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Archwilydd Cyffredinol Cymru
Auditor General for Wales

Review of Corporate Safeguarding Arrangements in Welsh Councils



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU



I have prepared and presented this report under the Government of Wales Act 1998 and the Public Audit (Wales) Act 2004.

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Summary report

Welsh councils' corporate assurance arrangements for overseeing the safeguarding of children are of variable quality



- 1 All children have a right to protection against abuse, neglect, exploitation and violence and councils have a statutory duty to safeguard and promote the welfare of children and young people. Under **Safeguarding Children: Working Together Under the Children Act 2004**¹ (Working Together), local authorities have a statutory duty to have in place safeguarding arrangements for children, which include strategic planning, directly delivering services, and providing support and guidance to providers of commissioned services. Local authorities also have a duty to work in partnership with others to secure the safeguarding and well-being of children in their area, including participating in their local safeguarding children board.
- 2 On behalf of the Auditor General, staff of the Wales Audit Office have examined the extent to which councils have put in place, and are operating, effective management and assurance processes and controls for safeguarding children. Our methods are set out in [Appendix 1](#). In summary, we undertook fieldwork at all 22 Welsh councils; surveyed local authority staff and elected members²; and reviewed relevant research and guidance from the Care and Social Services Inspectorate Wales and Estyn.
- 3 Our review specifically considered the effectiveness of safeguarding arrangements within two selected services, as a means of testing the corporate assurance arrangements within councils as a whole. The services we selected are:
 - a Education services – All schools, including independent schools, non-maintained schools and further education institutions have a statutory duty to exercise their functions with a view to safeguarding and promoting the welfare of their pupils.
 - b Cultural and leisure services – A local authority provides and enables a wide range of facilities and services for children such as libraries and leisure centres and parks. Their employees, volunteers and contractors have different levels and types of contact with children who are users of these services.
- 4 Our findings and recommendations are set out in [paragraph 12](#).

¹ **Safeguarding Children: Working Together Under the Children Act 2004**, Welsh Government, September 2006

² We undertook a survey of local authority staff working in leisure, cultural services and libraries and education non-schools-based staff; schools-based staff; head teachers; chairs of governors; and all elected members. We received 1,990 responses in total: 185 from chairs of governors, 331 from elected members and 1,474 from council staff.

Welsh Government guidance, which sets out the safeguarding arrangements it expects councils to put in place, is not sufficiently clear and compliance with guidance by councils varies

- 5 Welsh Government policy Working Together sets out clear expectations of corporate and senior officer and member leadership on safeguarding matters, with corporate responsibilities for planning improvements. However, we found that not all councils have established lead directors for safeguarding and the role of the lead member for safeguarding is underdeveloped and not well understood in many councils.
- 6 Although councils are generally clear that they should have an identified person responsible for safeguarding in education as set out in the Welsh Government's policy **Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002**³ (Keeping Learners Safe) councils are sometimes confused about responsibilities for safeguarding generally at a senior level across the whole authority as set out in Working Together. This may be because there is some lack of consistency in both the Welsh Government's guidance in relation to the terms used for those responsible for safeguarding at senior and operational levels and how their responsibilities are described in the two guidance documents and how councils have interpreted these two documents.
- 7 We also found that councils are working with partners as part of local safeguarding children boards to provide a strategic overview on safeguarding. The development of regional joint working is supporting effective inter-agency planning. However, we found that safeguarding policies and procedures are not always up to date and need to be reviewed to align better with Welsh Government guidance and to cover all relevant council services.

Council-wide arrangements for safe recruitment and training do not always provide assurance that corporate safeguarding responsibilities are being discharged effectively

- 8 Finding, recruiting and training the right people to work with children can be difficult. We found that most councils have established systems for the safe recruitment of staff that will come into contact with children and their families. Whilst we found examples of good practice, we also found some common weaknesses such as these arrangements not being consistently applied across all relevant council services.

³ **Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002**, Welsh Government, January 2015

- 9 Likewise, training on safeguarding for employees and elected members who work with, or come into contact with, children and families is not consistently embedded in all councils. In some councils, training programmes on safeguarding are restricted to core services, such as education and social care; or delivered as discretionary rather than mandated training. And we found evidence of weaknesses in some councils of poor systems to identify, track and monitor attendance on safeguarding training.
- 10 In many councils, safeguarding is too focused on education and social care and more needs to be done to ensure that corporate safeguarding responsibilities are fully integrated with the work of other services that have regular contact with children and young people such as leisure, libraries and housing.

Safeguarding arrangements are not consistently monitored and evaluated by councils as part of their corporate scrutiny, internal audit and risk management arrangements

- 11 The work of councils' scrutiny committees, risk management and internal audit functions are essential and integral parts of a council's assurance framework and decision-making arrangements. We found that limitations and weaknesses in the monitoring and evaluation of corporate safeguarding were undermining effective scrutiny within councils. Internal audit is not used in most councils to review safeguarding practices. Risk management arrangements are not always robust enough to provide assurance that safeguarding is effectively managed.

Recommendations

12 The key recommendations arising from the work we carried out are that councils should:

Recommendation	Responsible partners
<p>R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ul style="list-style-type: none"> • the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; • the appointment of a lead member for safeguarding; and • regularly disseminating and updating information on these appointments to all staff and stakeholders. 	Councils
<p>R2 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>	Councils
<p>R3 Strengthen safe recruitment of staff and volunteers by:</p> <ul style="list-style-type: none"> • ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment 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; and • 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. 	Councils
<p>R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p> <ul style="list-style-type: none"> • ensuring safeguarding training is mandated and coverage extended to all relevant council service areas, and is included as standard on induction programmes; • 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 • 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. 	Councils

Recommendation	Responsible partners
<p>R5 In revising guidance, the Welsh Government should clarify its expectations of local authorities regarding the roles and responsibilities of the designated officer within education services, and the named person at senior management level responsible for promoting the safeguarding.</p>	Welsh Government
<p>R6 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"> • benchmarking and comparisons with others; • conclusions of internal and external audit/inspection reviews; • service-based performance data; • key personnel data such as safeguarding training, and DBS recruitment checks; and • the performance of contractors and commissioned services on compliance with council safeguarding responsibilities. 	Councils
<p>R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the council's safeguarding practices.</p>	Councils
<p>R8 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>	Councils

- 13 We have also set out in [Appendix 2](#), the key assurance requirements for effective corporate safeguarding arrangements, as a checklist for councils to review their current performance.

Part 1

Welsh Government guidance, which sets out the safeguarding arrangements it expects councils to put in place, is not sufficiently clear and compliance with guidance by councils varies



- 1.1 All children have a right to protection against abuse, neglect, exploitation and violence and councils have a statutory duty to safeguard and promote the welfare of children and young people. Safeguarding, however, is far more than child protection. Child protection is specifically about protecting children and young people from suspected abuse and neglect. Safeguarding is much wider and includes everything a council can do to keep children and young people safe, including minimising the risk of harm and accidents, taking action to tackle safety concerns and ensuring children grow up in safe circumstances.
- 1.2 Safeguarding is also about being able to respond quickly and appropriately to concerns or allegations brought to the council, which means having the right policies and procedures in place to deal with difficult situations if they arise. Clearly, it is in the best interest of councils and their service users to have effective safeguarding systems and practices in place. One of the most important principles of safeguarding is that it is everyone's responsibility. Each professional and organisation must do everything they can to ensure that children and adults at risk are protected from abuse.
- 1.3 This part of the report considers the key issues set out in the Welsh Government policy framework for safeguarding and comments on how councils in Wales are currently working to meet these commitments. We consider the effectiveness of corporate leadership on safeguarding; the roles of the lead director and lead member; awareness amongst council and schools-based staff and members on safeguarding policy issues; and the effectiveness of local safeguarding boards.

Some councils are unclear about their corporate safeguarding responsibilities

- 1.4 The Welsh Government policy framework for safeguarding is set out in **Safeguarding Children: Working Together under the Children Act 2004**⁴ (Working Together). Working Together notes that improved outcomes for children can only be delivered and sustained when key people and bodies work together to design and deliver more integrated services around the needs of children and young people. Such an approach needs to be led and managed at a local level and supported nationally, and requires improved joint working between the Welsh Government and its partners, and between those partners and children, young people and their families and communities.
- 1.5 Working Together sets out some key underlying principles for the establishing and management of effective safeguarding arrangements. These include:
 - a all key people and bodies work in partnership to achieve shared outcomes;
 - b clear overall accountability exists for all services;
 - c key local services are integrated, where appropriate, around the needs of children and young people, and children and young people are actively involved in developing and evaluating the services which are provided for them;

⁴ **Safeguarding Children: Working Together Under the Children Act 2004**, Welsh Government, September 2006

- d key people and bodies work well individually and together through universal, targeted and specialist services to safeguard and promote the welfare of children; and
 - e children, young people and their families receive effective support at the first sign of difficulties.
- 1.6 The key agencies identified in Working Together are local authorities; the police; the probation service; NHS trusts; and local health boards. An awareness and appreciation of the role of others is essential for effective collaboration between these agencies and joint working should extend across the planning, management, commissioning/provision and delivery of their respective services.
- 1.7 Working Together requires chief officers and senior managers to provide strong leadership, to establish clear, appropriate and effective accountability and decision-making arrangements and ensure that human and financial resources are deployed efficiently to provide high-quality services. Councils are also required by Welsh Government guidance to work with partners in the establishment and effective operation of local safeguarding children boards. Councils are required to have developed a clear written statement of their responsibilities towards children that is available for all employees and have established a clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children.
- 1.8 Chief officers and senior managers also have statutory responsibilities for monitoring the actions of their employees to safeguard and promote the welfare of children. Welsh Government guidance requires councils to ensure their services are provided in a framework within which organisations and individuals are accountable for the quality of their practice and services and for providing the best possible standard of safeguarding. Similarly, staff need to be properly trained, competent and accountable for their conduct and practice.
- 1.9 The statutory basis for safeguarding is changing with the implementation of the **Social Services and Well-being (Wales) Act 2014**, which is due to be implemented in April 2016, introduces new requirements to strengthen and improve safeguarding. This includes the creation of a National Independent Safeguarding Board and revised expectations of the role and work of local safeguarding children boards. Part seven of the 2014 act also clearly sets out the responsibilities of key people and bodies to make arrangements to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children.
- 1.10 The welfare of children is the corporate responsibility of the entire local authority because all local authority services have an impact on the lives of children and families, and local authorities have a particular responsibility towards those children and families most at risk of social exclusion. A successful safeguarding approach therefore requires effective internal working, collaboration, corporate leadership, and recognition of the importance of child well-being.

- 1.11 We undertook a survey of local authority staff working in leisure, cultural services and libraries and education non-schools-based staff; schools-based staff; head teachers; chairs of governors; and all elected members. Identical surveys were used for each group to ensure findings could be compared. We received 1,990 responses in total: 185 from chairs of governors, 331 from elected members and 1,474 from council staff. The survey enabled us to check awareness and understanding of safeguarding and test compliance with key requirements of Working Together.
- 1.12 Our survey found that the majority of respondents, 95.3 per cent, agreed that safeguarding and protecting children and young people is a high priority for their council. However, as Exhibit 1 shows, some members, council staff and chairs of governors do not know that everyone is responsible for safeguarding and protecting children and young people in their council – Exhibit 1.

Exhibit 1 - The person(s) survey respondents identified as being accountable for safeguarding and protecting children and young people in their council

Only 64 per cent of respondents understood that all council staff, elected members and schools governors have responsibilities for safeguarding and protecting children and young people in their council.

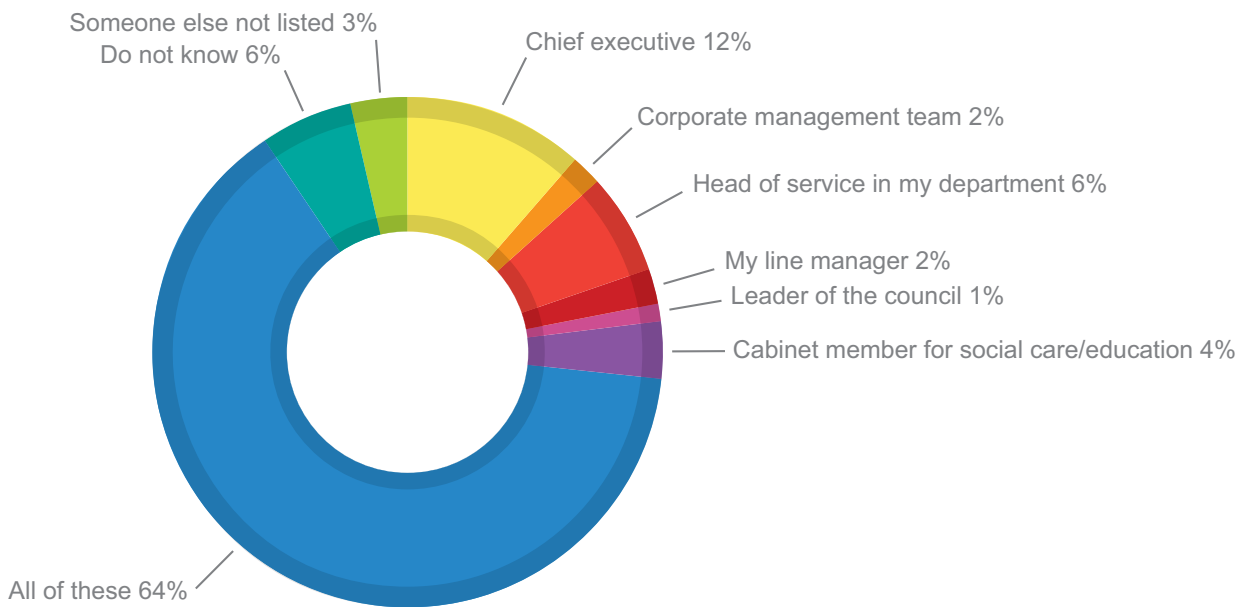


Exhibit source: Wales Audit Office Safeguarding Survey, 2013-14

- 1.13 The results of our survey suggest that councils have much more to do to ensure safeguarding is fully embedded. Our survey found that 11.3 per cent of chairs of governors and 8.6 per cent of operational staff did not know who was accountable for safeguarding within their council. In addition, within services, 7.6 per cent of schools-based staff and 8.6 per cent of leisure, cultural and libraries staff similarly stated that they did not know who was accountable for safeguarding within their council. Taken together, the findings from our survey show that councils need to do more to ensure that all those who have a role in safeguarding young people understand their responsibilities, and the lines of accountability for safeguarding within their authority.
- 1.14 We found that the majority of authorities had established some form of corporate board to provide oversight and corporate leadership on safeguarding. The best examples are where members and senior managers take collective responsibility for safeguarding and have established committees and/or performance boards with membership drawn from all services, which have responsibility for strategic oversight of safeguarding matters. For example, the Corporate Parenting Cabinet Committee in Bridgend County Borough Council which has a wide membership drawn from all council directorates and includes the executive team, cabinet and scrutiny committees.
- 1.15 However, we also identified some weaknesses in corporate arrangements in some councils, particularly where the authority was undergoing significant management change with new senior managers taking up post, and a change in management responsibilities and organisational structure. This often resulted in councils needing to establish new systems and processes for managing safeguarding. These changes did not provide assurance that the councils' safeguarding work, at a corporate level, was operating effectively.

Not all councils have established a named senior person for safeguarding with corporate responsibilities for promoting improvements

- 1.16 Working Together requires councils to identify a named person at the senior management level to promote the importance of safeguarding and to uphold the welfare of children throughout the organisation. The lead director is accountable to the chief executive for carrying out the tasks set out, and thence to the members of the authority's executive, and overview and scrutiny committees. Working Together stipulates that lead directors must be senior officers capable of exercising the authority necessary to lead a change process that will have an impact on the understanding and approach of their peers to partnership working. These aspects have added importance given the lead position of local authorities in promoting partnership working on safeguarding. [Exhibit 2](#) explains the role of the lead director.

Exhibit 2 - Working Together clearly identifies the role of the lead director who is responsible for safeguarding in local authorities



Exhibit source: **Safeguarding Children: Working Together under the Children Act 2004**, Welsh Government, September 2006

- 1.17 Our review found that many councils have designated a lead officer for safeguarding who has responsibility to lead on this work within the council and across departments and services. However, in a number of councils we found that there is a general lack of awareness amongst senior officers and members on who fulfils the role of the lead director for safeguarding. To compound the lack of clarity, in some councils there is no one single lead, with the council creating leads in different services.
- 1.18 For example, we found in a small number of councils that there are separate managers in social services and education who jointly deliver the key responsibilities of the lead director. In other councils, we found that there was no lead director for safeguarding. The lack of a named senior officer who takes corporate responsibility for leading on promoting safeguarding is a major weakness in ensuring that appropriate information-sharing arrangements are established, good-quality advice and policy guidance are in place, and systems to deliver services work effectively. A weakness in corporate leadership on safeguarding also weakens councils' accountability arrangements for safeguarding.

1.19 Only 67.4 per cent of those who responded to our survey stated that they knew who their council's designated officer was. Our survey also identified that there is a particular lack of awareness in leisure services, cultural and libraries services and amongst chairs of school governors, operational members of staff and administration staff. This is of particular concern as many of these services and staff have direct contact with children. Exhibit 3 highlights the awareness levels between sectors.

Exhibit 3 - Many survey respondents are uncertain who the lead director accountable for safeguarding in their council is

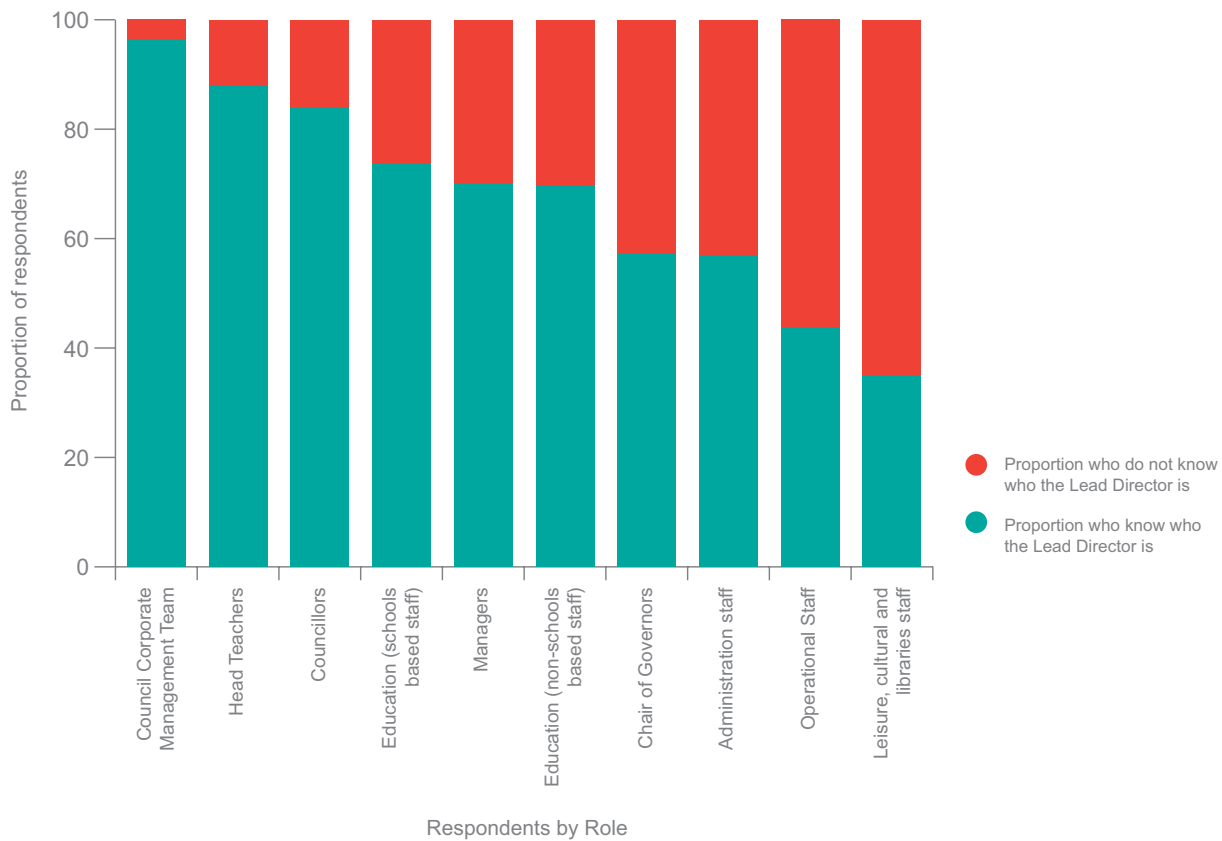


Exhibit source: Wales Audit Office Safeguarding Survey, 2013-14

- 1.20 Although councils are generally clear that they should have an identified person responsible for safeguarding in education as set out in the Welsh Government's Keeping Learners Safe⁵ guidance, they are sometimes confused about responsibilities for safeguarding at a senior level across the whole authority as set out in Working Together. This may be because there is some lack of consistency in the Welsh Government's guidance in relation to the terms used for those responsible for safeguarding at senior and operational levels and how their responsibilities are described in the two guidance documents.
- 1.21 For example, the Keeping Learners Safe guidance states that there should be a designated officer to deal with child protection and safeguarding issues in education. This causes some confusion and a lack of clarity over the distinction between this role and the 'senior named individual'. The Welsh Government needs to ensure that the guidance documents are better aligned and complement each other.

The role of the lead member for safeguarding is underdeveloped and not well understood

- 1.22 As well as having a lead officer, Working Together also requires councils to designate a lead member for children and young people's services for the purposes of co-ordinating and overseeing local arrangements. The lead member's role mirrors the lead director's role but at the political level. The lead member will be responsible within the political process for promoting the authority's lead role in enabling partnership working, and ensuring that decision-making processes give due weight to the need for co-operation across partners.
- 1.23 As an elected member of the council, the lead member should support the development of a strategic direction for local authority services and should be a member of the authority's executive with responsibilities broadly mirroring those functions for which the lead director has responsibility. As a member of the local authority executive, the lead member will be in a position to highlight the accountability of chief officers to the chief executive and elected members for their particular service's contribution to improving outcomes for children and young people, and to meeting their safeguarding responsibilities.
- 1.24 We found some good examples of strong political leadership of safeguarding in a number of Welsh councils. For example, Denbighshire County Council has created a Cabinet Member for Safeguarding and created a specific Safeguarding Scrutiny Committee drawing representation across services. Likewise, Ceredigion County Council has also created a lead Cabinet Member for Safeguarding and the Cabinet Member for Children's Services, Education and Skills at Conwy County Borough Council has the role of children's champion.

⁵ Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002, Welsh Government, January 2015

1.25 Exhibit 4 shows that over 55 per cent of survey respondents do not know who the council's lead member for safeguarding is. In each of the services and the different grades of staff we surveyed, less than half know who the lead member for safeguarding and child protection is except for senior managers and councillors.

Exhibit 4 - The majority of survey respondents do not know who the lead member accountable for safeguarding in their council is

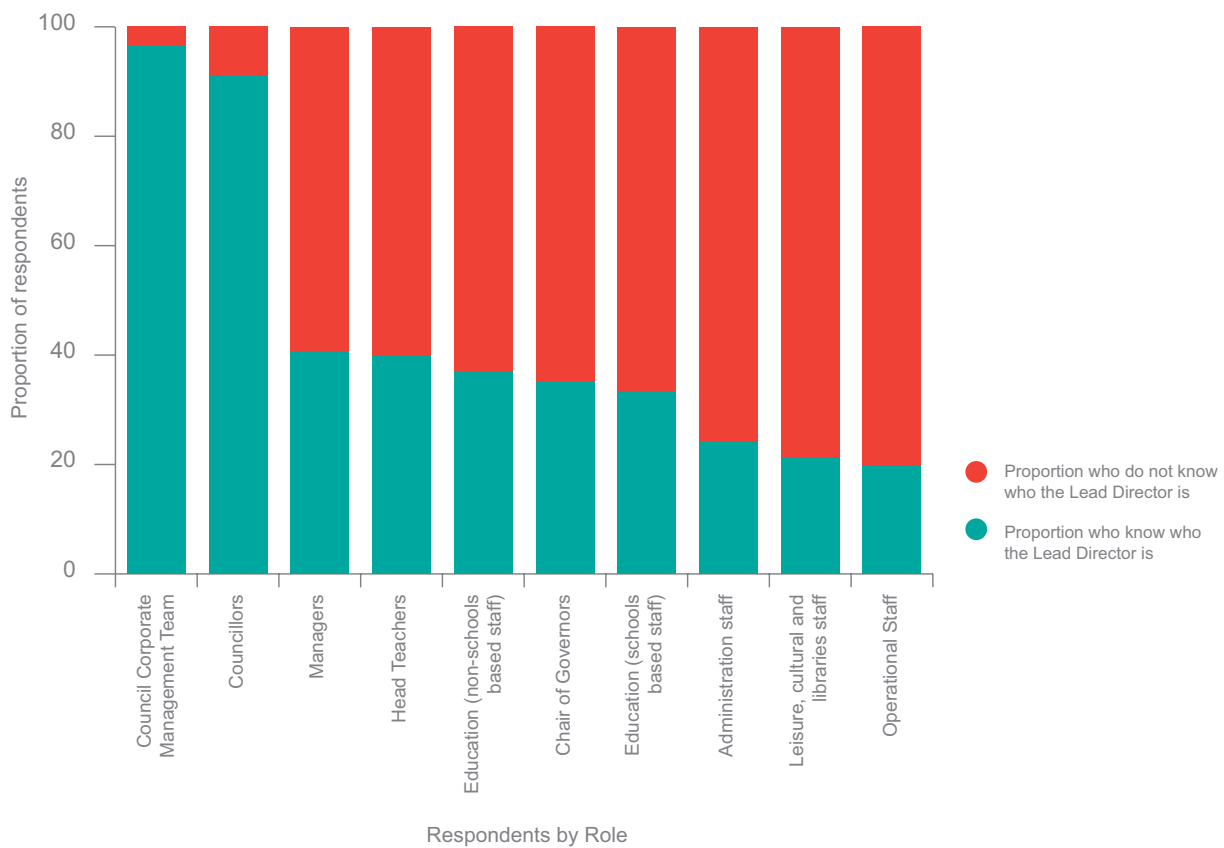


Exhibit source: Wales Audit Office Safeguarding Survey, 2013-14

Local safeguarding children boards are providing some strategic direction and the development of regional joint working supports effective inter-agency planning, but safeguarding policies and procedures should align better with Welsh Government guidance and need to cover all relevant council services

- 1.26 Local authorities have a statutory duty to plan services for children in need, in consultation with a wide range of other agencies, and councils must take the lead responsibility for the establishment and effective functioning of local safeguarding children boards – the inter-agency forum which acts as a focal point for local co-operation to safeguard children.
- 1.27 The aim of local safeguarding children boards is to promote high standards of safeguarding work and to foster a culture of continuous improvement. Local safeguarding children boards also have responsibility to develop criteria for measuring the performance of children’s services in meeting their local children and young people’s plan priorities, as far as the plan relates to safeguarding and promoting the welfare of children. In thinking more corporately about what will benefit local citizens, some authorities have put in place management structures that cut across traditional departmental and service boundaries.
- 1.28 For example, the South East Wales Safeguarding Children Board covers the five Gwent councils and was set up in April 2013. This is a multi-agency partnership comprising of representatives from Gwent Police, social services and education directorates from the five councils, the voluntary sector, youth offending services, the All Wales Probation Trust, the Children and Family Court Advisory and Support Service Cymru, housing associations, Public Health Wales and Aneurin Bevan Health Board. The purpose of the South East Wales Safeguarding Children Board is to ensure safeguarding children remains high on the agenda across the region. Similarly, Rhondda Cynon Taf and Merthyr Tydfil county borough councils have created the Cwm Taf Safeguarding Children Board.
- 1.29 In addition to creating joint safeguarding boards, councils are also required to have a clear policy statement of their specific responsibilities in respect of children that should be available for all employees in all services. This statement should apply to any children in the care of the council, any with whom they work directly and those with whom they or their clients come into contact. Whilst this statement can form part of a council’s existing policy and/or procedures, all employees should be made aware of the policies and procedures on safeguarding and promoting the welfare of children, and the importance of listening to children and young people, particularly when they are expressing concerns about their own or other’s welfare.

- 1.30 Our review found that most councils have developed a corporate-wide policy on safeguarding to provide strategic direction for their work. For example, Denbighshire County Council, through full council, adopted a corporate safeguarding policy and action plan to support improvement. The council recognised that it needed to strengthen its corporate focus on safeguarding to make it everybody's business in every service within the council. Indeed, the council has made safeguarding one of its corporate priorities to ensure that vulnerable people are protected and are able to live as independently as possible.
- 1.31 However, in a small number of councils we found that there are service-specific child protection policies in place covering, for example, schools, education, social care, housing and leisure services but these were not aligned with a corporate-wide safeguarding policy to ensure all services are acting consistently. Such a piecemeal approach to the creation and review of policies weakens local assurance arrangements and councils need to ensure that they align service-level safeguarding and child protection policies with a corporate policy.
- 1.32 We also found that a significant number of councils are using the **All Wales Child Protection Procedures**⁶ but have not developed a corporate safeguarding policy that sets out their local circumstances, context and priorities for improvement. In addition, a small number of councils had developed overarching corporate-wide safeguarding policies but these are predominantly based on specific services – most usually education and social care – and consequently do not provide a corporate overview and have only limited reference to other areas of council operation.
- 1.33 Our survey found that 83.9 per cent of respondents agreed that policies and procedures for safeguarding and protecting children and young people are clear for their council. Whilst only 6.5 per cent disagreed with this position, these respondents were mainly operational staff and service managers, and primarily worked in leisure, cultural and libraries services. This highlights that awareness and ownership in these services is not as well embedded as in education services. This is borne out by the positive response rate from schools-based staff where 93.6 per cent of respondents agreed that policies and procedures for safeguarding and protecting children and young people are clear for their school.
- 1.34 In terms of engagement with parents, only 55.1 per cent of respondents to our survey agreed that their council informs all parents how their children are safeguarded and protected when using council services and schools. 12.3 per cent disagreed with this statement and just under a third of respondents (32.6 per cent) stated they did not know. This included just under half of the operational staff who responded to our survey (44.2 per cent) and significant numbers of leisure, cultural and libraries employees (45.1 per cent) staff; central education staff (36.9 per cent); and schools-based staff (27.4 per cent). This highlights that internal communication with frontline services and the flow of information between the council and service users is an area that could be significantly improved.

6 **All Wales Child Protection Procedures 2008**, www.awcpp.org.uk

1.35 We asked staff in education and leisure, cultural and library services whether their views are taken into account when policies relating to safeguarding and protecting children and young people are being reviewed. We found that 57.5 per cent of respondents felt that their views were taken into account, whilst 21.2 per cent disagreed and 21.3 per cent did not know. This highlights that more needs to be done by councils to ensure staff views are taken into consideration when shaping operational policies for safeguarding.

Part 2

Council-wide arrangements for safe recruitment and training do not always provide assurance that corporate safeguarding responsibilities are being discharged effectively



- 2.1 Finding, recruiting and training the right people to work with children can be difficult. Recruitment and training processes need to cover everyone who comes into contact with children and their families, and those that have a role to play in safeguarding children. All staff should be aware of systems within the council that support safeguarding, and these should be explained to them as part of their induction. This may include a council's child protection policy; staff behaviour policy (sometimes called a code of conduct); allegations and disciplinary policies; and details about the roles of designated safeguarding lead officer(s).
- 2.2 Working Together requires councils to ensure that all staff have received appropriate child protection training which is regularly updated. Staff should be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of help or protection. In this part of the report, we assess councils' recruitment and training arrangements and whether these are providing adequate assurance that systems to recruit and train staff are working effectively.

Most councils have established systems for the safe recruitment of staff, but these arrangements are not consistently applied across all relevant services

- 2.3 It is vital that councils create a culture of safe recruitment and adopt recruitment procedures that help deter, identify and reject people who might pose a risk to children. Councils must act reasonably in making decisions about the suitability of prospective employees based on checks and evidence including: criminal record Disclosure and Barring Service⁷ (DBS) checks; barred list checks; employer and personal references; and information obtained at interview.
- 2.4 People who are responsible for recruiting employees to work with children and their families must have the appropriate training. Where a criminal record check is mandatory on employment, these must be undertaken routinely and repeated at regular intervals throughout the period of employment. Where appropriate, a disclosure should be obtained from the DBS and most councils we reviewed had established processes for safe recruitment.
- 2.5 All agencies and organisations whose staff, volunteers or foster carers work closely with children should have policies and procedures in place to deter those who are unsuitable to work with children. Key to this is ensuring that safe recruitment procedures are in place, and developing effective policies and protocols on information sharing both within the council and with other agencies.
- 2.6 Our review identified some good approaches to safe recruitment and we highlight these as good practice.

⁷ The DBS helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau and Independent Safeguarding Authority.

Bridgend County Borough Council

Bridgend County Borough Council's central Human Resources team has established a system that ensures that all posts requiring DBS checks are identified and the potential post holders are appropriately checked when employed, and also checked on a three-yearly basis. Service specifications for relevant outsourced services include reference to the need for staff DBS checks and safeguarding training. Internal audit checks have been made on DBS checks, such as with volunteer drivers.

Newport City Council

Newport City Council recruitment and selection functions are now operated by one Human Resources team and have been brought together to ensure there is a consistent approach to safe recruitment across the council. Where a post is identified as requiring either a standard or an enhanced DBS disclosure check, a prospective employee may not commence work until the disclosure check has been received from, and assessed by, Human Resources and the appointing manager. Whilst the council does employ staff pending DBS checks, they are not allowed to work at premises with children until appropriate DBS checks have been received and signed off.

Wrexham County Borough Council

Wrexham County Borough Council has developed a specific Safe Recruitment Policy, which sets out the council's expected standards of safe recruitment and retention of staff working with vulnerable groups, including children. This complements the council's Recruitment and Selection Policy, which sets out the wider pre-employment checks that are undertaken. This is also supported by a Safe Recruitment Guidance manual, which provides a range of information to guide managers through the process of safe recruitment. Training on safe recruitment is mandatory for all relevant staff and is also included in all third-party contracts, and the council has established clear guidance for schools on the engagement of agency teaching staff who provide short-term cover in schools.

- 2.7 However, we also identified some examples of weaknesses in systems in some councils that need addressing, including:
- a DBS checks and compliance with safe recruitment policies that did not cover all services and staff that come into regular contact with children;
 - b poor record keeping, whereby records did not cover all services and schools to ensure that all services and staff who should comply with their corporate safeguarding responsibilities, are doing so;
 - c separate recruitment systems for education, schools, social care and/or other departments, which have resulted in different approaches being used which do not provide adequate assurance that corporate arrangements are effective;
 - d manual systems for the management of safe recruitment and DBS compliance checks which undermine management of these schemes; and
 - e limited promotion of the need for safe recruitment practices amongst partners especially 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.
- 2.8 We found that 95.5 per cent of those responding to our survey felt that they were clear how their current job or role contributed to safeguarding and protecting children and young people in their council. However, only 75 per cent of respondents agreed that these responsibilities had been formally and clearly explained to them when they started in their current role in the council or school. A significant proportion (23.2 per cent) reported that they were not informed of their personal responsibilities for safeguarding and 1.8 per cent could not recall if these accountabilities had been explained to them.

Training on safeguarding for elected members and employees who work, or come into contact, with children and families is not consistently embedded in all councils

- 2.9 Councils need to develop and provide ongoing training on safeguarding issues and on how to promote the welfare of children for all employees working, or who come into contact, with children or their families. This should not be restricted to education and social services, and councils need to ensure that they prioritise and raise awareness amongst all employees of their role in the safeguarding of children. Councils should also, where appropriate, enable their employees to participate in training provided on an inter-agency basis.
- 2.10 In exercising their duty to safeguard and promote the welfare of children, councils need to ensure that:
- a all employees working, or in contact with, children and families participate regularly in relevant training tailored to their individual roles;

- b senior employees are kept up to date with changes in statutory requirements and new evidence-based ways of working with children and families so that the relevant information can be cascaded down to those on the front line;
 - c training for employees working, or in contact, with children and families or with adults who pose a potential risk to children is provided on both a single agency and an inter-agency basis;
 - d these employees have access to this guidance and are trained in how to implement it effectively;
 - e employees understand both their own roles and responsibilities and those of other professionals and organisations for safeguarding and promoting the welfare of children; and
 - f employees have awareness of diversity issues including race, culture and disability, and the impact they have on family life.
- 2.11 Many Welsh councils have reviewed their training and development programmes to strengthen current practices, and we identified a number of positive themes emerging in this area amongst the better-performing authorities. For example:
- a safeguarding included as a standard item as part of a council's induction programme for all new starters, including tailoring of the training to reflect the different roles and responsibilities of officers in different services and at different levels of seniority;
 - b refresher training being provided to staff, elected members, school governors, partners and volunteers when policies, procedures, legislation or serious case reviews require a change in policy and/or local operational arrangements;
 - c rolling programmes of safeguarding training to maximise awareness and understanding, especially amongst frontline services, which are managed and delivered centrally to ensure high levels of take up in all service areas;
 - d making it a standard clause in contracts that partners and contractors undertake safeguarding training on children and young people services and ensuring that safeguarding training is open to voluntary organisations; and
 - e using the annual personal development review and development process to check that all appropriate staff and volunteers have been trained in children's safeguarding and identifying when refresher training is required.
- 2.12 **Exhibit 5** shows that the majority of most survey respondents – 84 per cent – stated that they have received safeguarding training, 10 per cent stated that had not and six per cent could not recall if they had.

Exhibit 5 - Provision of training on safeguarding to elected members, council staff and chairs of school governors

Most survey respondents have received training on safeguarding but 10 per cent of respondents have not.

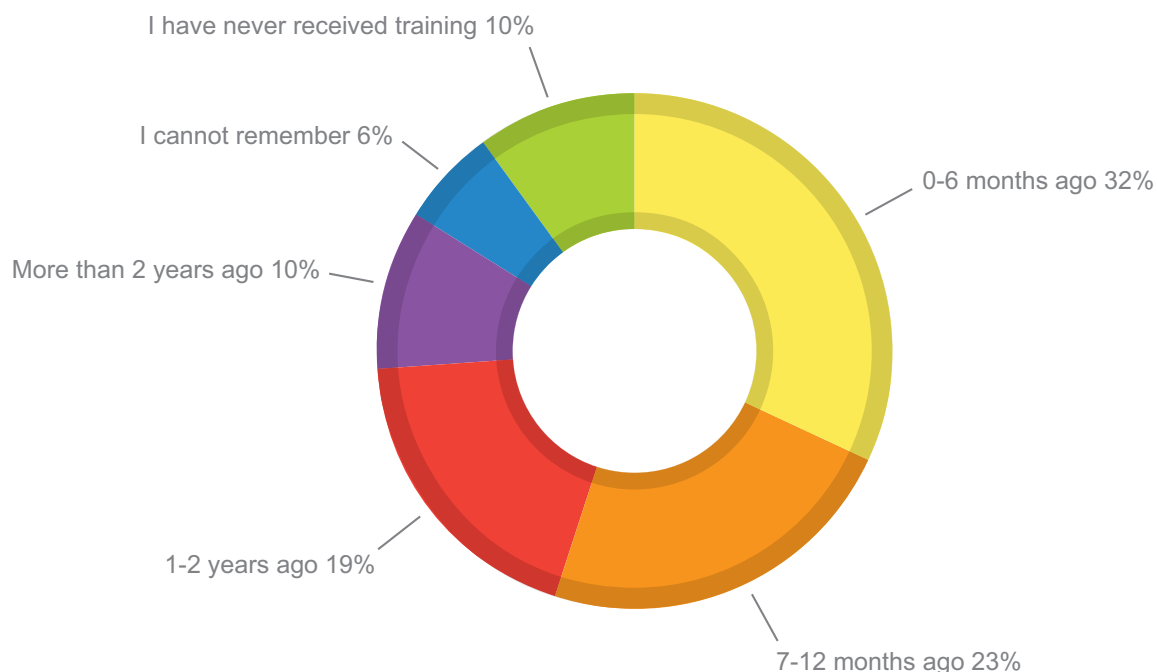


Exhibit source: Wales Audit Office Safeguarding Survey, 2013-14

2.13 A very high proportion of survey respondents, 94.4 per cent, agreed that they knew what to do if they had concerns about the safety and well-being of a child; 78.6 per cent agreed that their council was doing everything it could to minimise the risk of harm to a child; and 70 per cent agreed that their council invests sufficiently in safeguarding and protecting children and young people. However, of those survey respondents that disagreed with these statements, the majority were again operational staff in leisure, cultural and libraries services. This highlights that whilst councils are providing training on safeguarding, coverage and participation is not always extended to all relevant services and the awareness of current practice varies between services. Councils need to ensure that all those who regularly come into contact with children receive training and information on their specific safeguarding responsibilities.

- 2.14 We also identified a number of other weaknesses in respect of some councils' approaches to safeguarding training. These include:
- a training programmes restricted to core services such as education and social care but not being extended to all relevant operational service areas or not being included as standard on induction programmes;
 - b no systems or only limited systems in place to identify, track and monitor attendance on safeguarding training, and not extending existing systems to capture attendance amongst for example, elected members, schools, governors and volunteers;
 - c safeguarding training being a discretionary, rather than a mandatory, requirement which is resulting in patchy coverage and low take up;
 - d limited tailoring of safeguarding training to encourage participation from difficult-to-reach groups and members; and
 - e staff in partner organisations, who are commissioned to work for the council, not being required to undertake safeguarding training.
- 2.15 Incomplete coverage in safeguarding training programmes means that councils are not addressing weaknesses in workplace skills and supporting their staff to improve. The lack of a structured training and development programme also means that councils cannot ensure that their employees have a consistent understanding and background knowledge, which is particularly relevant in an important risk area such as safeguarding. It can also affect staff satisfaction as investment in training shows the employees that they are valued, and staff who feel appreciated and challenged through training opportunities often have more satisfaction with their jobs and what they do.

Part 3

Safeguarding arrangements are not consistently monitored and evaluated by councils as part of their corporate scrutiny, internal audit and risk management arrangements



- 3.1 A council's scrutiny committee(s) and risk management and internal audit processes can provide assurance that local arrangements are working effectively and as intended, identify areas for improvement and whether there are risks that need to be mitigated. Taken together, scrutiny, risk management and internal audit are essential and integral parts of a council's assurance framework and decision-making arrangements. They can also:
- a provide assurance that procedures and activities are tested robustly and confirm that systems are fit for purpose;
 - b ensure that a council has effective governance arrangements in place;
 - c undertake essential scrutiny and oversight of decisions, policies and services and make sure that the council is accountable to local people; and
 - d provide reassurance that the council is complying with its statutory obligations.

Limitations in the monitoring and evaluation of corporate safeguarding is weakening the role of scrutiny in challenging performance and holding decision-makers to account

- 3.2 Overview and scrutiny committees were established in Welsh and English local authorities by the **Local Government Act 2000**. They were intended as a counterweight to the new executive structures created by that act (elected mayors or leaders and cabinets). Councils operating executive arrangements are required to create an overview and scrutiny committee, which is composed of councillors who are not on the executive committee, or cabinet, of that council.
- 3.3 Overview and scrutiny committees are also able to investigate any issue that affects the local area, or the area's inhabitants, whether or not it is the direct responsibility of the council's cabinet. By law, overview and scrutiny committees must have the right to 'call-in' decisions – ie, ask the decision-maker to think again, or to refer the decision to the full council if it is believed that the decision-maker has taken a decision in contravention of the council's budget or policy framework.
- 3.4 In addition, Working Together also identifies a number of key roles for scrutiny with regard to safeguarding, including the requirement that the lead director is accountable to the chief executive and thence to the members of the authority's executive, and overview and scrutiny committees. In addition, the work of the local safeguarding children board should also be scrutinised by the local authority, usually overview and scrutiny committees, to ensure there is clear oversight of safeguarding arrangements and to challenge underperformance.
- 3.5 Our review identified some good approaches for the management of performance and we highlight these as good practice.

Ceredigion County Council

Ceredigion County Council has identified what information it needs to monitor and evaluate whether its children's safeguarding arrangements are working effectively. The council utilises a number of performance indicators to measure performance across the council. Each indicator has a baseline target and is reported and discussed internally within the relevant department and formally through standardised quarterly reporting to the Deputy Leader and the council's Head of Performance and Improvement.

Ceredigion County Council also holds quarterly plenary sessions for performance management, where cabinet, strategic directors, heads of service and the chairs of scrutiny have an opportunity to evaluate performance across the council as a whole. The council's approach to managing safeguarding performance enables any issues that need scrutiny or challenge to be identified. The performance management information is also used to inform the Overview and Scrutiny Committee's forward work programmes and this provides a forum for safeguarding performance to be robustly assessed and challenged.

Denbighshire County Council

Denbighshire County Council has clear governance and scrutiny arrangements for managing its children's safeguarding. The council has identified what information it needs to monitor and evaluate its children's safeguarding arrangements and has established a core minimum dataset to judge performance. The council also regularly monitors and reviews information on children's safeguarding performance and regularly reports to scrutiny committees, and monitors performance over time and regularly benchmarks with other councils in North Wales. The council also recognises that its performance reporting needs further development to capture a broader range of information, such as Disclosure and Barring Service (DBS) checks, and is addressing this.

Bridgend County Borough Council

The council has various systems in place to monitor, review and challenge performance, including an annual safeguarding report, which sets out wider information related to safeguarding activity, timeliness, and capacity. In addition, we found evidence of the Children and Young People Overview and Scrutiny Committee directly influencing safeguarding policies and strategies.

Wrexham County Borough Council

Key performance management information in Children's Social Care Services is regularly reported to members. Through the Local Safeguarding Children Board, the council benchmarks and assesses its performance over time, and scrutiny committees receive summary reports on performance that signpost to more detailed reports.

- 3.6 Critical to effective scrutiny is using information to support decision-makers to take informed and evidence-based policy and operational choices. From our review, we found that this is an area of work that councils have struggled with, with the focus of current data primarily looking at performance against statutory performance indicators; some data relating to service demand; and response times. Much of this information is in different places and is not analysed and reported in a way that enables effective scrutiny of all corporate safeguarding responsibilities. These limitations in information management systems consequently make it difficult for councillors, senior managers, operational staff and the public to evaluate how well the council is discharging its safeguarding responsibilities.
- 3.7 In particular, we identified some common weaknesses that undermine the role of councils' scrutiny work in providing assurance on corporate safeguarding arrangements. These include councils:
- a Not formally reporting safeguarding requirements and performance to scrutiny or cabinet on a regular basis, other than in the annual report of the director of social services.
 - b Limiting scrutiny of performance to only cover national performance indicators and other service-based performance data and not scrutinising key areas such as attendance at safeguarding training, for example.
 - c Reporting information on children's services and child protection only in relation to social care and education services, but not testing work within other services that regularly come into contact with children or that can provide assurance on the effectiveness of corporate safeguarding arrangements.
 - d Not using relevant and meaningful data to judge the quality and effectiveness of safeguarding performance arrangements; for example, compliance with, and coverage of, DBS checks.
 - e Lacking effective systems to be able to draw together performance data and having very few truly integrated information management systems which make it difficult to interrogate and scrutinise performance.
 - f Limiting analysis to focus on council-specific data and not widening out scrutiny to compare and benchmark with others.

The role of internal audit in providing assurance on the effectiveness of corporate safeguarding arrangements is limited

- 3.8 Internal audit provide a number of important services including detecting and preventing fraud, testing internal control, and monitoring compliance with council policy and government regulation. A formal internal audit plan, which includes regular examination of safeguarding policies and procedures, can also provide assurance that internal systems are efficient and are working effectively. Internal audit can therefore provide assurance that the council is complying with statutory safeguarding requirements and guidance.
- 3.9 Positively, Neath Port Talbot County Borough Council, Denbighshire County Council and Rhondda Cynon Taf have all included safeguarding and child protection issues in their internal audit plans and have subjected different elements of these arrangements to review by internal audit. The inclusion of safeguarding issues on internal audit work programmes has enabled the respective councils to provide senior managers and elected members with assurance that the council's policies and procedures are operating effectively and to identify opportunities for improvement. In addition, some councils, such as Bridgend County Borough Council, use the internal audit team to check compliance on key areas, for example, DBS checks for volunteer drivers.
- 3.10 However, most councils do not regularly include corporate safeguarding arrangements in internal audit programmes. In some councils, a conscious decision has been taken not to use internal audit because safeguarding was seen as too specialist an area of work for auditors to review, and peer review within social care and education was used to test the effectiveness of current arrangements. However, the decision not to use internal audit to undertake checks ignores their expertise in systems testing and compliance review, which are key areas of regular work for internal audit teams, and could test the effectiveness of elements of a council's corporate safeguarding responsibilities.

Council risk management processes are not always robust enough to provide assurance that corporate safeguarding responsibilities are effectively managed

- 3.11 Risk management is an important part of councils' strategic planning arrangements and, done well, can provide councils with assurance that the risk of certain kinds of events happening or having an impact on the business of the council are reduced or eliminated. Effective risk management is a process for identifying, assessing, and prioritising risks of different kinds and, once the risks are identified, creating a plan to minimise or eliminate the impact of negative events.
- 3.12 There are many different types of risk that risk management plans can help identify. Common risks include things like accidents in the workplace or legal risks like fraud, theft, or litigation under employment law. Risks can also relate to business practices, uncertainty in financial markets, failures in projects, credit risks, or the

security and storage of data and records. Risk management is also designed to protect the employees, customers, and general public from negative events that may affect them. Risk management practices are also about preserving the physical facilities, data, records, and physical assets a council owns and uses.

- 3.13 While a variety of different strategies can mitigate or eliminate risk, the process for identifying and managing the risk is fairly standard and consists of five basic steps. First, threats or risks are identified. Second, the vulnerability of key assets like information to the identified threats is assessed. Next, the expected consequences of specific threats are assessed. The last two steps in the process are to identify how to reduce risks and then prioritise the risk management procedures based on their importance. Having a risk management plan is an important part of maintaining a successful and responsible council and it will help to protect people as well as physical and financial assets.
- 3.14 We found that in many councils safeguarding is identified as a major risk that they have taken steps to manage and mitigate. For example, the City and County of Swansea Council has identified safeguarding as a key corporate risk. The annual review of its Corporate Risk Register identified a series of mitigation actions to manage this risk and these are being co-ordinated by the Corporate Safeguarding Operational Group. In addition, each service has a risk register that is reviewed on a monthly basis. Likewise, Merthyr Tydfil County Borough Council also includes safeguarding on the Corporate Risk Register, which is reviewed quarterly by officers and elected members, including scrutiny committees.
- 3.15 Pembrokeshire County Council has arrangements in place for operational and case-based risks to be considered by senior managers and for them to refer any issues arising to operational services and the Integrated Safeguarding Service for action. Any resultant learning is used to further develop and evolve processes and procedures. Pembrokeshire County Council acknowledges that potential failures in safeguarding will always present a high-level risk and that safeguarding issues will remain on the Corporate Risk Register.
- 3.16 In some councils, we were informed that safeguarding is included on corporate risk registers but there was little evidence of this. Whilst service plans use risk management approaches, we found the linking of service and corporate risk reporting was not always clear. In other councils, we found that awareness amongst managers on how risk management operates varied widely and some staff we interviewed were unclear how departmental and corporate risks were monitored and reviewed. Audit committees were not routinely referring issues arising from their reviews of the risk register for challenge by the more specialised overview and scrutiny committees. In addition, in a number of councils, safeguarding children was not identified as a specific risk for the council.

Appendices

Appendix 1 - Methodology

Appendix 2 - Checklist – key features
of effective corporate arrangements
for safeguarding



Appendix 1 - Methodology

Review of literature, data and statistics

We have reviewed a wide range of documents and media, including:

- Welsh Government policy and guidance documents; and
- relevant research and guidance from the Care and Social Services Inspectorate Wales and Estyn.

Local authority fieldwork

We visited all 22 local authorities in Wales, between December 2013 and May 2014. During the visits, we interviewed a range of local authority staff, elected members, and produced local reports for each council summarising our key findings.

Local authority surveys

We undertook a survey of local authority staff working in leisure, cultural services and libraries and education non-schools-based staff; schools-based staff; head teachers; chairs of governors; and all elected members. Identical surveys were used for each group to ensure findings could be compared. We received 1,990 responses in total: 185 from chairs of governors, 331 from elected members and 1,474 from council staff.

Appendix 2 - Checklist – key features of effective corporate arrangements for safeguarding

Corporate Assurance standard	In place	Under development	Not in place
Corporate leadership			
The council has identified a named person at senior management level to promote the importance of safeguarding and to promote the welfare of children throughout the organisation.			
The council has appointed a Lead Member for safeguarding			
The council regularly disseminates and updates information on these appointments to all staff and stakeholders			
The council regularly tests awareness and understanding of these corporate leadership roles			
Corporate policy			
There is a council wide policy on safeguarding covering all council services			
The policy is publicised, promoted and distributed widely			
The policy is reviewed every three years or whenever there is a significant change in the organisation or in relevant legislation			
The policy is approved and signed by the relevant management body (e.g. Council or the Executive)			
The policy is approved and signed by the Local Safeguarding Children's Board			
The policy covers safeguarding work in all relevant council services			
All staff, members, volunteers, partners and contractors are required to comply with the policy – there are no exceptions			
The council regularly tests awareness and understanding of the policy			

Corporate Assurance standard	In place	Under development	Not in place
Safe recruitment of staff			
Written guidance on safer recruitment practice is in place and is used to recruit and select staff			
All those who have significant contact with children complete a self-declaration about previous convictions			
The council ensures that Disclosure and Barring Service checks and compliance with safe recruitment policies cover all services that come into contact with children			
Staff who require a Disclosure and Barring Service check do not start work until this has been completed and approved			
Training and development			
Training on safer recruitment practice is in place and is used to recruit and select staff			
Safeguarding is included as standard on induction programmes			
Safeguarding training is mandated and coverage extended to all relevant council service areas			
The consequences of not complying with the councils safeguarding policy are made clear to staff and members and linked to the council's disciplinary processes			
Partners, volunteers and commissioned services			
There is a process of engagement with partners on safeguarding issues to ensure common agreements, mutual learning and development of good practice			
The council has written minimum standards for safeguarding for working with partners, volunteers and contractors			
The council requires safe recruitment practices by partners, volunteers and contractors who provide services commissioned and/or used by the council			
The council requires 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			

Corporate Assurance standard	In place	Under development	Not in place
Systems			
There is an integrated council wide system to record and monitor compliance levels on Disclosure and Barring Service checks			
The council can identify, track and monitor compliance with attendance safeguarding training in all council departments, elected members, schools, governors and volunteers			
Scrutiny and assurance			
The council regularly reports safeguarding issues and assurances to Scrutiny Committee(s) against a balanced and council wide set of performance information. This covers:			
• benchmarking and comparisons with others			
• conclusions of internal and external audit/inspection reviews			
• relevant service based performance data			
• key personnel data such as safeguarding training, and DBS recruitment checks			
• the performance of contractors, partners, volunteers and commissioned services on compliance with council safeguarding responsibilities			
Risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the council			
A rolling programme of internal audit systems testing and compliance reviews are undertaken on the councils safeguarding practices			

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