

GLOUCESTERSHIRE SAFEGUARDING CHILDREN PARTNERSHIP SECTION 11 AUDIT.

Section 11 of the Children Act 2004 Places duties on a range of organisations, agencies, and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. (WT2018 p.g.58)

2021

Gloucestershire Safeguarding Children Partnership



Report of the Gloucestershire Section 11 Audit 2021.

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1. Introduction.

1.1 In December 2019 the Gloucestershire Safeguarding Children Executive (GSCP) approved its [S11 audit process](#). This annual process was agreed by the key agencies linked into the Gloucestershire Safeguarding Partnership with the exception of schools whose compliance with safeguarding is monitored through the S175 audit process.

1.2 The first S11 report was published in March 2021 and lessons learned from the first application of the new S11 procedure were built into the 2021 process.

1.3 The themed audit is designed to check compliance with the four S11 standards previously agreed by the partnership and chosen due to the overlap with key recommendations arising from Serious Case Reviews (SCR), Rapid Reviews and Local Children’s Safeguarding Practice Reviews.

1.4 The Four S11 Standards

1	2	3	4
Leadership and accountability	Staff safe recruitment, induction, training and development	Safeguarding policies and procedures	Listening to children and young people

2. Panel Members

2.1 Members of the panel are set out below. A major change this year was to invite representatives from the Stroud District Youth Council to observe the panel and make any recommendations on content and process. This was in response to last year’s recommendation that we should improve the ‘voice of children and young people’ in the S11 process

- **Kevin Crompton**
- Independent Scrutineer (IS) Chair of the S11 Panel
- **Andy Dempsey**
- Director of Partnerships & Strategy, GCC and Chair of the GSCP Management Group
- **Caroline Eardley**
- GSCP Lay Member
- **Isobel Dougan**
- Practice Development Manager, GSCP Business Unit

Stroud District Youth Council

- Cate James-Hodges
- Megan Land
- Morgan Smith
- Brandon Watkins
- Maxie Wells

Support

- Steve Miles (Stroud District Council)

Business Unit Support

- Dave Jones Business Manager
- Jackie Barnes Senior Administrator taking meeting notes

3. Method

3.1 Due to Covid 19 restrictions the panel met 'virtually', and the technology was robust and enabled good dialogue between the panel and the agencies. This was a major improvement on 2020.

3.2 Agencies were invited to prepare a written submission outlining how their agency was performing in these areas with evidence of how the standards had been met. A common reporting template was adopted this year (-a recommendation of the 2020 report.) This improved methodology gave the panel a much clearer view of agencies performance and enabled better comparison between agencies.

3.3 Timelines were also revised, and this gave the panel more time to consider submissions and to provide agencies with their analysis and further questions prior to the panel (- also a recommendation of the 2020 review). Panel members identified some specific questions for each agency in addition to the general questions set out above.

3.4 The panel agreed that all agencies would be asked five common questions:

1. Can agencies point to something another agency has done during 20/21 that has improved multi agency practice?
2. All agencies were asked to RAG rate themselves
3. Can agencies set out their commitment to GSCP multi agency training?
4. Is single and multi-agency training having an impact on practice?
5. How does each agency know they have improved?

3.5 Written Submissions were received from:

- Gloucestershire Clinical Commissioning Group (GCCG)
- Gloucestershire Health and Care NHS Foundation Trust (GHC)
- Gloucestershire Hospitals NHS Foundation Trust (GHT)
- Gloucestershire County Children's Social Care (GCSC)
- Gloucestershire County Children's Commissioning (GCC)
- Gloucestershire Youth Offending Service (YOS)
- Gloucestershire Constabulary (GC)
- Gloucestershire County Council Adult Social Care (GCCASC)
- Cotswold and Forest of Dean District Councils¹
- Stroud District Council
- Tewkesbury Borough Council
- Cheltenham Borough Council
- Gloucester City Council²

¹ Joint submission as both District Councils receive safeguarding support from Publica

² Late submission due to impact of Covid on key staff

3.6 A written response was received from CAFCASS after the panel session as it is a national submission which had not been agreed at the time of the panel session. No submissions were received from the National Probation Service nor British Transport Police³

3.7 Panel attendance: All but Gloucester City Council and the GCC ASC attended the panel session even though this was optional.

3.8 The panel wishes to thank agencies attending for their contribution to the quality of this year's discussions. The outline of these panel meetings with agencies are included as [Appendix 1](#).

3.9 The panel again wish to acknowledge the challenges faced by all agencies during the year. It was clear that the response to Covid 19 had again impacted on them. The evidence continues to confirm that Gloucestershire agencies have responded well to the challenge of the pandemic, finding ways to continue service provision and keep children and young people safe. There was a greater sense that 'business as normal' was beginning to return notwithstanding some suggestions of 'Covid fatigue' particularly amongst front line staff.

3.10 The findings are based on the written submissions and evidence from the discussion at the meetings. The IS also correlates the S11 process with evidence received during the year from key reports, from regulators and other sources of scrutiny of children's safeguarding in Gloucestershire.

3.11 The panel wishes to thank all those participating in this review for the openness of the dialogue and particularly for allocating time to the exercise given the pressures on all agencies at this time.

Kevin Crompton
Independent Scrutineer and Chair of the Review Panel

³ Both agencies work on a two-year S11 cycle.

4. The Findings.

4.1 Table 1 How agencies rate themselves

S11 Standards	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
Cheltenham Borough Council	G	A	G	G
Cotswold & Forest of Dean District Councils	G	G	A	A
Stroud District Council	G	A	G	G
Tewkesbury Borough Council	G	A	G	G
Gloucester District Council	R	G	A	G
Gloucestershire Children Social Care & Commissioning	G	G	G	G
Gloucestershire Constabulary	G	G	A	G
Gloucestershire Hospitals Trust	G	G	A	G
Gloucestershire Health & Care	G	G	G	G
Gloucestershire Adult Social Care	G	G	G	G
Youth Offending Service	G	G	G	G
Gloucestershire Clinical Commissioning Group	G	G	G	G

4.2 Leadership and accountability: Green

- GSCP governance is robust and effective
- The rate of progress against 2020 challenges within main agencies was excellent. As illustrated by the joint work of GCSC /GC; the development of safeguarding systems and structures in GHC; the CCG / NHS providers Strategic Safeguarding Board and most Districts continued to improve levels of training and the work on taxi licensing should be noted.
- There is a high level of compliance with S11 responsibilities in the majority of agencies
- The level of engagement in the S11 review was much improved and more consistent across agencies.
- The seniority of attendees at the panel session was appropriate and enabled a high level of detailed discussion.
- There is clear evidence that partners know their strengths and areas for development and the panel agreed with all the ratings in Table 1.
- The new working arrangements of the GSCP are having a positive impact on partnership working.
- The level of compliance in terms of statutory 'named' and other posts is very high across all agencies.
- Vertical compliance remains high and there has been a significant improvement in the quality of multi-agency working both in terms of governance and practice.
- Professional accountability for safeguarding is clear in the majority of agencies
- The Children's Service Improvement Board continues to provide high quality performance and progress data and continues to be a place where partnership working is considered additionally to the GSCP governance arrangements.
- Most agencies have good systems in place to monitor progress and review practice
- The MASH Board has been formally included in the GSCP governance arrangements and continues to be a forum for reviewing performance.
- QIPP has become focussed on the quality of practice; delivery of multi-agency audits and tracking the implementation of actions resulting from SCRs/RRs and LSCPRs.

- Partners knowledge of each other's work has clearly improved, and the Panel was given a number of examples of how other agencies work had had a positive impact.
- The process for escalation and resolution of inter-agency concerns is much improved with an increase resolution through 'business as usual'.
- The safeguarding partners response indicated that there was more maturity within the GSCP in respect of their being a 'shared and equal' responsibility for safeguarding,
- All agencies talked about the positive working relationships that now characterises GSCP and the benefit of having committed individuals who value joint working

4.3 Staff Safe Recruitment, Induction, Training, and Development – Green

- All agencies have robust safe recruitment practice in place and in some cases, systems have been improved e.g., GCSC
- All agencies are training staff and safeguarding training features in most induction programmes
- Single agency training remains strong and there is an increase in dual and multi-agency training (see Appendix 2)
- There is a greater understanding of the GSCP training offer and 'curriculum'
- There is a good offer based on a blend of 'virtual' and face to face training
- Supervision and management oversight is strong in most agencies
- There were some good examples of dissemination of the learning from SCRs/RRS and LSCPRs e.g., the GHC 5-minute guides

4.4 Safeguarding Policies and Procedures - Green

- All partners are following the GSCP procedures and policies and are compliant
- Agencies have updated and revised policies since 2020
- The GSCP escalation process is well understood and used appropriately
- LADO system remains robust

4.5 Listening to Children and Young People - Green

- There is a strong commitment across agencies to engaging with children and young people and trying to ensure their voice is heard and makes a difference.
- The GCC Ambassadors continue to be engaged by several partners and their feedback to the GCC Improvement Board is welcomed by all partners.
- The Stroud Youth Council were invited to observe and contribute to the S11 panel
- There are some good examples of involving young people in their own care e.g., CAMHS triage

5. Summary.

5.1 The panel concluded that significant progress has been made by many agencies since 2020 and that the evidence provided points to a safeguarding partnership that has 'matured' and is working well in the interests of children, young people and families. A strong characteristic is the willingness to challenge and be challenged in the interests of improving practice.

5.2 The panel noted the levels of commitment and expertise evident in those giving evidence and documentation. It was clear that professional relationships had improved over the year and all agencies could point to the good work of other agencies.

5.3 Agencies were not complacent, and many outlined key areas for improvement in 2022. The panel was for example reassured by the GC action to deal with any risks arising from the issues identified by HMICFRS in the 2021 PEEL assessment. The panel also found other agencies were aware of those issues and similarly had worked with GC to minimise any potential risks to individuals.

6. Recommendations

6.1. 2021 Recommendations

6.2. Stroud District Youth Council - Recommendations:

1. All written reports to the S11 panel should be sent to Youth members prior to the Panel Day
2. A pre meeting of the panel with the Youth members should be put in place
3. The Gloucestershire ambassadors to be invited to work with the Stroud District Youth Council in the future
4. The S11 process could be modified to involve more young people from across the County
5. That young people be involved in a revision of standard four 'listening to the voice of children and young people'

Recommendations:	Response	Responsible/Review
1. The GSCP should monitor the progress being made by the police against the findings of HMICFRS that were identified in the PEEL assessment requesting a paper to the Executive in June 2022	Police to present a paper on activity against the Peel Report – Executive Paper	Executive / June or August Executive 2022
2. In the light of the now published DHR/SCR that the GSCP asks Safer Gloucestershire to assure itself of the robustness of all aspects of support and identification of those experiencing and/or at risk of DA/DV	The Business Unit to work with the County Domestic Abuse and Sexual Violence (DASV) Strategic Coordinator to strengthen links with the DA Local Partnership Arrangements -	GSCP Business Manager / Report back in Nov 2022 S11 process on activity
3. Given the quality of single agency annual reports on safeguarding that GSCP Executive takes steps to ensure they are regularly shared across the partnership and reviewed through the appropriate subgroup	Partners to be reminded and reports shared.	GSCP Business Manager / Report back in Nov 2022 S11 process on activity
4. That GSCP has further discussion through the District subgroup on support available to ensure all Districts are at high levels of compliance and that the best of current work is the norm for all.	District Subgroup Activity	District Subgroup Members / Report back in Nov 2022 S11 process on activity

<p>5. That GSCP Executive note the important role being played by the GSCP Business Unit as acknowledged by all partners.</p>	<p>360 Degree Review of the Role of the Business Manager</p>	<p>Executive / May 31st 2022</p>
<p>6. That the 2021 S11 methodology be retained for 2022 but modified to require all local agencies to attend the panel session</p>	<p>To be considered via Management Group</p>	<p>Management Group / Report back in Nov 2022 S11 process on activity</p>
<p>7. GSCP Education & Early Years Subgroup should review the outcomes of the S175 audit and consider the issues raised during this audit regarding some school's response to challenging behaviour/ safeguarding.</p>	<p>Education and Early Years response to S175/157 and Early Years Safeguarding Health check 2021/2022 due to be released in May 2022</p>	<p>Education & Early Years Subgroup / July/August 2022</p>
<p>8. All partners and relevant agencies must continue to promote involvement in multi- agency training for appropriate staff.</p>	<p>Review and report via the Quality Assurance Reference Group on MA Training membership and attendance for appropriate staff.</p>	<p>QiiP Subgroup Nov 22 and March 23 Districts Subgroup Nov 22 and March 23</p>
<p>9. Many agencies talked about the benefits of 'blended' working and GSCP should seek to retain the benefits in key areas e.g., virtual attendance of some professional groups at strategy and other key meetings</p>	<p>Return to F2F meetings Planning and Coordination</p>	<p>GSCP Business Manager / Through 2022 Report back in Nov 2022 S11 process on activity</p>
<p>10. All agencies should have systems in place to evaluate the impact of training on practice.</p>	<p>Quality Assurance Reference group to monitor and feedback</p>	<p>QiiP Subgroup / March 2023</p>
<p>11. GSCP should work with GHT to revise the MARF process to better reflect the situation within the Trust. (Develop a similar process as the VIST)</p>	<p>Strategic Health Group to feedback and progress. Reporting to both the QiiP and MASH/CSPA Subgroups. Links to MA Audit on Thresholds</p>	<p>MASH/CSPA Subgroup / Autumn 2022 QiiP Subgroup / Autumn 2022</p>
<p>12. GHC to share the outcomes of their internal surveys on embedding the neglect tool kit and MARFs with QIPP.</p>	<p>GHC to produce a feedback paper on progress to the QiiP</p>	<p>QiiP Subgroup / Autumn 2022</p>

13. GSCP should monitor the progress with all Districts adopting the proposed common standards for licensing Taxi Drivers	Agenda items for the Districts in Feb 2022 and May 2022. Oversight on how the common standards is applied in relation to Allegations management and clear lines of responsibility through to Licensing Oversight and Scrutiny	Common Licensing Standards adopted across all Districts licencing departments 2021. Districts Subgroup / August 2022
14. GSCP should continue to monitor the proposed transition /integration of NHS safeguarding teams as the Integrated care System develops.	Health Strategic Group to feedback to the Executive	Strategic Health Group & Executive / Dec 2022
15. The CCG to review the effectiveness of hearing the voice of children and young people by GPs	Health Strategic Group to feedback through 2022 – 2023 S11 process	Health Strategic Group / November 2022

2020 Recommendation		Progress
1	The GSCP should consider giving greater visibility to their overarching strategy including the commitment to Child Friendly Gloucestershire	Complete
2	The GSCP should consider developing a more visible plan that captures the improvement work being done between agencies	In Progress
3	The GSCP should consider the overall training being utilised across the partnership and consider whether alignment is sufficient to underpin multi agency working	Complete
4	The GSCP should review its commitment to all agencies attending relevant multi agency training	In Progress
5	The safeguarding partners should share more of the information they use themselves to quality assure their safeguarding activity	In Progress
6	This S11 process could be improved by a greater lead in time, a standard template and a consistency in terms of seniority of representative attending	Complete
7	Include an ambassador or other group of Young People on any future S11 panels	Complete
8	The partnership needs to continue to monitor the speed and effectiveness of partners response to recommendations from SCRs, RRs and LCSPR'	In Progress

7. Conclusion

7.1 This audit confirms that the partnership is making progress towards being a good safeguarding partnership. There was evidence of improved interagency working in a number of areas. In particular, the regular meetings between GCSC and GC; the continued work of the NHS Strategic Safeguarding Board; and the good level of engagement by most partners in the GSCP subgroups. All agencies stated that they felt that the current level of partnership working was the best they had experienced in the County. This was attributed to the better governance structure and the attitude and commitment of individuals involved. Agencies also demonstrated a good understanding of themselves and the areas where progress had been

made and those where further work would be needed. The Districts had made good progress in areas such as licensing but there was still a feeling that they could achieve more consistency across the 6 and there are specific issues to be addressed with Gloucester City Council as indicated by their own self-assessment. Progress with multi agency training had been made and there was a greater understanding of the GSCP training 'offer' and 'curriculum'. The numbers attending multi agency training from GCSC remain low despite the overall investment in training and development through the 'essentials' training and other programmes. There had been some good joint work between GCSC and GC. Panel noted also the success of the e learning programmes in attracting higher numbers of participants.

7.2 There are numerous examples of good practice noted in the panel sessions and there was increased evidence that agencies were trying to share the learning from RRs and LSCPRs. This was however not consistent across all agencies and more work is needed in this area of activity. It is hoped that this report will help agencies to reflect on what can be learned from the work of other partners.

7.3 The good progress made by GHC following the merger of the 2 former organisations was noted by the panel.

7.4 Many agencies could point to improvements in the way they sought to hear and act on the voice of children and young people. The participation of the Stroud District Youth Council was excellent, and their recommendations are included in this report and a separate report. The work of the GCC ambassadors continues to be valued by all agencies.

7.5 The partnership has not fully implemented the recommendations from the 2021 S11 review and this needs to be addressed going forward.

7.6 Overall this audit has found evidence of a high level of understanding and compliance with S11 responsibilities and duties; a good level of commitment from agencies to joint working; good self-awareness; an improvement in working relationships since the 2020 review and a general feeling that partnership working has reached a better level under Gloucestershire's WT18 arrangements.