working Together 2018 and the Children Act 2004 under section 11 names the authority as a whole as a safeguarding partner.

GCC Adult Social Care do submit a S11 report, but as with some of the districts they too have commented that they do not work with children. Their engagement, whilst welcome, would benefit from engaging with the Independent Scrutineer (I.S.) and attending the Panel Day to develop a broader recognition of their Children Act 2004 S11 duties.

However, the totality of GCC is not represented and is not visible to the GSCP through the S11 process. Any part of the authority that comes into contact with children, and or adults responsible for children, are required to consider their safeguarding duties starting with S11 of the Children Act 2004. The Education Department, Libraries and Registration Service, and Integrated Transport etc. are not visible through this process at all. There would be benefit in including all GCC departments in this process.

<i>Recommendation 4:</i>	<i>The GSCP should seek assurances that GCC as a whole is included in future S11 submissions and ask the Authority to work with the GSCP Business Unit and Independent Scrutineer to determine how this can be addressed in 2023.</i>
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4. CONCLUSION AND SUMMARY OF RECOMMENDATIONS

Concluding Comments

The audit panel would like to thank all organisations for their engagement with the audit process and for the information provided. I would particularly like to thank those who gave their valuable time to meet with the audit panel led by the Stroud Youth Council. During the audit a great deal of best practice was identified and I look forward to seeing how organisations use this learning to continually improve services provided to children, young people, and their families.

Preparation for the 2023 Audit

During the 2023 Section 11 audit, organisations will be asked to provide specific information as outlined earlier in this report. To support preparation for that audit it would be helpful for the safeguarding partnership to complete the following as soon as possible:

- a) Write to all organisations informing them of the 2023 process and the timetable. Including the need to provide details of recent organisational inspections and a written self-assessment.
- b) Produce and distribute the question set for the 2023 written assessment, so that organisations can consider the safeguarding standards during organisational planning. It is recommended that the current four key standards are retained, with a specific question asking what organisational improvement has taken place and how the best practice outlined in this report has been considered. This will help to show impact of the section 11 audit process.
- c) Agree a date for the Section 11 Panel to meet organisations and encourage participation with the panel led by young people.

Summary of Recommendations

<i>Recommendation 1:</i>	<i>Each organisation should consider the best practice outlined within this report and consider how it may be used to further improve their services. A summary of action taken and its impact will be requested during the 2023 Section 11 Audit.</i>
<i>Recommendation 2:</i>	<i>It is recommended that the GSCP and the district and borough councils develop a vision as to how the needs and views of children and young people should be consistently considered within the County.</i>
<i>Recommendation 3:</i>	<i>The GSCP should track progress of the constabulary's response to the 2021-2022 HMICFRS PEEL Inspection and where appropriate provide supportive challenge.</i>
<i>Recommendation 4:</i>	<i>The GSCP should seek assurances that GCC as a whole is included in future S11 submissions and ask the Authority to work with the GSCP Business Unit and Independent Scrutineer to determine how this can be addressed in 2023.</i>

APPENDIX A – PARTICIPATING ORGANISATIONS

<u>Agency</u>	<u>Comment</u>
Children and Family Court Advisory and Support Service (CAFCAS)	Provided a National Response
Cheltenham Borough Council	
Cotswold and Forest of Dean District Councils	Presented by the Publica Group ⁷
Gloucester City Council	
Gloucestershire Children's Social Care	
Gloucestershire Constabulary	
Gloucestershire County Council Adult Social Care	Did not attend the Panel Day
Gloucestershire County Council Commissioning.	
Gloucestershire Health and Care NHS Foundation Trust	
Gloucestershire Hospitals NHS Foundation Trust	
Gloucestershire Integrated Care Board	
Gloucestershire Youth Support Team	
Probation Service	Provided a National Response
Stroud District Council	
Tewkesbury Borough Council	

APPENDIX B – STROUD DISTRICT YOUTH COUNCIL MEMBERS

Cate James-Hodges	Member of SDYC
Alyssa Pearce	Member of SDYC
Megan Land	Member of SDYC
Brandon Watkins	Member of SDYC
Steve Miles	Supporting the SDYC Members

⁷ Publica is a not-for-profit Teckal company owned by Cotswold, Forest of Dean, and West Oxfordshire District Councils and Cheltenham Borough Council. The four shareholder councils share skills and resources, to improve the delivery of services to local communities, residents and businesses.