

Gloucestershire Safeguarding Children Partnership



Section 11 Audit 2024-2025

Independent Scrutineer and Audit Panel Report

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1. INTRODUCTION

1.1 Overview and Purpose

Section 11 of the Children Act 2004 places a duty on a range of agencies and organisations¹, to ensure that their functions are discharged in a way that safeguards and promotes the welfare of children. Each year the Gloucestershire Safeguarding Children Partnership (GSCP) requires all relevant agencies 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.
- Understanding & communicating with and for children.

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

- a) To update the safeguarding partnership on how agencies are complying with their statutory responsibilities and to alert the executive to any issues of concern.
- b) To identify best practice and to support agencies 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.

1.2 Methodology

- Each agency completed an online questionnaire to assess its compliance with Section 11 standards and provide commentary on relevant activities. The responses were insightful, helping to identify best practices that can be shared across the partnership. Additionally, the questionnaire invited agencies to reflect on last year's audit, highlighting how they have incorporated identified best practices to enhance their services. British Transport Police and the South West Ambulance Service provided a written response, reflecting their national and regional responsibilities; all written submissions are held by the GSCP business unit.
- Agencies were invited to participate in a half-day workshop² facilitated by an audit panel comprising the Stroud Youth Council, Gloucestershire Ambassadors for Vulnerable Children and Young People, and the Independent Scrutineer. The event was well attended and received positive feedback from participants.
- The audit panel conducted an analysis of information gathered from written submissions and the workshop. The findings from this analysis were used to prepare this audit overview report.

1.3 Audit Themes

Each year the Section 11 audit has a strong focus upon how children and young people are engaged and listened to. Additionally, the 2024-2025 audit, focussed upon Allegations Management and how agencies worked with the Office of the Local Authority Designated Officer (LADO) to make referrals and conduct investigations.

¹ The term agency is used to describe those government bodies within the safeguarding partnership, including District Councils. Organisation is used to refer to other bodies – including private and voluntary.

² Details of the audit panel, workshop attendees, and the workshop agenda appears at Appendix A.

2. STATEMENT OF ASSURANCE

2.1 Assurance Statement

All agencies 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. The audit is therefore able to confirm to the GSCP Executive that all agencies have met the minimum standards in relation to the duties imposed upon them by the Children Act.

During the 2023-2024 audit, seven key recommendations were made, and I am pleased to report that this year's audit provides substantial evidence of how agencies have considered and addressed these recommendations. One key recommendation was ensuring that agencies verify compliance with Section 11 standards among commissioned service providers and funded organisations. This audit has demonstrated a strong commitment to this principle, with clear evidence of how it is being implemented.

Overall, this year's audit findings highlight the positive impact of the GSCP Section 11 process, reinforcing its effectiveness in supporting meaningful improvements.

2.2 About this Report

The audit identified a substantial amount of good practice, demonstrating how agencies have successfully incorporated best practices from last year's audit whilst also developing new approaches to enhance safeguarding and service delivery. This report provides a summary of these findings and encourages each agency within the partnership to reflect upon them and explore opportunities for further improvement.

This report serves three key purposes:

- To formally inform the GSCP Executive that each agency has met the minimum standards required under the Children Act.
- To highlight examples of best practice that all agencies may consider adopting.
- To identify areas of concern for review by the safeguarding executive and relevant agencies.

The information contained within this report is on the whole anonymised, with detailed analysis and supporting evidence held by the GSCP Business Unit.

3. UPDATE UPON THE 2023-2024 AUDIT RECOMMENDATIONS

3.1 Recommendations From 2023-2024 – Summary of Compliance

- Recommendations: 1, 5, & 7: It was identified that the Office of the Police and Crime Commissioner (OPCC), broader elements of Gloucestershire County Council (outside of children's services), and Adult Social Care had not been appropriately involved in previous Section 11 audits. In this year's audit, each agency actively contributed, with both the OPCC and Gloucestershire County Council represented at the workshop session, ensuring broader engagement and collaboration.
- Recommendation 2: It was recommended that the National Youth Agency 'Hear By Right' standards were specifically included within this year's process. This was done and there was clear evidence that agencies now understand the principles and are considering them in service provision.

- ***Recommendation 3:*** All agencies were encouraged to review and incorporate best practices from the 2023-2024 audit. To support this, a dedicated section was included within the written submission portal. This report provides substantial evidence that agencies have acted on this recommendation, detailing the outcomes of their efforts.
- ***Recommendation 4&5:*** These related to the commissioning of services and funded organisations. Developments are summarised in the next section of this report.

3.2 Commissioned Services and Funded Organisations

In 2023, concerns were raised as to how commissioning bodies ensure that organisations commissioned to provide services comply with both the statutory responsibilities and the underlying principles of Section 11 of the Children Act. The Section 11 audit addressed these concerns by making recommendations and expanding its scope to include funded organisations (*Recommendations 4 & 5*). A summary of best practice developed by commissioning agencies in response to this is presented as follows:

i) Training and Support for Commissioners

- A gap in the knowledge of commissioners was identified in relation to safeguarding. To address this, the partnership has collaborated to develop specific training for commissioners, which will be delivered by the GSCP Business Unit Practice Development Team. The training will cover Section 11 responsibilities and Allegations Management issues.

ii) Strengthening Safeguarding in Commissioned Services

- Conducting a comprehensive review of formal commissioning arrangements to ensure that any organisation providing services or receiving funding has safeguarding measures that meet the standards of the Children's Act and the commissioning agency. This includes appointing a Designated Safeguarding Lead, adhering to GSCP policies, and cooperating with safeguarding reviews and audits.
- Embedding safeguarding responsibilities within contracts and implementing an audit of existing contracts to reinforce safeguarding arrangements.
- Establishing a scrutiny regime to assess safeguarding incidents within commissioned services, ensuring an appropriate response and identifying lessons for ongoing improvement of standards.

iii) Child Centred Approach

- Ensuring that organisations providing commissioned services have clear policies on children's rights, incorporating the 'Hear by Right' standards.
- Embedding a child-focused perspective in the tendering process by requiring an overview that maps the child's journey through the service, along with the methods used to capture their voice and inform service development.

4. ANALYSIS AND SUMMARY OF GOOD PRACTICE

The written submissions and audit panel day highlighted a wealth of good practice across the partnership, alongside key areas for focus over the next 12 months. The bullet-point list below structures these insights within the key standards, providing agencies with an opportunity to reflect on successful initiatives and explore how innovative approaches can be integrated into their own procedures. For further details or support, the GSCP Business Unit and the Independent Scrutineer are available to assist.

Standard 1: Leadership and Accountability

- Safeguarding is reinforced with a designated senior leadership team appointment for safeguarding and its integration as a standing agenda item in leadership meetings to maintain its priority.
- Designated Safeguarding Leads should hold sufficient seniority to influence meaningful change within agencies and organisations to be able to drive transformational outcomes.
- The formation of corporate safeguarding groups, such as safeguarding champions meetings and scrutiny panels, helps to evaluate standards and uphold accountability. These are most effective when they report into executive or senior leadership team meetings, and when incorporated into performance dashboards – allowing for proactive risk identification and prevention.
- Named safeguarding leads receive Level Three training and are supported by strong professional development opportunities, including local and national CPD initiatives and GSCP safeguarding training programmes.
- Provider compliance with Section 11 responsibilities is monitored through contract oversight and performance meetings, whilst due diligence checks in commissioning arrangements ensure safeguarding standards are upheld.
- Safeguarding reviews are integrated into the Learning Assurance Team to evidence practice improvements.
- An annual audit programme is in place to ensure compliance with policies and procedures, including targeted audits that examine specific safeguarding themes.
- An important view from the workshop, was that safeguarding responsibility must be embedded across an entire organisation rather than being confined to the safeguarding team. A collective approach ensures that safeguarding considerations are integrated into all aspects of operations, fostering a culture of accountability and proactive risk management.

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

- All job descriptions explicitly outline employees' safeguarding responsibilities, embedding a clear commitment to safeguarding within every role. This is reinforced within induction programmes, featuring director-led presentations, and mandatory refresher training every two years.
- All new staff in public-facing roles complete a day's safeguarding training as part of their induction, including five hours of face-to-face training.
- Volunteers and casual staff receive bespoke face-to-face safeguarding training at Levels 1 and 2.
- All dispatchers and control operators within the South West Ambulance Service operations centre receive mandatory Level 2 safeguarding training.
- Recruiting managers are required to complete both childrens and adult safeguarding training.
- Staff involved in the commissioning of services, should receive a higher level of safeguarding training and once developed, complete the new GSCP training programme for commissioners.
- Safeguarding is promoted through a dedicated Microsoft Teams Channel, ensuring staff receive key messages and initiatives.
- A pre-recorded webinar provides staff with essential safeguarding support and guidance on issues such as information sharing and referrals. Recognised good practice within teams is acknowledged and rewarded.

- A staff questionnaire assesses confidence and effectiveness in safeguarding practices, serving as a valuable training needs analysis.
- A new supervision model has been developed by one agency, offering a structured menu of options tailored to specific roles, along with a weekly supervision clinic for ongoing support.

Standard 3: Safeguarding Policies and Procedures

- Establishing a strategic Quality and Performance Committee to audit safeguarding arrangements and to develop a 12-month work plan aimed at improving safeguarding quality. The committee meets regularly to review exception reports and drive continuous improvements.
- Reviewing current procedures to ensure that the Human Resource (HR) departments understand their role when safeguarding incidents occur and establishing a clear link between HR processes and safeguarding teams, for effective coordination.
- A safeguarding referral register has been established and undergoes regular review to enhance referral monitoring, identify learning opportunities, and assess training needs.
- Process mapping work has begun to enhance the internal reporting process for safeguarding incidents, including the implementation of the Liberty portal-based management system to improve efficiency and accuracy in reporting and managing safeguarding incidents.
- The GSCP Escalation Policy is specifically referenced and incorporated within safeguarding policies and staff supervision sessions.
- The new OPCC Police and Crime Plan will explicitly reference safeguarding expectations for service providers and grant recipients.

Standard 4: Listening to Children and Young People

- The St Giles Trust³ conducted a youth survey in Cheltenham during the summer of 2024, aimed at informing a year of youth action and shaping future services. The report and survey methodology can be shared upon request.
- A review with young women in Cheltenham has been completed to assess their experiences and risks of exploitation. The findings will be summarised in a report to support multi-agency initiatives across the district council area in addressing concerns. The research principles may also be applied to children at risk of exploitation, and the report is available upon request.
- The Stroud District Youth Council remains actively involved within the district council, influencing work programmes and service delivery. This includes attendance at committee performance management meetings and a review of annual work programmes, to provide comment upon current work programmes and service delivery.
- The Gloucestershire Ambassadors for Vulnerable Children and Young People continue to support the local authority and other agencies in recruitment, training, and mentoring, whilst also contributing to the development of future policy and guidance. They are actively involved in the Children's Services Ambitions Board and will chair where possible.
- In the Forest of Dean and Cotswold districts, a domestic abuse network has been developed to engage children and young people in raising awareness of domestic abuse and available support services. This includes joint initiatives within schools and educational establishments to promote understanding and access to resources.

³ <https://www.stgilestrust.org.uk/>

- A significant number of multi-agency initiatives are in place across the county, engaging children of all ages in school-based and community-based programmes that address key issues such as road safety, risks of exploitation, drug awareness, violence against girls, and community safety.
- The employment of full-time, dedicated roles focused on inclusion and engagement with children, ensuring direct interaction to capture their voices and influence service development.
- All District Councils, and other agencies, collaborating within a multi-agency group to enhance the housing offer for care leavers across the county, actively supporting the Gloucestershire Corporate Parenting Programme.

Specific Audit Theme: Allegations Management and LADO

- Seeking support from the Office of the LADO to review processes and procedures, with the intention of enhancing the response to allegations and to develop processes for regular oversight. This collaborative approach has helped to improve consistency and to improve staff awareness.
- Several agencies have initiated regular review meetings with the Office of the LADO to examine cases, assess organisational responses to incidents, and track the progress of investigations.
- Encouraging the LADO to deliver awareness presentations to staff, improving awareness of allegations management and fostering continuous improvement. This is a valuable service offered by the LADO, which is available to provide further presentations as needed.
- Integrating LADO considerations into the commissioning process for funded organisations and service providers. New contracts include a requirement for relevant organisations to inform the commissioning body of any allegations, enabling audits for compliance.
- Agencies participating within the 2025 GSCP Process Review project, which examined the role of HR departments and patient safety departments within allegations management and issues of professional concern.
- Agencies participated in the 2025 GSCP Process Review project, which examined the role of HR and patient safety departments in allegations management and where other professional concerns arise. This review aimed to enhance procedural clarity, strengthen oversight mechanisms, and improve inter-agency collaboration in handling safeguarding matters.

Recommendation 1:	<i>Each organisation should consider the best practice outlined within this report and consider how it may be used to further improve services. Examples as to how this best practice has been used will be asked for in next year's audit.</i>
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5. AREAS OF CONCERN AND FOR DEVELOPMENT

The workshop attendees highlighted several key issues that may require attention within the partnership over the next 12 months. These concerns have been summarised below to guide future discussions and strategic focus. If further clarification or deeper analysis is needed, the independent scrutineer is available to provide additional insights in future presentations.

5.1 Local Government Restructures

Any local government restructuring in Gloucestershire will inevitably impact upon the GSCP's structures and the broader safeguarding arrangements within the county. As discussions progress, it will be essential to assess how these changes impact the safeguarding children partnership and its membership, ensuring continuity and effectiveness.

A key consideration in this change programme should be the role of youth councils, particularly in maintaining their influence and engagement with young people. The Stroud District Youth Council has consistently delivered valuable support to children in Stroud whilst offering crucial guidance to the GSCP over the years. Preserving and strengthening such youth-led contributions within evolving governance frameworks will be vital for sustained safeguarding efforts.

<i>Recommendation 2:</i>	<i>Any local government restructuring in Gloucestershire should carefully assess its impact on the safeguarding children partnership and its membership to ensure continuity and effectiveness. A key consideration is the preservation and strengthening of youth-led contributions, such as those from the Stroud District Youth Council (SDYC), within evolving governance frameworks.</i>
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5.2 Engagement With Children

The audit revealed that agencies are uncertain about how to effectively engage with children, a concern echoed by many workshop attendees. Whilst all agencies express a strong desire to involve young people, there is a notable gap in knowledge regarding best practices for meaningful engagement. Although last year's audit recommended the establishment of District Youth Councils across Gloucestershire as a potential solution, the anticipated local government restructuring makes this unlikely. Whilst there are examples of good practice in relation to youth engagement within this report, what remains clear is that agencies require targeted support to bridge this gap and facilitate effective engagement with children.

<i>Recommendation 3:</i>	<i>The Safeguarding Children Partnership should explore ways to help agencies create networks that strengthen direct engagement with children. This will improve how children's views are gathered and considered in shaping better services.</i>
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5.3 Commissioning of Services and Funded Organisations

Significant progress has been made over the past 12 months in incorporating safeguarding considerations into the commissioning of services and the awarding of grants to organisations. However, there is still substantial work required in this area. An audit has revealed that many commissioned service providers are not fully complying with Section 11 standards, particularly in relation to essential policies such as safer recruitment and the appointment of designated safeguarding leads. To address this, a consistent approach to commissioning is necessary, including auditing existing contracts and upskilling staff involved in commissioning processes. Participation in the GSCP training, once developed, will be key to strengthening safeguarding practices across commissioned services.

<i>Recommendation 4:</i>	<i>A consistent approach to commissioning services is essential. It is recommended that commissioning bodies consider the best practices outlined in this report and once fully developed widely adopt the GSCP training offer for commissioners to strengthen safeguarding practices.</i>
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5.4 Change and Coordination

There are currently several ongoing or planned changes across the partnership, and there is a clear need to ensure that any change is fully considered within, and communicated across, the partnership. Workshop attendees emphasised the need to develop structured pathways that support staff within the partnership and across their agencies, enabling them to understand and effectively work within new procedures. Establishing these pathways will be essential to maintaining consistency and ensuring that all staff are equipped to navigate evolving processes.

Recommendation 5:	<i>Through the appropriate sub-group, the safeguarding children partnership should ensure that any changes impacting the multi-agency response to children and families are thoroughly considered and effectively communicated across the partnership. This process should incorporate communication strategies, structured pathways to support professionals, targeted training and resource provision, and an evaluation framework to assess the impact of these changes.</i>
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5.5 Transition From Children's Services to Adult Services

An increasing number of adult safeguarding reviews involve young adults who experienced vulnerabilities as children. It is widely acknowledged that multi-agency collaboration is essential to support children as they transition into adulthood, and ongoing work within the partnership aims to strengthen this support. Whilst no specific recommendation is needed, the audit panel would like to emphasise the need for a continued collaboration between the GSCP and the Adult Safeguarding Board to enhance the transition from children's services to adult services.

6. CONCLUSION AND SUMMARY OF RECOMMENDATIONS

6.1 Concluding Comments

The audit panel would like to thank each organisation for its contribution to the audit process and for the information provided. I would particularly like to thank those who gave their valuable time to participate in the workshop led by the Stroud District Youth Council and the Gloucestershire Ambassadors for Vulnerable Children and Young People. During the audit a great deal of best practice was identified and I look forward to seeing how agencies use this learning to continually improve the way in which services are provided to children, young people, and their families.

I would especially like to thank all of the young people for their role in leading the audit workshop and the professional way in which they undertook this role. The GSCP Executive joins me in this gratitude.

6.2 Action Now Required

Agency Responsibility: The first recommendation is an action for all agencies to review and implement identified best practices. Progress will be assessed in next year's audit.

GSCP Recommendations: The remaining four recommendations are directed to the GSCP. These should be reviewed by the executive, and where accepted, progressed accordingly to ensure effective implementation.

6.3 Preparation For Next Year's Audit

The young people involved in this year's audit described it as a very positive experience, covering a wide range of important topics and proving more effective than previous methods. This sentiment

was echoed by workshop attendees, who valued the opportunity to connect with colleagues and dedicate time to discussing key issues. General feedback on the format was overwhelmingly positive, with a recommendation to allocate more time in future sessions. In response, the 2025-2026 audit will take place in February 2026, with a full day dedicated to the process to enhance engagement and discussion.

6.4 Summary of Recommendations

Recommendation 1:	Each organisation should consider the best practice outlined within this report and consider how it may be used to further improve services. Examples as to how this best practice has been used will be asked for in next year's audit.
Recommendation 2:	Any local government restructuring in Gloucestershire should carefully assess its impact on the safeguarding children partnership and its membership to ensure continuity and effectiveness. A key consideration is the preservation and strengthening of youth-led contributions, such as those from the Stroud District Youth Council (SDYC), within evolving governance frameworks.
Recommendation 3:	The Safeguarding Children Partnership should explore ways to help agencies create networks that strengthen direct engagement with children. This will improve how children's views are gathered and considered in shaping better services.
Recommendation 4:	A consistent approach to commissioning services is essential. It is recommended that commissioning bodies consider the best practices outlined in this report and once fully developed widely adopt the GSCP training offer for commissioners to strengthen safeguarding practices.
Recommendation 5:	Through the appropriate sub-group, the safeguarding children partnership should ensure that any changes impacting the multi-agency response to children and families are thoroughly considered and effectively communicated across the partnership. This process should incorporate communication strategies, structured pathways to support professionals, targeted training and resource provision, and an evaluation framework to assess the impact of these changes.

APPENDIX A – THE PANEL AND PARTICIPATING AGENCIES

<u>Panel Member</u>	<u>Representing</u>
Hawabibi Bham	Gloucestershire Ambassadors for Vulnerable Children and Young People
Alyssa Pearce	Stroud District Youth Council
Leo Gough	Stroud District Youth Council
Mark Power	GSCP – Independent Scrutineer

<u>Participating Agencies</u>	<u>Comment</u>
Cheltenham Borough District Council	Written submission and Workshop
Cotswold and Forest of Dean District Councils	Written submission and Workshop
Gloucester City Council	Written submission and Workshop
Stroud District Council	Written submission and Workshop
Tewkesbury Borough Council	Written submission and Workshop
GCC Adult Social Care	Written submission
GCC Children's Services	Written submission and Workshop
GCC Commissioning	Written submission and Workshop
GCC Education Directorate	Written submission and Workshop
GCC Youth Support Team	Written submission and Workshop
Gloucestershire Health and Care NHS Foundation Trust	Written submission and Workshop
Gloucestershire Hospitals NHS Foundation Trust	Written submission and Workshop
Gloucestershire Integrated Care Board	Written submission and Workshop
Gloucestershire Constabulary	Written submission and Workshop
Office of the Police and Crime Commissioner	Written submission and Workshop
British Transport Police	Written submission
South West Ambulance Service	Written submission