SMH Associates Limited

Independent review of Oxford City Council's Safeguarding Children - Section 11 Self-Assessment

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Acknowledgements

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1 Foreword and executive summary

1.1 SMH Associates Ltd was commissioned by the Chief Executive of Oxford City Council to undertake an independent review of Oxford City Council's *Safeguarding Children - Section 11 Self-Assessment*.

1.2 Oxford City assessed itself in December 2012 as meeting all the standards fully; a subsequent Oxfordshire Safeguarding Children Board (OSCB) peer review in March 2013 had confirmed this, and did not identify any further actions as being needed.

1.3 In the expectation of an Ofsted inspection of Oxfordshire County Council's arrangements for Looked-After Children and Child Protection, which include an inspection of multi-agency work and partnership working, the City Council wished to test that its Safeguarding Section 11 Self-Assessment was in order and robust, to ensure that it could demonstrate that this informed good practice for front line staff and service development, and to identify any potential areas of weakness and develop action plans to address them.

1.4 The team consisted of two consultants with considerable strategic and operational experience of safeguarding in the context of local authorities, one of whom is independent chair of two local safeguarding children boards (LSCBs), both of whom have significant experience in assisting councils and partners to improve services.

1.5 A variety of methods was used to gather information and opinions, which included: a review of relevant documentation and a number of semi-structured interviews with individuals and groups from the City Council, the County Council and the LSCB.

1.6 Following the initial desktop review, six broad areas of focus were identified within which the twelve section 11 standards could be grouped. Following discussion at the initial feedback meeting with the Executive Director, Community Services and the Partnership Development Manager, and further consideration of the information collected, these were later reduced to four in order to aid clarity and avoid repetition; quality assurance issues were incorporated into the section on leadership and accountability, and data and information sharing were included with policies and procedures.

1.7 The four areas of focus are:
   o Leadership and accountability
   o Partnership working
   o Safe workforce
   o Policies and procedures

1.8 The four level 'impact model' provides a framework for evaluating the different stages of development in safeguarding arrangements in Oxford City.

1.9 Oxford City shows very good evidence of changes at the first two levels, with some examples of work that is directly changing outcomes. The opportunity is to develop approaches to effective safeguarding in the community space, to complement the more usual emphasis on safeguarding of individuals in family or group settings.

1.10 Recommendations are as follows:

1. In order to strengthen leadership and accountability, the City Council should:
   - Establish a single line of accountability, supported by regular and systematic reporting, at Executive Director level;
   - Develop the leadership role of the designated officers group, to include terms of reference and a workplan which supports relevant corporate safeguarding priorities;
   - Develop engagement of members in leadership of the safeguarding agenda;
   - Establish a system of regular 'safeguarding assurance' reporting throughout the organisation, including at member and executive director level.

2. In order to strengthen partnership working, the City Council should:
   - Initiate discussion with Oxfordshire Safeguarding Children Board and the County Council about alignment of its services with the EI hubs across the City;
   - Review referral processes to ensure that all staff are aware of current procedures and thresholds for services;
   - Establish clear expectations regarding the initiation and completion of common assessments; and
   - Use the Safe Network core safeguarding standards as the basis for work with OCVA and OAYP in further supporting voluntary sector partners to develop their safeguarding arrangements.

3. In order to strengthen the safety of its workforce, the City Council should:
   - Build on established good practice to integrate safeguarding fully into HR processes such as induction, appraisal and supervision, across the council;
   - Develop, with the assistance of OSCB, a range of methods for assessing and demonstrating the impact of training on safeguarding practice;

- With the assistance of the County Council LADO, review and strengthen the current policy, procedures and approach to raising concerns and managing allegations against staff and volunteers.

4. In order to improve the effectiveness and impact of its *Safeguarding Children, Young People and Vulnerable Adult Policy,* the City Council should:
    - Review its approach to recording concerns and making referrals, with a view to using a single, streamlined system;
    - Develop and promote a reliable, well understood system for collating referrals to the County, which is regularly reviewed and reported on;
    - Refresh the information sharing protocols within the City Council itself, and with the County Council and OSCB;
    - Develop a range of methods for monitoring the impact of its policy, procedures and safeguarding activity across its own services and those it commissions.

2 Introduction: what we were asked to do

2.1 Oxford City Council operates within a two tier environment. Oxfordshire County Council is the top tier authority with responsibility for looked after children and child protection.

2.2 In the expectation of an Ofsted inspection of Oxfordshire County Council's arrangements for looked after children and child protection services, which will include an inspection of multi-agency work and partnership working, the City Council wished to test that its Safeguarding Section 11 Self-Assessment is in order and robust, to ensure that it can demonstrate that this informs good practice for front line staff and service development, and to identify any potential areas of weakness and develop action plans to address them.

2.3 The City Council has a Section 11 Self –Assessment and Action Plan which was reviewed in detail and submitted to Oxfordshire LSCB in December 2012. The LSCB conducted a peer review on 1st March 2013 for QA purposes and informal feedback was that the City Council has effective policies and procedures in place. No further actions were identified as being necessary. However, the council decided to seek independent and specialist advice to ensure that it is working to best practice and that this is embedded throughout the organisation. Key outcomes of the independent review are set out in Appendix 4.

2.4 The City Council provided excellent support for the work, both before and during the time 'on site'. This included providing administrative support for arranging interviews and meeting rooms, and providing relevant background information and reports.

Legislative context

2.5 Section 11 of the Children Act 2004 places duties on a range of organisations 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.

2.6 Working Together 2013 (the statutory guidance) elaborates further:

Organisations should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including:

- *a clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children;*

- *a senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements;*

- *a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services;*

- *arrangements which set out clearly the processes for sharing information, with other professionals and with the Local Safeguarding Children Board (LSCB);*

- *a designated professional lead (or, for health provider organisations, named professionals) for safeguarding. Their role is to support other professionals in their agencies to recognise the needs of children, including rescue from possible abuse or neglect. Designated professional roles should always be explicitly defined in job descriptions. Professionals should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively;*

- *safe recruitment practices for individuals whom the organisation will permit to work regularly with children, including policies on when to obtain a criminal record check;*

- *appropriate supervision and support for staff, including undertaking safeguarding training:*
    - *employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;*
    - *staff should be given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare;*
    - *and all professionals should have regular reviews of their own practice to ensure they improve over time.*

  - *clear policies in line with those from the LSCB for dealing with allegations against people who work with children. An allegation may relate to a person who works with children who has:*
    - *behaved in a way that has harmed a child, or may have harmed a child;*
    - *possibly committed a criminal offence against or related to a child; or*
    - *behaved towards a child or children in a way that indicates they may pose a risk of harm to children.*

2.7 The LSCB is responsible for evaluating the degree to which each LSCB partner organisation fulfils their responsibilities under section 11. Oxfordshire LSCB (OSCB) uses twelve standards, which are set out in Appendix 2.

3 Review methods: what we did

3.1 The purpose of the review was to provide assurance that Oxford City Council's safeguarding arrangements are robust, fit for purpose, meeting statutory requirements and regulatory expectations, and that practice in selected service areas is operating to the highest standards.

3.2 This included consideration of:

1) The council's vision and leadership in relation to safeguarding;

2) The clarity and effectiveness of governance, accountability, quality assurance and performance management arrangements;

3) The degree to which service developments demonstrate awareness of and priorities for improving safeguarding;

4) The safety, effectiveness and impact of policies, procedures and service delivery;

5) The quality and impact of staff training and development in relation to safeguarding;

6) The safety of the council's recruitment arrangements;

7) Assessment of the council's contribution to partnership working, including in relation to care and support plans for individual children;

8) Evidence of seeking and responding to the views of children and young people.

Appendix 3 gives full details.

3.3 The review commenced 30th September 2013, with a preliminary desktop review of relevant documents. Following the initial desktop review, six broad areas of focus were identified within which the twelve section 11 standards could be grouped. Following discussion at the initial feedback meeting with the Executive Director, Community Services and the Partnership Development Manager, and further consideration of the information collected, these were later reduced to four in order to aid clarity and avoid repetition; quality assurance issues were incorporated into the section on leadership and accountability, and data and information sharing were included with policies and procedures.
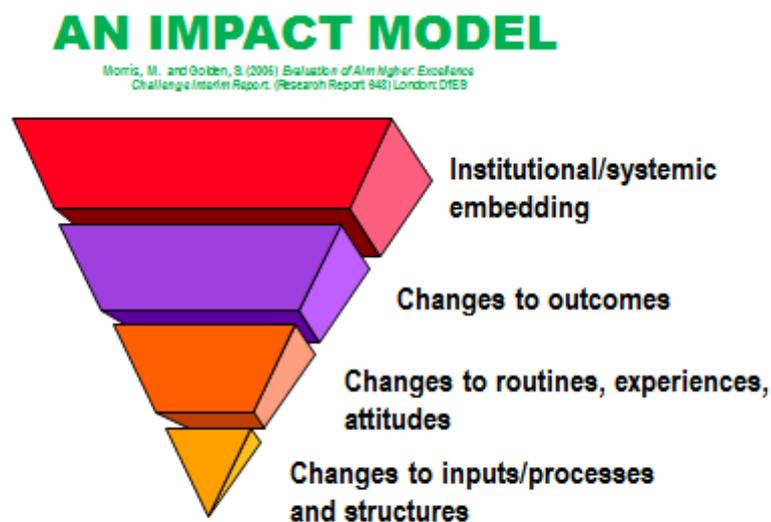
3.4 The four areas of focus are:
   – Leadership and accountability
   – Partnership working
   – Safe workforce
   – Policies and procedures

3.5   Interviews and focus groups with key individuals from Oxford City Council, Oxfordshire County Council, and the LSCB were primarily conducted in Oxford on 7th and 8th October. Details are given in Appendix 1.

3.6   Two interviews (with the LSCB and the LADO) were conducted by telephone in advance of the work in site.

3.7   The reviewers adopted the following model to assist in demonstrating the progress of the City Council in meeting its section 11 responsibilities and distance still to travel.

The Impact Model

This four-stage model of impact suggests different levels of impact over time and provides a framework for evaluating the different stages of development in safeguarding arrangements in Oxford City. The four levels are not linear stages and it is not necessary to go through the stages in sequence.

AN IMPACT MODEL

Morris, M. and Golden, S. (2005) Evaluation of Aim higher: Excellence Challenge Interim Report. (Research Report 648) London: DfES

- Institutional/systemic embedding
- Changes to outcomes
- Changes to routines, experiences, attitudes
- Changes to inputs/processes and structures

Level 1 impacts relate to changes to inputs (such as the introduction of tools and frameworks), to processes (such as the type of service offered, e.g. earlier intervention) and to service and management structures.

Level 2 impacts involve changes to the experiences and attitudes of the key players within the services involved, i.e. practitioners and service managers.

Level 3 impacts change outcomes for the target population, i.e. children, young people and families.

Level 4 impacts are the result of longer-term, more stable and embedded changes to the infrastructure, systems and processes within services, as well as more widespread sharing of practices and ideas.

3.8 Some organisations are able to show an impact on outcomes and to do some more rapidly than others because of approaches to leadership.

3.9 The reviewers were unable to examine a sample of case files, as originally had been planned, due to concerns within the City Council regarding Data Protection and the absence of any understood process or criteria. This has meant that the reviewers therefore cannot comment first-hand on the impact of work by the council to safeguard individual vulnerable children or young adults, nor assess to what extent individual work takes into account their wishes and feelings. It is understood that this is an area of practice that will be developed.

4 What we found

4.1 Leadership and accountability

Strengths

4.1.1 There is clear ambition from the top of the organisation to improving outcomes for vulnerable children and families. This is reflected in key strategies and plans, such as the City Council's Corporate Plan and Children and Young people's Plan, and translates into specific programmes and initiatives.

4.1.2 There has been a Lead Member for safeguarding at Cabinet level for some time; the recently appointed Lead Member is keen to develop the role further.

4.1.3 The Chief Executive regularly seeks feedback from across the wider partnerships on the performance and contribution of the City Council to safeguarding arrangements.

4.1.4 Leadership by the Policy and Partnerships Manager is proactive and thoughtful and has resulted in systems and procedures across the council that are well established and understood, with attention to detail evident throughout.

4.1.5 Interviews with Heads of Service and Designated Officers demonstrate that they are clear about their roles and are able to give a number of examples of how they carry out their responsibilities.

4.1.6 Each service area has a 'named officer' for safeguarding. These meet together with the four designated officers every 6 months to share information and discuss relevant matters arising.

4.1.7 The Council's overall contribution to safeguarding children and to the LSCB in particular, is well regarded by LSCB. The City models leadership in demonstrating how safeguarding operates in a District Council context.

Areas for development

4.1.8 At present, leadership for the safeguarding children agenda is held outside the corporate leadership team (CMT). Four officers are named as designated officers, three of whom are service heads. The fourth – the Partnership Development Manager - is the most active and is regarded by managers and staff across the council and in the wider partnership arena as 'first among equals' – "*all roads lead to Val*." However, safeguarding is only one part of her role.

4.1.9 Whilst there is an assumption that corporate leadership of safeguarding rests with the Executive Director, Community Services, this is not explicit and he is not held to account for this areas of accountability. The Executive and CMT do not receive systematic reports on safeguarding.

4.1.10 The group of four designated officers does not appear to have any formal role, other than meeting to co-ordinate the City Council's section 11 return to the LSCB. They do not have any formal terms of reference and do not meet as a group to consider progress/areas for development, for example, nor provide regular reports to the corporate management team (CMT). Where reports relevant to safeguarding are presented to CMT, the Partnership Development Manager does, however, attend.

4.1.11 The wider group of named leads is a potentially invaluable resource but does not appear to have a direct relationship with this group of four, nor clear terms of reference. This is a missed opportunity.

4.1.12 The council's current arrangements are probably not sustainable unless more distributed leadership is established, together with clear accountability to the Chief Executive and members. This will develop capacity and sustainability, as well as promoting engagement of the corporate leadership, including members, who are well placed to provide local leadership of the safeguarding agenda through their community based roles e.g. as trustees of community groups.

4.1.13 In relation to the Impact Model, the City Council is operating at level 2 in this area of its work.

Recommendation 1

In order to strengthen leadership and accountability, the City Council should:

- Establish a single line of accountability, supported by regular and systematic reporting, at Executive Director level;
- Develop the leadership role of the designated officers group, to include terms of reference and a workplan which supports relevant corporate safeguarding priorities;
- Develop engagement of members in leadership of the safeguarding agenda;
- Establish a system of regular 'safeguarding assurance' reporting throughout the organisation, including at member and executive director level.

4.2 Partnership working

Strengths

4.2.1 The City Council participates in a range of partnerships across Oxfordshire (LSCB, Health and Wellbeing Board, Community Safety, Children's Partnership) which have an impact on the safety and wellbeing of children, young people and their families.

4.2.2 The contribution of the City Council to the OSCB is highly valued, and the City clearly works hard with its District Council colleagues to improve safeguarding awareness and arrangements across Oxfordshire. The recent and reportedly very well attended conference for housing officers and social landlords is a good example of the City's proactive approach in this area.

4.2.3 The City Council is promoting safeguarding in the community through the work of the Anti-Social Behaviour (ASB) Investigation Team, Community Response Team, Licensing, and contributing to Community Safety partnership work on tackling domestic violence. There is good joint working across these teams, for example between ASB and the Tenancy Sustainment teams which work together to reduce the risk of homelessness.

4.2.4 The Council reaches into many diverse communities across the City, and is well placed to identify issues particular to those communities. Staff spoken with referred to specific awareness, for example in relation to honour-based violence, which is evidence that the city council addresses issues of diversity in their work to safeguard children and young people (standard 9).

4.2.5 Numerous examples of partnership working with key organisations, such as the police and children's social care, are evident. The City's work on tackling human exploitation (CSE) has informed county-wide training and development, and the council is contributing a member of staff to the multi-agency Kingfisher Team, as well as trainers in CSE to the LSCB's training 'pool'.

4.2.6 A range of programmes and services have been established in key areas of the council's responsibilities, such as 'Positive Futures' and the Breaking the Cycle of Deprivation Programme which contribute to the support available to vulnerable young people and families and could form part of a coherent early help offer in the city.

4.2.7 There are examples of the effective integration of safeguarding requirements across service areas, such as in the contracting and procurement of services, the delivery of grants and the arrangements for management of community centres.

4.2.8 At an individual level, the County Council Children's Services report receiving regular and appropriate referrals for its social care services from across the City Council. It was not possible to assess as part of this review, through examination of case files, whether all concerns recorded and referrals made were consistent with the OSCB threshold document.

4.2.9 City staff spoken with report that they are aware of how and when to make a referral and this is confirmed within written procedures.

4.2.10 The City has put in place a system of notifying the Corporate Secretariat Manager each time a referral is made. This consists of a copy of the referral. The Corporate Secretariat Manager is also the City's FOI officer, which means he is particularly mindful of the appropriate retaining of personal information.

4.2.11 The Corporate Secretariat Manager also acts as the point of contact for the OSCB in the event of a Serious Case Review (SCR) being initiated: he will collate any information held within the City and write the Individual Management Review (IMR) if one is needed. This brings useful clarity for the OSCB.

Areas for development

4.2.12 At present the links to the County Council's developing early intervention (EI) hubs are not fully developed and some of the City's services may need assistance in understanding their potential role as part of a coherent approach to child and family support. The review of the EI hubs by Oxfordshire provides an opportunity to integrate the city's programmes more effectively, thus ensuring a better match to local need as part of a 'child's journey' framework.

4.2.13 The system for notifying the Corporate Secretariat Manager of all referrals made in respect of any children or families is not universally known or complied with, which means that there is a risk that he (and therefore the City Council as a whole) does not have a complete overview of referrals made, nor cases engaged with. The City Council is therefore reliant on feedback from the County Council about the levels of involvement of its staff.

4.2.14 At present, despite assumptions made to the contrary, nothing is done with the stored referrals: they are not reviewed, collated or reported, which is a lost opportunity for learning about the safety and effectiveness of the whole system and also for assessing whether referrals made are appropriate. This could be simply rectified by initiating a regular overview report by the Corporate Secretariat Manager to the Safeguarding Lead Officer Group or the corporate safeguarding lead.

4.2.15 This issue will become more important as the early help arrangements across Oxfordshire develop, as there are likely to be increased expectations that the City plays a full part by initiating and completing common assessments. At present, City staff appear to refer everything to the County for response, which appears to be consistent with current expectations of OSCB and the County Council.

4.2.16 The City already supports a range of voluntary sector partners to develop their safeguarding arrangements, with the assistance of their umbrella organisations. This is primarily aimed at ensuring that key policies and procedures are in place. This could be enhanced by use of the Safe Network core safeguarding standards (nationally recognised safeguarding standards for voluntary and community organisations working with children and young people), accompanied by the development of 'model' policies, in order to provide a coherent and consistent approach which is more outcome focused and which could then be monitored on the council's behalf by OCVA and OAYP.

4.2.17 In relation to the Impact Model, the City Council is consistently operating at level 2 in this area of its work, with clear evidence that it is achieving level 3 in key areas and impacting on outcomes for vulnerable individuals and groups.

Recommendation 2

In order to strengthen partnership working, the City Council should:

- initiate discussion with OSCB and the County Council about alignment of its services with the EI hubs across the City;
- review referral processes to ensure that all staff are aware of current procedures and thresholds for services;
- establish clear expectations regarding the initiation and completion of common assessments; and
- use the Safe Network core safeguarding standards as the basis for work with OCVA and OAYP in further supporting voluntary sector partners to develop their safeguarding arrangements.

4.3 Safe workforce

Strengths

4.3.1 The City has been proactive in seeking to assure itself that it has a safe workforce which is knowledgeable and alert to safeguarding issues. The City's *Safeguarding Children and Vulnerable Adults Policy* sets out clear expectations with respect to recruitment, criminal record checks, disclosure and barring. Recruitment processes appear to comply with statutory and good practice requirements; careful attention has been given to assessing need of each post for CRB/DBS checking, and matching posts with an appropriate level of training; some parts of the council have integrated safeguarding into core processes such as induction, appraisal and supervision.

4.3.2 The approach to training delivery is comprehensive, using a combination of internally commissioned and externally (OSCB) provided training which is delivered online as well as through face to face sessions. This has included staff who would not normally have access to safeguarding training e.g. those working for Direct Services, and has been as a direct result of learning from serious case reviews and serious incidents. Staff within the Council (particularly from the youth and leisure services) deliver specialist training in child sexual exploitation. The City Council has invested in extending its ICT capacity to record training. This will enable the maintenance of a comprehensive oversight of training participation in partnership with the OSCB.

4.3.3 The City Council appears to make particularly good use of the training available through the OSCB, which represents a good return on its contribution to the resources of the Board.

4.3.4 The Head of Human resources and Facilities is the Local Authority Designated Officer (LADO), with responsibility for oversight of allegations.

Areas for development

4.3.5 There has only been one incident reported by the City Council to the LADO in the County Council during the past year, and an additional one from an organisation which it commissions to provide services on its behalf (of which the City's LADO was unaware). Whilst this could mean that the paid and voluntary workforce across the City Council and its commissioned partners is totally safe, given the size of the workforce and the range of services provided – which includes areas of activity where allegations might be expected, such as leisure services - this would appear to be somewhat low.

4.3.6 There also appears to be low awareness amongst staff of when and how to act on a concern about a colleague, although this subject is included within the council's *Safeguarding Children, Young People and Vulnerable Adult Policy*.

4.3.7 This combination of low reporting and low awareness might indicate an area of potential risk where a more proactive approach would be beneficial. The City Council LADO could usefully seek advice and assistance from the County Council LADO in promoting this area and assuring safety.

4.3.8 Whilst training delivery is comprehensive and the City will soon be in a position to monitor take up of training across its entire workforce, there is not yet a system in place which demonstrates impact of training on practice.

4.3.9 Consideration could usefully be given to including members in safeguarding awareness training, in order to support them in their role as community leaders. At present, the lead member is the only recipient of safeguarding training and is of the view that safeguarding training for members should be mandatory.

4.3.10 In relation to the Impact Model, the City Council is operating at level 2 in this area of its work.

Recommendation 3

In order to strengthen the safety of its workforce, the City Council should:
- Build on established good practice to integrate safeguarding fully into HR processes such as induction, appraisal and supervision, across the council;
- Develop, with the assistance of OSCB, a range of methods for assessing and demonstrating the impact of training on safeguarding practice;
- With the assistance of the County Council LADO, review and strengthen the current policy, procedures and approach to raising concerns and managing allegations against staff and volunteers.

4.4 Policies and procedures

Strengths

4.4.1 The City has a range of policies and procedures in place which relate to safeguarding children. The *Safeguarding Children, Young People and Vulnerable Adult Policy* provides a comprehensive overview and appears to align with relevant policies of the OSCB.   The policy is regularly reviewed and is accessible to all staff on the *Keeping People Safe* page of the council's Intranet, along with a range of other useful documentation. It makes explicit the roles and responsibilities of the designated and lead safeguarding officers, and other relevant staff members.

4.4.2 The Policy does refer to aspects of safe working practices, and the importance of maintaining a safe working environment. Staff in Leisure Services referred to a policy on Lone Working being in place, but it is unclear whether this is incorporated under another name in the overarching *Safeguarding Children, Young People and Vulnerable Adult Policy*.

4.4.3 The policy includes a section on allegations of abuse by a third party made to a member of staff or involving a council employee or volunteer.

4.4.4 The Council works with voluntary sector partners and contractors to ensure that they have suitable child protection policies in place, for example through the arrangements for management of its community centres, and Locality Managers monitor compliance.

4.4.5 The Council works within the OSCB policy on information sharing and this is clearly signposted on the Intranet page. The Safeguarding Children, Young People and Vulnerable Adult Policy contains model forms for reporting concerns about children, young people and families.

4.4.6 There are good examples of City staff raising and acting on concerns about individuals, and being given feedback.

4.4.7 Some proactive work is taking place in some service areas, notably Direct Services, on collating and maintaining data and information, with the intention of increasing the ability to notice if there are patterns of issues arising which could point to safeguarding matters which need addressing. This has particularly resulted from the self-examination which has arisen as a natural consequence of Operation Bullfinch.

Areas for development

4.4.8 Interviews with people at all levels indicated only limited quality assurance arrangements and evaluation of impact of the City's safeguarding policies, procedures and activity. This is a key area for development.

4.4.9 The *Safeguarding Children, Young People and Vulnerable Adult* Policy and related policies and procedures should be clearly linked to the policies and procedures of the OSCB. At present, the policy does not make this explicit. The OSCB website contains a number of model policies: it may be simpler to use these as appropriate or provide direct links where relevant, particularly the model policy regarding allegations against staff and volunteers.

4.4.10 The Council's *Safeguarding Children, Young People and Vulnerable Adult Policy* contains three *Raising Concerns* forms, each to be completed by a different person. It appears from the policy that these forms should be completed in respect of every child, young person or family about whom there is a concern but who is not the subject of a referral to Children's Social Care: the choice appears to be left to the person with the concern. We were informed that different service areas have developed different forms. The council's policy states that the completed *Raising Concerns* form should ultimately be passed to the Corporate Secretariat Manager, who simply stores it. This process is neither understood nor followed systematically and would benefit from review and clarification.

4.4.11 There are a number of systems in place across services where low level concerns about individuals are recorded, reported and collated: this activity needs a more precise specification about purpose, type of information collected, how and with whom it is shared.

4.4.12 There is an appetite for developing a major system across the City Council for collecting and collating concerns. This may be a risky way forward without careful specification: at an individual level, it has the potential to build in delay to ensuring an appropriate response to a concern; at a wider level, it would need considerable resource to oversee and cross reference all information to discern the existence of any patterns of risk.

4.4.13 With the development of a coherent approach to early help across the OSCB partnership, there is an opportunity to review current arrangements for sharing low level concerns about individuals and families in a consistent way that does not build in delay in identifying and meeting need.

4.4.14 Where the City Council has a significant and distinct role to play is in the collation of data and intelligence to assist the promotion of safety in the more 'public space'. Operation Bullfinch highlighted the fact that much risky activity was taking place within areas that are accessible to and overseen by City Council services, such as parks, licensed premises, taxis, streets. There is a real opportunity for the City to define the kind of data and intelligence that it can uniquely contribute to enable the intelligent identification of risk.

4.4.15 In relation to the Impact Model, the City Council is operating at level 2 in this area of its work.

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Recommendation 4

In order to improve the effectiveness and impact of its *Safeguarding Children, Young People and Vulnerable Adult Policy,* the City Council should:
- Review its approach to recording concerns and making referrals, with a view to using a single, streamlined system;
- Develop and promote a reliable, well understood system for collating referrals to the County, which is regularly reviewed and reported on;
- Refresh the information sharing protocols within the City Council itself, and with the County Council and OSCB;
- Develop a range of methods for monitoring the impact of its policy, procedures and safeguarding activity across its own services and those it commissions.

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5   Conclusions and recommended actions

5.1   The City Council has established a strong foundation for promoting the safeguarding agenda across its workforce, primarily focused on managing risk in respect of individual cases. Its section 11 self-assessment is sound, and reflects an accurate picture of the present position regarding its safeguarding development.

5.2   In relation to the Impact Model, the City has successfully implemented changes at level 1 and 2, being imaginative and ambitious in extending the reach of its safeguarding policy and developing the understanding of a huge number of staff. In areas of its partnership working the council has clear evidence that it is achieving level 3 and having a measurable impact on outcomes for some vulnerable individuals and groups.

5.3   The next step is for the council to develop a range of methods for assessing the impact of its activity on outcomes for individuals and groups to whom it provides services, and also to assess to what degree its approaches are becoming embedded across its workforce.

5.4   There is also an opportunity to develop a uniquely 'tier 2 council' agenda in relation to safeguarding in the public sphere, building on the experience and understanding deriving from Operation Bullfinch and the increasing understanding of 'modern slavery.'

5.5   Recommended actions to strengthen the breadth and depth of the City Council's response to its section 11 responsibilities are as follows:

1. In order to strengthen leadership and accountability, the City Council should:
    − Establish a single line of accountability, supported by regular and systematic reporting, at Executive Director level;
    − Develop the leadership role of the designated officers group, to include terms of reference and a workplan which supports relevant corporate safeguarding priorities;
    − Develop engagement of members in leadership of the safeguarding agenda;
    − Establish a system of regular 'safeguarding assurance' reporting throughout the organisation, including at member and executive director level.

2. In order to strengthen partnership working, the City Council should:
    − Initiate discussion with OSCB and the County Council about alignment of its services with the EI hubs across the City;
    − Review referral processes to ensure that all staff are aware of current procedures and thresholds for services;

- Establish clear expectations regarding the initiation and completion of common assessments; and
- Use the Safe Network core safeguarding standards as the basis for work with OCVA and OAYP in further supporting voluntary sector partners to develop their safeguarding arrangements.

3. In order to strengthen the safety of its workforce, the City Council should:
   - Build on established good practice to integrate safeguarding fully into HR processes such as induction, appraisal and supervision, across the council;
   - Develop, with the assistance of OSCB, a range of methods for assessing and demonstrating the impact of training on safeguarding practice;
   - With the assistance of the County Council LADO, review and strengthen the current policy, procedures and approach to raising concerns and managing allegations against staff and volunteers.

4. In order to improve the effectiveness and impact of its *Safeguarding Children, Young People and Vulnerable Adult Policy,* the City Council should:
   - Review its approach to recording concerns and making referrals, with a view to using a single, streamlined system;
   - Develop and promote a reliable, well understood system for collating referrals to the County, which is regularly reviewed and reported on;
   - Refresh the information sharing protocols within the City Council itself, and with the County Council and OSCB;
   - Develop a range of methods for monitoring the impact of its policy, procedures and safeguarding activity across its own services and those it commissions.

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Appendix 1: Interviews and focus groups

Oxford City Council	
Chief Executive	Interview
Executive Board Member for Safeguarding of Children	Interview
Director Community Services	Interview
Head of Housing	Interview
Head of Human Resources	Interview
Corporate Secretariat Manager	Interview
Environmental Protection Services Manager	Interview
Team Manager , Policy and Partnerships	Interview
Team Manager, Communities and Neighbourhoods	Interview
Housing Sustainability Team members	Focus group
Leisure Services, including Positive Futures and Youth Engagement	Focus group
Anti-Social Behaviour Team	Focus group
Key staff: *Leisure Services,* *Drug & Human Exploitation Coordinator* *Domestic & Sexual Abuse Coordinator* *HR Policy Advisor* *Housing Options Officer* *Head of Service(Environmental Development)* *Senior Support Officer, Direct Services* *Housing Options Manager*	Focus group
Oxfordshire County Council	
Barry Armstrong LADO	Interview
Area Manager, Children and Young People Central Assessment Team, City Safeguarding Group	Interview
Oxfordshire LSCB	
Independent Chair	Interview
Business Manager	Interview
Training Officer	Interview

Appendix 2: Oxfordshire LSCB Section 11 standards

Standard 1 - Senior management commitment to the importance of safeguarding and promoting children and young people's welfare.

Standard 2 - A clear statement of the agency's responsibilities towards children and young people is available for all staff.

Standard 3 - Partner organisations/ services have an accountability structure for work to safeguard and promote the welfare of children and young people.

Standard 4 - All organisations ensure service development takes account of the need to safeguard and promote the welfare of children and young people.

Standard 5 - All partner organisations will ensure personnel are trained in safeguarding and promoting the welfare of children and young people.

Standard 6 - All partners will ensure that all staff with access to children and young people are properly selected and vetted to ensure inappropriate individuals do not gain access to children and young people.

Standard 7 - Organisations will contribute to effective interagency working to safeguard children and young people.

Standard 8 - Partner organizations will have arrangements for effective information sharing.

Standard 9 - All partner organizations address issues of diversity in their work to safeguard children and young people.

Standard 10 - All partner organizations will work closely and effectively through agreed mechanisms to monitor performance in safeguarding and promoting the welfare of children and young people and evaluate effectiveness of the standards.

Standard 11 - All partners have written procedures for handling complaints and allegations against staff.

Standard 12 - All partner agencies have processes and procedures in place so a safe working environment is created and maintained.

Appendix 3: Key outcomes of independent review

The key outcomes for this piece of work were specified as follows:

- Ensure that the City Council is clear about its safeguarding children and young people, duties and responsibilities, as a second tier authority.

- Ensure the robustness of the City Council Section 11 Self –Assessment, including that there is:
  - Effective leadership and management around safeguarding
  - A clear statement of responsibilities is in place. An effective contribution from City staff to improving outcomes for individual children/ families where their services are involved with children in need of protection or looked after children
  - Service development that takes into account safeguarding requirements and the welfare of children.
  - Adequate training provision is in place and taken up.
  - Recruitment and selection procedures are compliant, appropriate checks are carried on staff and there are arrangements to move to the new scheme.
  - Effective interagency working and that information sharing protocols are in place and being used properly so that children are safeguarded.
  - Data storage and retrieval is effective and compliant with Data Protection law (Serious Case Review requests)
  - Issues of diversity are being effectively addressed
  - Allegations against staff are effectively dealt with.

- Effective monitoring procedures are in place to ensure the Section 11 Self-Assessment and Action Plan is implemented effectively.

- To ensure that the process is informing front line staff on good practice, in terms of reporting and recording concerns.

In the process of preliminary discussion between consultants and the Partnership Development Manager, the following additional lines of enquiry were specified:

- Are the policy and procedures fit for purpose? Could they be simplified?
- We currently have 4 Nominated Officers with clear responsibilities – but does this work effectively?
- The Named Safeguarding Officers Group- should we review the role and responsibilities of this group?
- Identified training needs, take up of training and the development of the safeguarding training programme.
- Ensuring that we are making effective referrals and working well with other agencies.

- Ensuring that we have an effective overview of concerns raised, participation in case conferences and serious case reviews.
- To provide a view as to VFM received from the City Council Annual Subscription to the Oxfordshire Safeguarding Children Board.