

## Hillingdon Safeguarding Partnership

### Quality Assurance Audit

### Section 11, Children Act 2004.

### Executive Summary

#### Summary

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and those of any services that they contract out to others or license, are discharged having regard to the need to safeguard and promote the welfare of children. The application of this duty will vary according to the nature of each agency and its functions.

The Safeguarding Partnership has undertaken an audit of compliance with section 11 across relevant partnership member organisations. The findings have provided assurance that the organisations that completed the self-assessment are, in the vast majority, discharging their duties with regards to the welfare of children and are therefore compliant with the duties set out in Section 11 Children Act 2004 and [Working Together to Safeguarding Children](#). The areas of particular strength for the partnership are leadership and accountability, safer recruitment, information sharing, complaints and whistleblowing.

The key opportunities for development are around listening to the voice of the child, management of allegations against people in positions of trust relating to their conduct outside of their work, ongoing monitoring of Disclosure and Barring Service checks, and ongoing monitoring of training compliance. There is also an opportunity to enhance the child safeguarding components of local licensing processes.



For the majority of the applicable standards that were marked as ‘partially met’ or ‘not met’, organisations have produced robust improvement plans with clear actions proposed, clarity of accountability, and timescales for actions to be completed. This provides a framework for each organisation to monitor and develop their own compliance.

70% of all organisations that were approached responded with completed audits. 40 out of 43 responding organisations met 80% or more of the standards required for compliance with section 11. Only one organisation met fewer than 60% of the standards applicable to their service. This organisation’s audit submission has been brought to the attention of the relevant safeguarding strategic lead for follow up and support.

Primary care was the largest group of respondents, making up 29 of the 43 completed audits. Large health providers, voluntary sector organisations and commissioned services had a high response rate. In these organisations assurance about compliance with section 11 was robust.

The Local Authority, ICB and Police responses were focused on particular departments rather than organisation-wide. This results in some pockets of uncertainty around compliance for example in commissioning of sexual health services, licensing processes, and domestic abuse services. Consideration needs to be given as to how to pursue assurance in these areas going forward.

There is an intention to revisit a section 11 audit again in 2024, which will enable the partnership to measure the impact of the learning from this audit and review continued compliance with section 11.

## Recommendations by Assessment Area

### Leadership and Accountability

- Share good practice examples identified within the audit regarding designated safeguarding lead arrangements.
- Promote the need for designated or lead practitioners in all organisations, including clarity as to who holds this responsibility in each organisation, and clearly defining roles and responsibilities in that person’s job description.

### Voice of the child

- Share good practice examples identified within the audit around voice of the child.
- Promote the voice of the child, particularly for seldom heard children including looked after children and children with complex needs and disabilities.

### Information Sharing, Communication & Confidentiality

- Increase awareness of the value of GP involvement in strategy discussions and Child Protection conferences and challenge local practice norms around inviting GPs to attend or contribute to key meetings.
- Refresh awareness across the partnership that there is a responsibility for referring professionals to proactively follow up their referral with Children and Young People's Service if they do not receive a response, or if there is a difference of opinion about the level of risk.
- Raise awareness across the partnership of the Safeguarding Partnership Escalation Policy.

### Complaints, Allegations, Whistle-blowing & People in Positions of Trust

- Refresh local knowledge of LADO processes and the importance of clear policies and procedures around responding to concerns relating to staff conduct outside of work.

### Safer Recruitment Practice and Induction

- Increase awareness of the importance of ongoing monitoring of DBS checks for existing employees who have contact with children. Include this explicitly in future section 11 audits.

### Training and Supervision

- Improve quality assurance of individual practice and ensure safeguarding practice is routinely included in appraisal and supervision. Consider if there is a role for

peer/service user feedback on safeguarding practice and how this could be implemented.

- Increase awareness of the need for agencies to track staff completion of child safeguarding training and establish mechanisms to ensure that training is refreshed at appropriate intervals.

Other considerations for the partnership:

- Enhance local licensing processes to ensure that licensing decisions are robust in protecting and promoting the welfare of children.
- Explore ways to seek assurance of section 11 compliance in sexual health services, domestic abuse services and local authority licensing processes going forward.
- In future audits, additional guidance should be issued with the audit tool to increase clarity of expectations in order to reduce misunderstandings about what standards mean and what meeting the standards looks like in different service types. The timing of future audits should be agreed by key partners.