



SECTION 11 OVERVIEW AUDIT REPORT 2021

July 2022

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1. Overview

In recognition that s.11's audits has been in place since 2004, the Wandsworth Safeguarding Children Partnership [WSCP] moved from a model where the WSCP took responsibility for co-ordinating the s.11 process to one where they are assured by partners that they had systems in place to be compliant with the requirements. The self-assessment is based on the 2004 Children Act, s.11 standards [\[Appendix 1\]](#). All the submissions used the WSCP template, however, one agency used their own which made comparison and collating the data challenging. A scrutiny panel chaired by the independent chair/scrutineer to moderate agency findings attended by several senior managers, the outcome did not achieve all that it had set out to do as the panel was not mandatory and not all agencies were represented. The scrutiny panel is an area for further development.

The audit was developed in consultation with the s.11 Audit Group. The format of the self-assessment template, survey and interview questions were new as word documents and MS Forms surveys. The audit group are looking at an online tool for WSCP to commission to make the process quicker, simpler, and easier interrogation of the data.

This report sets out the details of the s.11 Audit undertaken in 2021. It summarises and analyses agency responses identifying strengths and areas for improvement. The process to complete the s.11 audit proved challenging such as avoiding drift and getting involvement of more agencies, these and other areas will be looked at for improvement.

The partnership involved front line staff in the process and the s.11 Audit Group devised a series of questions to elicit views from a staff survey and interviews.

Partner agencies and practitioners engaged well with the overall process and feedback was positive and the WSCP wants to thank all those have been involved for giving time to the process alongside other work responsibilities. For some agencies, this process built on safeguarding compliance that is already in place, for others it helped with understanding s.11 standards more clearly. The WSCP found the overall process useful in benchmarking where all agencies were at, as well as supplying a wealth of information of services/practice provided in Wandsworth. However, there is recognition that the process needs to be refined and to use the learning to improve structure and adherence to timescales.

The audit was undertaken between October 2021 to March 2022.

2. Summary

The s.11 audit provides sufficient evidence of safeguarding compliance with s.11 standards and, therefore the WSCP can be assured that the key agencies who completed the self-assessment are fulfilling their duties. However, benchmarking proved challenging as some agencies BRAG rated themselves higher than others but did not provide as much evidence to support their rating. The moderation exercise will need to be more robust in challenging and scrutiny.

The involvement of frontline staff through the survey and interviews supplied further evidence and assurance that staff understand their safeguarding responsibilities. However, as the numbers were a small percentage of the workforce the ambition for future s.11 audits will be to increase the number of practitioners and agencies.

Common themes from the findings were senior management and leadership having a presence; policy and procedures being adapted in line with external factors such as covid-19, how the child's voice is heard in service delivery and is used in improving service delivery, how anti-racist/diversity and equality are central to areas of service delivery.

The findings highlight good work across the partnership and finds areas for further improvement. Each agency as part of the self-assessment were tasked to moderate their findings with peers and agree their own improvement plan. [Section 5](#) gives an overview of key findings.

3. Introduction

- 3.1 Section 11 of the Children Act 2004 requires each person or body to which duties apply to have regard to any guidance given to them by the Secretary of State and places a statutory requirement on organisations and individuals to ensure they have arrangements in place to safeguard and promote the welfare of children.
- 3.2 The Wandsworth Safeguarding Children Partnership (WSCP) assesses the effectiveness of local safeguarding arrangements in several ways, including Section 11 safeguarding self-assessments. Currently the WSCP discharges this function by conducting a section 11 assessment on an annual basis.

- 3.3 This report sets out the details of the Section 11 Audit undertaken in 2021. It summarises and analyses agency responses by showing strengths and areas for improvement and learning.
- 3.4 A multi-agency Audit Group met several times to develop the audit tool based on the s.11 standards. To support the process and get the views of frontline staff the group devised questions for a staff survey.
- 3.5 The findings are used to inform the final report.

4. Methodology

The self-assessment consisted of 9 sections and partners were asked to rate themselves against questions in each section. All agencies were asked to grade Blue, Red, Amber, Green [BRAG] to each question. Senior managers from eleven partner agencies undertook a self-assessment and each produced a final document that was BRAG rated for the WSCP.

Frontline staff across the partnership were asked to undertake a MS Forms survey at the start of training sessions. Members of the Audit Group randomly named staff to take part in the interviews.

A panel of senior managers chaired by the independent chair and scrutineer met to scrutinise the self-assessment returns. Attendance at the panel was not mandatory and not all agencies were represented. An outcome of the meeting was for partners to meet with peers to moderate their self-assessments and supply improvement plans.

5. The Findings

Eleven partners were given detailed self-assessment forms and were asked to score [BRAG] themselves on the questions under each of the 9 standards:

St Georges University Hospital	Cafcass
Childrens Social Care	Police
Early Help	SWL St Georges Mental Health Trust
Education	SW London CCG
Housing	CLCH

- Standard 1: Listening to children and young people
- Standard2: Leadership and accountability
- Standard3: Information sharing, communication, and confidentiality
- Standard 4: Policies and procedures
- Standard 5: Complaints, Allegations, escalation, and whistleblowing
- Standard 6: Staff Induction, Training/Supervision/Development
- Standard 7: Anti- Discriminatory Practice

- Standard 8: Quality Assurance/Impact/outcome
- Standard 9: Commissioning, Procurement, and/or Provision of Services





5.1 **Key Findings from self-assessments**

5.2 The most frequent BRAG rating is included in this section, where there are two equal ratings this is reflected.

RED	Indicates that processes are lacking and need to be developed as a matter of urgency to meet minimum requirements for a specific standard
AMBER	Indicates that processes are in place, but they need to be reviewed or further improved for a specific standard
GREEN	Indicates that the agency meets the standard fully with all processes in place and up to date, at least to the required minimum
BLUE	Indicates that the agency meets the standard fully with all processes in place and up to date, with evidence of achieving excellence.



1. Listening to Children and Young People

Overall BRAG

1.1 Organisation evaluates outcome/impact from the child /young person’s perspective	
1.2 Children/Young People depending on age/development are including in their care plan	
1.3 Children are informed /made aware of staying safe	
1.4 Evidence that service design/review are informed by children and young people’s views	

- Evidence across all agencies that children are at the heart of everything they do, their voice and lived experiences are central and continues to be of upmost importance
- Agencies shared examples of tools that used in a variety of ways to engage children and young people
- Examples of good and evolving practice shared and impact it has made on the outcomes for children
- During the COVID-19 pandemic all partners found new innovative ways to work with children and young people.
- Policies /procedures showed that voices /views of young people embedded in practice
- Most agencies showed evidence of sitting on panels and listening to the views of children
- Case management/files/recordings and care plans included involvement of children
- Publicity and communication activities was reflected in some agencies feedback
- All agencies included complaints/comments and compliments in showing the views of children/young people

2. Leadership and Accountability

2.1 Senior management accountability	
2.2 Effective interagency working	

- Evidence of s.11 compliance across all agencies
- Senior leaders accountable and shown in meetings/document signatories
- Strong presence at the WSCP at executive level and subcommittees and working groups
- Policy changes/practice and updates communicated as Covid-19 developments changed
- Across all agencies clear safeguarding policy/processes in place
- Safeguarding leads known by partners

- Governance of the WSCP has been revised in line with Working Together 2018
- Individual agencies corporate plans reflect safeguarding needs
- Structures of accountability is clear
- Examples of senior managers leading/agreeing to innovative ways of working
- Attendance at strategic and operational multi agency meetings/panels

3. Information Sharing, Communication, and Confidentiality

3.1 Effective arrangements for information sharing and information sharing governance	
3.2 Agencies are signatories to relevant information sharing agreements	

- Most/all organisations have policies on information sharing in line with national statute and guidance
- Training in place for staff
- Confidentiality and consent processes are in place
- Organisations are compliant with current data protection act, including storing confidential and sensitive data
- Caldicott guidance is adhered to including storing and recording information
- Most agencies showed how information sharing impacts on outcomes
- Most agencies said that performance data is shared with the WSCP
- Most agencies are signatories to relevant information sharing agreements

4. Policies and Procedures

4.1 Clear policies and procedures to support safeguarding concerns	
4.2 Organisation has safeguarding policies and procedures as necessary to respond to Covid-19	

- All agencies have published safeguarding policies and procedures aligned and compliant with London Safeguarding Children Procedures and national guidance
- All agencies’ policies and procedures reviewed and updated in line with Covid-19 changes
- Staff and volunteers supported with training
- Procedures in place for escalation of concerns
- All agencies have access to WSCP guidance and procedures
- Internal and external policies accessed via the intranet
- Clear processes for commissioning and contracting of services
- Most agencies did not BRAG rate for section 4.2, no explanation was given


5. Complaints, Allegations, Escalation and Whistleblowing

5.1 Safer recruitment procedures	
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- Agencies have safer recruitment and selection procedures in place including those of volunteers and commissioned services
- Several agencies include young people as part of staff selection process
- Recruiters attend relevant training on safer recruitment
- All employees are subjected to DBS /enhanced checks
- Engaging the LADO is clear when to make contact


- Audit process in place to monitor safer recruitment and manage allegations
- Evidence of recruitment governed by a range of HR policies/procedures /guidance
- Commissioned, contracted services providers also have procedures re safer recruitment
- Some agencies offer Employee Assisted Programme for staff where allegations have been made
- Staff are given information so they know who to contact in relation to abuse of a child
- All agencies have complaints guidance
- Managing allegations procedures in place
- All have whistleblowing and escalation procedures in place

6. Staff Induction, Training/Supervision/Development

6.1. Effective safeguarding training and development for staff and volunteers 


- Agencies have induction processes in place
- Staff receive safeguarding and other training on a multi and single agency basis
- Some agencies link supervision and appraisal into training plans
- Refresher safeguarding training offered
- Staff appraisals in place
- Staff receive additional training on specialist safeguarding areas
- Safeguarding training offered to volunteers
- Staff attend agency specific safeguarding training
- Supervision /support is provided to staff
- Staff are trained in risk assessment tool
- One agency was specific that mandatory training is required at every level
- Agencies have systems that can evidence impact of training

7. Anti-Discriminatory Practice

7.1. All staff understand the value of the equality and diversity policy in contributing to improved outcomes for ALL children 

- Policies and procedures highlight issues of equality and diversity
- Some agencies actively support having diverse recruitment panels
- Recruitment and selection policies highlight issues of equality and diversity
- Disproportionality shown across all agencies and looking at ways as single and multi-agency to combat
- Agencies have equality and diversity statement

8. Quality Assurance/Impact/outcome

8.1 Programme of internal audit and review 

- All agencies have systems in place to undertake auditing and self-assessments and ensuring children are at the centre of outcomes
- Agencies take part in WSCP multi agency audits

- Audit findings are reported to agency and WSCP governance
- Significant internal review mechanism in place
- One organisation has an organisational learning board in place where issues are solved
- Quality assurance embedded in key processes
- Some agencies have quality standards through professional registrations
- Reviewing processes to ensure compliance

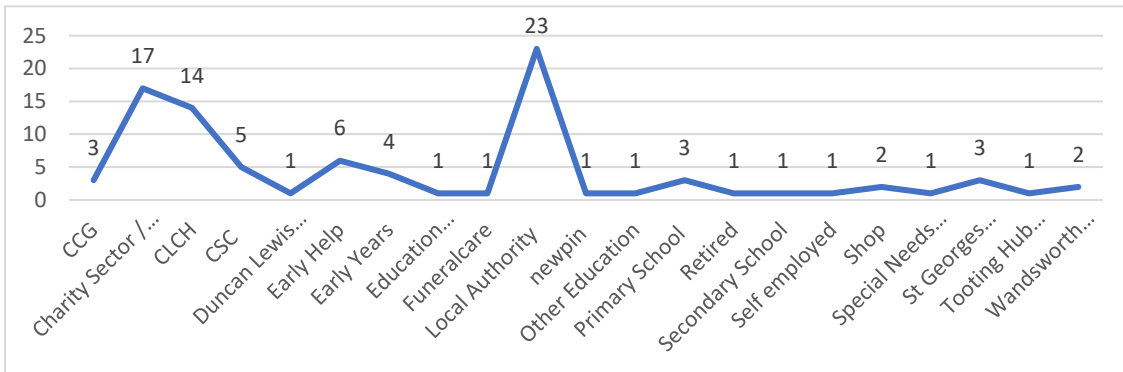
9. Commissioning, Procurement, and/or Provision of Services

9.1 Contracts/specifications/agreements have embedded safeguarding guidelines and expectations

- Contract agreements are s.11 compliant
- Ongoing monitoring arrangements in place
- External scrutiny in place
- Commissioned services have comprehensive single and multi-agency safeguarding policies and procedures informed by the LSCP
- Commissioners collaborate with safeguarding teams
- Following corporate council policies
- Monitoring processes in place for contractors

5.3 Key findings from staff survey

Staff were asked to complete the survey at the start of training, gives a cross reflection of staff and was random. The survey consisted of five questions and 92 responses were received see chart below. Due to the size of the sample this is a snapshot of the workforce.



Q.1 Do you have a safeguarding role?

- Seventy-one percent of responders said they had a safeguarding role; however, seven percent were not clear if they had a safeguarding role. This is something for individual agencies to follow up. Of the ninety-two who completed the survey, ninety-one were able to name who they would contact if they had a safeguarding concern.

Q.2 What level of safeguarding training have you had within the last twelve months?

- Fifty-five percent of responders said they had completed level 1- 3 safeguarding training within the last twelve months, apart from the training when completing the survey. Of the ninety-two, forty five percent selected that they had completed other safeguarding training.

Q.3 Can you please name one area of strength in the safeguarding practice in your service?



- Only five responders were unable to name an area of strength, one was a new member of staff.

Q.4 Who would you contact if you had a safeguarding concern about a child?

- All responders knew who to speak to if they had a safeguarding concern about a child



Q.5 Who would you contact if you have concerns about a colleague or other professional or Volunteer’s behaviour towards children?



- All respondents were able to name the person or the role of who they would contact if they had a safeguarding concern about a child.

5.4 Key findings from random selected staff interviews

Of the fifty-seven random names provided by agency leads from the s.11 planning group only nineteen responded to interview invites. Interviewers were a cross section of multi-agency leads and this exercise allowed the opportunity for elaboration of answers. There is recognition that future exercise should involve a larger percentage of the workforce.

Agencies involved in the interviews:

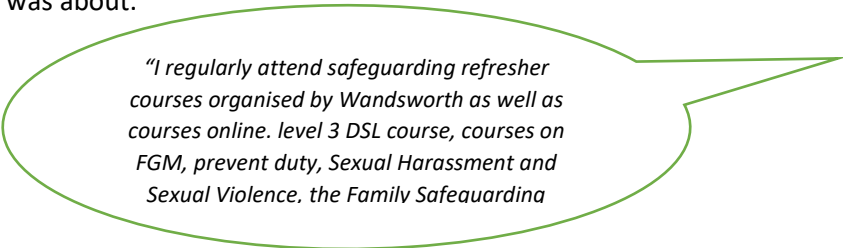
CSC (1) ; Education (2) ; Health (12) ; Housing (4)

Q.1 Do you have a safeguarding role?

- Ten percent of those interviewed did not have a safeguarding role but acknowledged that safeguarding is everyone's business and showed that they would know what to do if they were made aware of a safeguarding concern.

Q.2 What level of safeguarding training have you had within the last twelve months?

- All those interviewed had undertaken safeguarding training in the previous twelve months and said what the training was about.



"I regularly attend safeguarding refresher courses organised by Wandsworth as well as courses online. level 3 DSL course, courses on FGM, prevent duty, Sexual Harassment and Sexual Violence, the Family Safeguarding"

Q.3 Can you please name one area of strength in the safeguarding practice in your area?

- Fifty percent said good communication within teams, partnership working, joint supervision was all considered as an area of safeguarding strength in their service.

Q.4 Who would you contact if you had a safeguarding concern about a child?

- All knew what to do if they had a safeguarding concern about a child and thirty percent said they would make a referral to MASH after taking advice from a senior manager.

Q.5 Who would you contact if you had concerns about a colleague or other professional or volunteer's behaviour towards children?

- All knew who to contact if they had concerns about a colleague /other professional or volunteer's behaviour towards children

6. Analysis

- The s.11 self-assessment audit was limited to 11 key partners and therefore recognition that agencies such as the voluntary sector and others were not included and this needs to be considered for the next audit. Overall, the findings from the s.11 audit showed all agencies who completed their self-assessment scored an average rating of green giving assurance that they were compliant with their section 11 responsibilities. However, the scrutiny and moderating need to be more robust.
- All but one of the submissions used the generic template which made it difficult to align with the others. The audit group has been looking at an online tool to make the process simpler and quicker.
- Most of the submissions were supported with links and attached documents supplying a plethora of evidence to support their information, however, a small number supplied limited or no evidence. This is something that the scrutiny process can explore further.
- Agencies were able to show how they listened to children and young people and the importance of their involvement in their care plans and service development.
- There was evidence across the agencies that leadership and accountability was high on the agenda and how senior managers were able to influence strategic planning and thinking.
- Information sharing and communication across all agencies was reflected in the various policies and procedures that were available and agreements that they were signed in line with local and national arrangements.
- Agencies have a plethora of guidance and policies on safeguarding children including linking in with London and national procedures
- Dealing with allegations of abuse and making complaints was shown across all agencies with all necessary procedures and guidance
- The importance of staff induction, training is available for all staff and each agency was able to show single and partnership responsiveness in this area
- For Wandsworth anti-discriminatory practice and working with diversity and disproportionality is particularly important across all agencies and they were able to supply a range of examples and practice developments to improve service delivery.
- All agencies reflected that understanding impact and outcomes of service delivery through various quality programmes and links with the WSCP
- Agencies had systems in place to ensure that commissioning and procurement were compliant with s.11 requirements. For some agencies where this is a key part of service delivery were able to show a plethora of examples how this standard was managed

- The findings from the survey and interviews were a snapshot of staff representation, which supported the findings from the self-assessments by frontline staff. Individual agencies will manage following up areas in their service where feedback would be expected to be one hundred percent. e.g., 2 staff from the survey did not know what to do if they had a concern about a colleague or volunteer's behaviour towards a child.
- The ambitions of the scrutiny panel to review and moderate the self-assessments did not meet expectations in peer-on-peer scrutiny. Further work is required to have the necessary structures and systems in place to improve this process, nonetheless, there was learning by all those who attended the panel.

7. Learning and Key Points

The process undertaking the s.11 audit for 2021 showed that the agencies in Wandsworth are compliant with s.11 standards by completing self-assessments, staff surveys and face to face interviews. The process was not without challenges ; however, these will be used to build on the process for the next audit cycle which are:

1. Self-assessment audit

- Process and expectations are identified
- All agencies to complete the same template
- Timely returns of completed assessments
- Build in the scrutiny panel at the start of the planning
- Moderation process and outcomes to be defined – with peer on peer / comparison /scrutiny/challenge
- Evidencing the evidence
- To include other agencies

2. Staff survey

- Embedding the survey at single / WSCP training activities
- Get the views from a larger number of staff from a wider range of agencies
- Publicising the survey so that staff know that it is happening and why
- Follow up by single agency where action is needed

3. Staff interviews

- A higher number of frontline staff/different groups (not senior staff) across more agencies to be put forward
- Follow up from agency leads to promote the interviews
- Publicising the process
- Adapting the interviews to reflect different agency needs

8. Next Steps

- Report and Options paper to MQ&P subcommittee 14th July 2022
- Report and recommendations to the WSCP executive 27th July 2022

9. Improvement Plan

1. The completion of the s.11 self-assessment audit was time consuming and for agencies completing the tool and the business team to pull together the findings . WSCP to commission the online tool [PHEW] being used by other local authorities .
2. To ensure timeliness audit cycle and activities are publicised across partners and agency leads are proactive in sharing the information and working within their own agencies
3. The role of the scrutiny panel /membership to be defined with achievable outcomes including having sight of improvement plans
4. Further work needed to work collaboratively with other South West London authorities to reduce burden on some organisations that work across more than one geographical area.
5. Everybody using the same audit tool to enable easier comparisons across agencies.
6. Agency review and identify agency leads.
7. WSCP to share the findings with practitioners.
8. Single agencies following through findings that require further learning within their own agencies.

Appendix 1

Section 11 standards

- 5.2 Working Together to Safeguard Children 2018 states the following as Section 11 standards:
- A clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children
 - A senior partnership level lead with the required knowledge, skills, and expertise or sufficiently organisation's/agency'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
 - Clear whistleblowing procedures, which reflect the principles in Sir Robert Francis Freedom to Speak Up Review and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed.
 - Clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies.
 - Arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners.
 - A designated practitioner (or, for health commissioning and health provider organisations/agencies, designated and named practitioners) for children safeguarding. Their role is to support other practitioners in their organisations and agencies to recognise the needs of children, including protection from possible abuse or neglect. Designated practitioner roles should always be explicitly defined in job descriptions. Practitioners should be given sufficient time, funding, supervision, and support to fulfil their child welfare and safeguarding responsibilities effectively.
 - Safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with the children, including policies on when to obtain a criminal record check
 - Appropriate supervision and support for staff, including undertaking safeguarding training
 - Creating a culture of safety, equality, and protection within the services they provide
- 5.3 In addition:
- 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 the procedures to be followed if anyone has any concerns about a child’s safety or welfare
- All practitioners should have regular reviews of their own practice to ensure they have knowledge, skills and expertise that improve over time