

No.	Finding / Associated Risk	Priority	Recommendation	Management Response	Target Date
1.	<p>Safeguarding Training</p> <p>We reviewed the safeguarding training completed for a sample of officers by reviewing the Councils safeguarding training tracker. The sample included a mix of officers requiring different levels of training. This included basic and advanced safeguarding training as well as E-Learning. The latter was limited to a sample of new starters from the 2022/23 financial year, due to the safeguarding team recently incorporating monitoring of this training completion into the training tracker. From the 13 officers we sampled, the following findings were noted:</p> <p><u>Incomplete Training:</u></p> <ul style="list-style-type: none"> • Three officers were assessed as requiring basic adult and child safeguarding training courses however, they had not completed one or both courses since starting employment at the Council. The start dates of the officers were 30/06/19, 29/03/21 and 23/08/21. It is acknowledged that actions have been taken by the current safeguarding team to try and schedule courses for these officers. Three of the five outstanding courses were yet to be scheduled at the time of testing. • A casual Careline Operator who started employment on 22/08/22 has not completed 	Medium	<p>We recommend:</p> <ol style="list-style-type: none"> 1. Where officers have outstanding or overdue safeguarding training, the safeguarding team continues to work with these officers to schedule the outstanding training as a matter of priority. 2. For the Casual Careline Operator mentioned, they must undertake the same level of safeguarding training which has been assessed as required by other Careline Operators (this was the basic adult and child safeguarding training at the time of testing). 3. The Council reviews 	<p>Responsible Officer:</p> <ol style="list-style-type: none"> 1. The member of staff/ their line manager/ follow up by the Safeguarding Team. If they have failed to attend an organised Basic or Advanced level training course, then should (if reasonably practical) undertake the Introductory E-learning within a week. 2. The Careline staff, their line Manager and the Service Director: Customers to ensure undertaken. Introductory e-learning within the week and then to attend the next basic course arranged. 	<ol style="list-style-type: none"> 1. Start by end June 23, once staff and their line managers aware. 2. 31 December 2023 for ECP Training 3. N/A.

	<p>the basic adult and child safeguarding courses. It is our understanding that Careline Operators would as a minimum be required to undertake both these basic safeguarding courses.</p> <ul style="list-style-type: none"> An officer’s basic child safeguarding training expired in June 2022 and at the time of testing (April 2023) had yet to be renewed. We acknowledge actions had been taken by the current safeguarding team to book a training course for renewal. <p><u>Timeliness of Training Completion</u></p> <p>We understand the Council aims to schedule basic and advanced safeguarding courses within three months of an officers start date. We noted for some of the officers we sample tested, that they attended training courses after three months. This includes:</p> <ul style="list-style-type: none"> An officer attending basic safeguarding courses 14 and 15 months after their employment start date. An officer attending basic safeguarding courses 6 and 11 months after their employment start date. Two officers scheduled to attend an advanced safeguarding course 5 months after their employment start date. It is acknowledged these officers are the members of the newly formed safeguarding team. 		<p>whether:</p> <ul style="list-style-type: none"> The current aim of scheduling basic or advanced safeguarding training for completion within three months is timely or whether this needs to be shortened. E-Learning training is sufficient in the interim time where officers are waiting to receive basic or advanced safeguarding training. <p>4. Backing evidence must be adequately retained to demonstrate officers have attended/completed safeguarding training courses.</p> <p>5. Officers assessed as requiring only E-Learning safeguarding training, must renew this training on a scheduled basis (e.g., every two years).</p>	<p>3. Reviewed and considered to be sufficient, as the courses are run every month and should be undertaken within the probation period of up to 6 months. No further action required.</p> <p>All new staff will undertake e-learning within the week, and those who just have to undertake this level of training, every 3 years.</p> <p>4. The Safeguarding team already do this, so N/A.</p> <p>5. Agreed, albeit every 3 years.</p>	<p>4. N/A.</p> <p>5. Start implementation from July 2023.</p>
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<p>We were unable to obtain confirmation of the reasons for some of the delays mentioned above (first two bullet points), due to these pre-dating the current safeguarding team and therefore inhibiting the audit trails available.</p> <p>We were assured that where safeguarding courses cannot be provided in a timely manner, the safeguarding e-Learning module is instead issued to officers for completion. For three of the four officers, the training tracker shows they have completed the E-Learning training. For the remaining officer the date of completion was not logged on the training tracker. We understand that the safeguarding team feel the E-learning is sufficient to cover officers until they attend basic or advanced safeguarding courses. However, as the E-Learning is an introductory module, this may not be sufficient for officers who have roles/responsibilities requiring basic or advanced safeguarding courses.</p> <p><u>Evidence of Training Completion:</u> During testing, we requested to see backing evidence to confirm officers had attended/completed the basic or advanced safeguarding training courses held in person.</p> <p>For three officers, backing evidence could not be located to demonstrate attendance at either one or both basic safeguarding courses and for one officer no evidence could be located to demonstrate attendance to an advanced child safeguarding course.</p>				
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	<p><u>E-Learning Training</u></p> <p>From discussions with key officers, it is understood that the E-Learning safeguarding course is not required to be renewed. This means that officers who are assessed as only requiring the E-Learning safeguarding training, do not need to undertake any safeguarding training renewal. As all officers have a responsibility for safeguarding, a recommendation has been raised requiring these officers to renew their safeguarding training on a scheduled basis.</p> <p><u>Associated Risk</u></p> <p>Officers do not undertake an adequate level of safeguarding training for their job role. This could lead to officers not identifying potential safeguarding concerns or not taking appropriate action. This could result in harm to the persons affected and damage to the Councils reputation.</p>				
2.	<p>Councillor/Member Safeguarding Training</p> <p>From discussions with key officers, we found that Councillor uptake of safeguarding training was as follows:</p> <ul style="list-style-type: none"> • 22 of 48 Members have not had any safeguarding training. • 6 and 10 Members attended the safeguarding children and adult awareness session 	Medium	We recommend, as a minimum, all Members complete the safeguarding E-Learning module. This is to be renewed on a scheduled basis (e.g., every two years).	<p>Responsible Officer: Committee, Member & Scrutiny Officer/ Safeguarding Team (and Service Director: Legal & Community).</p> <p>Responsibility is for Members. Dependent on</p>	

	<p>respectively. Awareness sessions were last held in 2021.</p> <ul style="list-style-type: none"> 17 of 48 Members had completed the E-Learning training. E-Learning training is currently not required to be renewed. <p><u>Associated Risk</u></p> <p>Members have a responsibility for safeguarding, as their role could include contact with members of the public, whilst they may also be required to have oversight of safeguarding arrangements operating at the Council. Without sufficient training, potential safeguarding incidents may not be identified, or appropriate action may not be taken on identification of potential concerns. This could result in harm to the persons in potential danger and damage to the Councils reputation.</p> <p>As part of their oversight role, Members may not have sufficient awareness of safeguarding arrangements to provide challenge and ensure these are operating effectively.</p>		<p>We further recommend, that adult and child safeguarding awareness sessions are run on a scheduled basis for Members (e.g., every two years) or when there is a significant change in membership. We are aware the Council intends to run sessions in 2023/24 following the May 2023 elections.</p> <p>Members with responsibility for oversight of the Councils safeguarding arrangements (e.g., members of the Overview and Scrutiny Committee), should attend the awareness sessions.</p>	<p>Self audit (i.e. if they have undertaken before/ similar or equivalent within the last year), every 4 years.</p> <p>We shall undertake an audit of those elected to check they have undertaken e-learning and seek to ensure outstanding e-learning is taken by them within 6 months. Failing this, this will be completed post all out elections from June 2024.</p> <p>E-learning is sufficient, so not accepted, as a proportionate level for District Councillors.</p> <p>See above, not accepted without Members agreement. This will be reviewed with the Overview & Scrutiny Committee when the Annual Safeguarding report is presented at the September 2023 meeting.</p>	<p>31 December 2023 for current Members.</p> <p>31 December 2024 for newly elected Members in May 2024.</p> <p>N/A</p>
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				At present, E-learning should be completed.	
3.	<p>Corporate Safeguarding Group Meetings</p> <p>From discussions with key officers, we understand that the Corporate Safeguarding Group (CSG) meetings are an important mechanism to feedback and discuss actions with officers holding key safeguarding roles at the Council (including DSOs). This includes guidance and points of practice identified from the HSAB, HSCP and DSG meetings.</p> <p>However, at the time of testing the last CSG meeting was held in November 2021. In addition, a key officer has outlined that the CSG meetings have not previously been aligned to the DSG meetings to ensure feedback is provided and discussed in a timely manner after DSG meetings have taken place.</p> <p>Whilst we acknowledge the Council are restarting the CSG meetings in 2023/24, we have raised this recommendation to ensure these meetings continue to be held and are scheduled within a suitable timeframe after DSG meetings.</p> <p><u>Associated Risk</u></p> <p>Actions, guidance, and points of good practice are not sufficiently disseminated and discussed with officers holding key safeguarding roles at the Council. This could lead to slow or ineffective</p>	Low	We recommend CSG meetings are held at least on a bi-annual basis within the Council, with meetings scheduled to take place within a timely manner after DSG meetings (within a month of DSG meetings taking place).	<p>Responsible Officer: Safeguarding Team Leader.</p> <p>Accept the bi-annual, but not linked to the DSG as these can be cancelled easily/ do not always align and monthly updates are provided to all CSG members in any event by email.</p> <p>June 2023 CSG meeting has taken place.</p>	October 2023 and continuous going forward.

	implementation of such actions.				
4.	<p>Overview and Scrutiny Committee</p> <p>Section 6 of the Councils Constitution ('Scrutiny') includes the terms of reference for the Overview and Scrutiny Committee. Under 6.2.7 (y) it states a term of the Committee is to 'Consider reports relating to the authority's safeguarding responsibilities'. From review of the annual safeguarding reports to the Overview and Scrutiny Committee, we found that the action plans from the most recently issued HSAB and HSCP self-assessments (2020/21 and 2019 respectively) have not been reported to the committee.</p> <p>We acknowledge the actions from the HSCP self-assessment were immediately incorporated into day-to-day working (as assured by a key officer), however the action plan should have been reported to the committee. In addition, we acknowledge the HSAB action plans are usually reported to the committee, however on this occasion this did not take place.</p> <p>It is also our understanding that progress against action plans are reported once a year to the committee as part of the annual safeguarding report. This means that Members could potentially be waiting 12 months for further updates on the action plans. This does not enable Members to have effective oversight of the action positions.</p> <p><u>Associated Risk</u></p>	Low	<p>We recommend all resulting action plans from HSAB and HSCP issued assessments are reported to the Overview and Scrutiny Committee at least twice a year.</p> <p>Actions/ recommendations should continue to be reported to the Committee until fully completed. Only once actions have been reported as completed to the committee (with the committee being happy the actions have been adequately completed), these should be ceased to be reported at future meetings.</p>	<p>Responsible Officer:</p> <p>Safeguarding Team Leader/ Service Director: Legal & Community</p> <p>We include these in the annual report, which ensures any relevant debate as against the figures.</p> <p>The Annual report and an information note will be provided to the Overview & Scrutiny committee to update them on the relevant HSAB/HSCP actions/recommendations</p> <p>The LGA Peer Committee Support report has two recommendations regarding member training. The first recommendation is for whole council training for the 2023 and 2024 induction of new members. The second recommendation is to review the quality of the</p>	To be taken forward for future HSAB/HSCP assessments

	<p>Members are not provided with adequate information on actions/recommendations raised from HSAB and HSCP assessment processes, including the current position of implementation of these actions/recommendations. This could prevent Members from being able to provide adequate oversight and challenge to ensure actions/recommendation are being take forward appropriately and in a timely manner. This could lead to inadequate safeguarding processes.</p>			<p>provision and delivery of training</p>	
<p>5.</p>	<p>Safeguarding Training Tracking and Database</p> <p>Following a review of the safeguarding training tracking arrangements, we identified opportunities where these could be strengthened to track a complete picture of the training received by officers at the Council. These are discussed in further detail below:</p> <p><u>Safeguarding and protecting children and adults in our local communities handout:</u></p> <p>We received management assurance the safeguarding handout is issued to new starters when joining the Council. The handout includes a self-certification form at the end asking the new starter to confirm they have received and read the handout. However, from discussions with key officers, we understand this self-certification form is inconsistently completed and returned by new starters. Also, as discussed further below, the safeguarding team do not currently track the</p>	<p>Low</p>	<p>We recommend:</p> <ol style="list-style-type: none"> 1. the safeguarding handout self-certification process is robustly implemented, with the signed off form being returned to the safeguarding team by all new starters. The date of sign off should then be recorded in the safeguarding training tracker. 2. A monthly report of completed E-Learning safeguarding training is produced by the HR learning and development team and 	<p>Responsible Officer: Safeguarding Team Leader</p> <ol style="list-style-type: none"> 1. Agreed. 2. This is already in place so no further action. 	<ol style="list-style-type: none"> 1. Implemented and continuous going forward.. 2. 31 July 2023.

<p>completion of the safeguarding handout for all new starters at the Council. Therefore, the completion and return of the self-certifications will enable this mechanism of safeguarding training to be tracked for new starters.</p> <p><u>Safeguarding E-Learning Training</u></p> <p>It is understood the safeguarding team have recently begun tracking the completion of the E-Learning safeguarding module by new starters (tracking began at the time of this audit). We understand the safeguarding team are currently confirming completion of the course by asking the officers directly to confirm the date they completed the online module. As we understand reports can be run from the learning system showing the module status of completion, there is an opportunity to instead use this mechanism to confirm training completion, which will support the reliability of information and efficiency of the process.</p> <p><u>Safeguarding Training Tracker</u></p> <p>There is an opportunity to record of the following information on the safeguarding training tracker for a complete view of the safeguarding training completed by officers and renewal deadlines:</p> <ul style="list-style-type: none"> • The training tracker does not record the expiration date (date it must be renewed) for basic or advanced safeguarding training courses. 		<p>provided to the safeguarding team, to enable the training tracker to be populated with this information.</p> <p>3. The training tracker is reviewed to incorporate the information which is not currently tracked (as per the finding).</p>	<p>3. Reviewed and start date is in place.</p>	<p>3. 31 July 2023.</p>
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	<ul style="list-style-type: none"> • There is no consistent recording of the safeguarding handout training being completed by new starters. No dedicated section to record this completion date. • No recording of when the corporate induction safeguarding briefing was given to new starters. • We found the dates of basic or advanced safeguarding training courses were usually recorded as the month and year of completion. For an accurate audit trail, the full date when the course was attended should be logged (day, month, year). <p>Following on from recommendation two above regarding Councillor safeguarding training, tracking of training expiration dates (e.g., E-Learning) should also be incorporated into the Member safeguarding training tracker.</p> <p><u>Associated Risk</u></p> <p>The safeguarding training tracker does not record pertinent information to demonstrate when safeguarding training was delivered or when renewal is required. This could limit the effectiveness of the tracker to support in ensuring all aspects safeguarding training has been completed or renewed in a timely manner.</p>				
6.	<p>Safeguarding Intranet Pages</p> <p>Following a review of the Councils safeguarding intranet pages, the following was noted and</p>	Low	We recommend:	Responsible Officer: Safeguarding Team	

<p>identified as an opportunity to clarify the information available to officers:</p> <ul style="list-style-type: none"> On the Adults Needing Mental Health Support page, the CRHTT referral form for Luton is provided. However, the form and supporting information on the page do not outline where the referral form needs to be submitted. Looking through the DSO intranet page, we found the email address for the current Safeguarding Team Leader has not been included and the formatting of the safeguarding team email address needs to be corrected. For the two intranet pages listed below, we found no link to the DSO intranet page was provided should officers require any support. <p><u>Associated Opportunity</u></p> <p>Opportunity to clarify some of the safeguarding intranet pages, which could provide additional clarity to officers on how referrals should be made or the support available to officers should they require guidance with regards to safeguarding. This could in turn lead to more effective safeguarding at the Council.</p>		<ol style="list-style-type: none"> The Adults Needing Mental Health Support or supporting information includes guidance on how the CRHTT referral form for Luton should be submitted. The DSO intranet page is reviewed and amended to: <ul style="list-style-type: none"> Include the email address of the current Safeguarding Team Leader. Correct the safeguarding team email address which has been provided. For the ‘County Lines, Drugs, Gangs and Cuckooing’ and ‘Safeguarding Information Sharing’ intranet pages, outline the contract details for DSOs (link to the DSO intranet page) and or the central safeguarding team, should officers require support. 	<ol style="list-style-type: none"> Contacted Luton and not accepted as this is Luton’s information and they do not accept third party referrals any longer Council Intranet pages have been updated to remove information on Luton referrals as no longer relevant. This is a very small team and not appropriate to provide the individual email address for 2 part time officers. The corporate generic email will be provided as it currently is. Links have been reviewed and working with support in place. 	<ol style="list-style-type: none"> Implemented. N/A. Implemented.
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