

# GREATER LONDON AUTHORITY

## REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2651

### Title: GLA Safeguarding Audit

#### Executive summary:

The GLA, through its work, engages with young and adult Londoners from diverse backgrounds. Some of the Londoners engaging with the GLA are vulnerable and disadvantaged; in some situations, the organisation will have a duty of care towards them. Given the GLA's responsibility to safeguard young Londoners and adults at risk, it is imperative that robust safeguarding structures are in place, and safeguarding is embedded into all work areas.

This ADD seeks approval for expenditure of up to £25,000 to commission an external expert safeguarding agency to undertake an audit of the GLA's safeguarding arrangements, roles and responsibilities; and to design a safeguarding model that enables the organisation to respond to its obligations.

#### Decision:

That the Executive Director for Communities and Skills approves:

- spend of up to £25,000 in 2023-24 to cover the cost of commissioning an organisation to audit the GLA's safeguarding processes, and recommend a framework that will support the organisation to deliver its safeguarding responsibilities
- an exemption under section 10 of the GLA's Contracts and Funding Code in order to commission the Social Care Institute for Excellence to undertake the audit, as the organisation has been commissioned by the People function to deliver safeguarding training.

#### AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

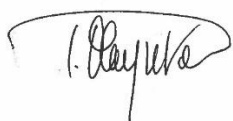
I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

**Name:** Tunde Olayinka

**Position:** Executive Director,  
Communities & Skills

**Signature:**



**Date:**

22 July 2023

## **PART I – NON-CONFIDENTIAL FACTS AND ADVICE**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1. Safeguarding is everyone's responsibility, and the GLA is committed to protecting Londoners. To achieve this, the organisation is working towards ensuring that robust structures focused on prevention and protection are in place, and safeguarding is embedded into all work areas. The GLA's work on safeguarding is rooted in taking a child-centred approach; and, for adults, a strength-based approach that acknowledges the need to draw on their assets to achieve the best outcome.
- 1.2. The organisation's work on safeguarding has most recently been led by the Digital Safeguarding Group, which brings together managers across the GLA with a safeguarding remit. This comprises managers from HR; Public Liaison; Children and Young Londoners; Security Management; Skills and Employment; and Research and Engagement. A representative from the Mayor's Office for Policing and Crime also attends the group's meetings. The Digital Safeguarding Group's aim is to ensure it achieves its digital safeguarding commitments. The group also ensures joined-up working with other safeguarding policies at the GLA – namely the Child Safeguarding Policy and the newly launched Adult Safeguarding Policy – as the Digital Safeguarding Policy refers to and depends on these. During a meeting on 26 July 2022, members discussed their concerns about the coordination of safeguarding activity at the GLA.
- 1.3. The concerns raised included: an increase in the number of safeguarding cases; a lack of a coordinated safeguarding response across the organisation; the limited staff capacity to respond to the volume of cases, and the impact of this on their emotional wellbeing; and the need to upskill staff to respond appropriately to enquiries.
- 1.4. This ADD is seeking approval to procure expert safeguarding auditing services, via spend of up to £25,000, to provide insight into the GLA's safeguarding arrangements, roles and responsibilities; and to design a safeguarding model that enables the organisation to respond to its obligations. It is proposed that this work is undertaken over a period of no more than three months. The need for this review was collaboratively identified by officers and the Corporate Management team.
- 1.5. Section 10 of the Code sets out the grounds for the exemption from normal procurement processes. This decision seeks the approval of an exemption from the requirement of the Code to award a contract to the Social Care Institute for Excellence (SCIE) without first running a competitive tendering process by seeking three or more written quotes from suitable suppliers.

#### Exemption from the Contracts and Funding Code

- 1.6. Section 10.1 of the Code provides that a contract may be awarded directly on the basis of the service provider's continuation of existing work, which cannot be separated from the new project/work; the complete absence of competition; and the supplier's unique ability to provide compatibility with an existing service. The SCIE currently delivers safeguarding training for the GLA, so the organisation is known to deliver a high-quality service at a competitive price. The SCIE's current work with the GLA means it already has insight into the GLA's work to safeguard Londoners. The SCIE is also an expert organisation in safeguarding children and adults; this is rare, as other organisations only focus on one area. The SCIE has trademarked its audit methodology, which uses a unique system approach to safeguarding audits/reviews. The government funds the SCIE to produce the Safeguarding Quality Markers: standards for good-quality safeguarding reviews and audits. For these reasons, the SCIE is best placed to review the GLA's safeguarding processes.

## **2. Objectives and expected outcomes**

- 2.1. The overall objective is to provide the GLA with an independent and comprehensive assessment of its safeguarding processes, and how they should be improved, to ensure that it is meeting its responsibility to safeguard Londoners and staff.
- 2.2. This will be achieved through a review and audit process. The assessment will include:
  - assessing the effectiveness of the Adult Safeguarding policy and Digital Safeguarding policy, and reviewing the Child Policy and Protection Procedures; and then advising on who should take ownership of these policies
  - reviewing other related policies, e.g. the whistleblowing policy
  - a safeguarding audit of a sample of responses to serious safeguarding cases (emails and WriteOns) – this will provide insight into the quality of responses; identify the kind of advice staff need support with; identify training and development needs; and identify what systems need to be in place to bolster the GLA's ability to respond appropriately
  - a safeguarding review of the current approaches and systems across directorates, to provide an understanding of the quality and robustness of safeguarding responses, and recommend a new safeguarding model – one that looks at providing a process for reporting, and ensures better safeguarding processes are in place overall (exploring, for example, whether a new safeguarding manager role should be created to lead on case management; how cases are escalated within and across teams; the reporting and referral pathway; providing advice; reviewing policies and procedures, etc)
  - recommending and/or advising on the content of training and development programmes that meet the needs of the different directorates
  - reviewing HR safeguarding processes (including safer recruitment): this will revisit the work done as part of the internal audit of safeguarding
  - defining and making recommendations about the GLA's role and responsibilities within the context of the current safeguarding statutory frameworks and arrangements for children and adults: this must also include individual accountabilities and leadership, as outlined below
  - providing advice on any risk entry encompassing safeguarding to the corporate risk register
  - designing, and/or identifying and recommending, an effective mechanism to implement the recommendations to take this work forward.
- 2.3. The outcomes from the completed review/audit are likely to include the following:
  - Londoners who engage with the GLA are better safeguarded and supported
  - staff engaged with Londoners are upskilled and can confidently respond to safeguarding concerns
  - there is an increase in the number of serious safeguarding concerns managed effectively.

## **3. Equality comments**

- 3.1. Under section 149 of the Equality Act 2012 (the Equality Act), as a public authority the Mayor must have due regard to the need to: eliminate discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Equality Act; and advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not.
- 3.2. The GLA, through its work, engages with young and adult Londoners from diverse backgrounds. Some of the Londoners engaging with the GLA are vulnerable and disadvantaged; in some situations, the organisation will have a duty of care towards them.

- 3.3. Evidence suggests that children of Caribbean and African heritage are overrepresented in the care system, and that these young Londoners face higher unemployment rates. Children from poor backgrounds experience a high rate of entry into the child-protection system: in the UK, a 1 per cent increase in child poverty is associated with an additional five children entering care. In comparison to White people, five times as many Black people, and twice as many Asian people, are diagnosed with schizophrenia. These groups face many disadvantages, and are at a higher risk of adverse childhood experiences.
- 3.4. Safeguarding children and adults at risk is a core activity for the GLA. The GLA's work on safeguarding focuses on all groups, and takes an intersectional lens when undertaking this activity. The scope of this audit work will ensure the organisation has proper safeguarding processes in place to respond to the safeguarding needs of Londoners.

#### 4. Other considerations

##### Key risks and issues

- 4.1. The key risks and issues are outlined in the table below.

Risk	Mitigating action	Risk rating
Lack of engagement and buy-in from all the directorates.	Set up a task-and-finish group with members from across the organisation, with each area nominating a lead who will be responsible for ensuring engagement.	Amber
Lack of meaningful engagement and buy-in from Corporate Management team to support this work and follow through any recommendations.	Executive director responsible for the review to campaign this work and obtain ongoing buy-in at corporate level.	Green
Absence of an executive director taking leadership, resulting in the recommendations not being implemented.	Identify an executive director who will take leadership and champion the work on safeguarding at a strategic level.	Green
Resistance from staff to engage in the audit.	Develop a comms and engagement plan that will keep staff informed and provide updates as the audit is being conducted. Units are in the process of identifying designated safeguarding leads who will attend safeguarding training, so connecting with these leads will help bolster engagement.	Green

- 4.2. This project links to the People function's work on the rollout of adult safeguarding training and the newly published adult safeguarding policy.
- 4.3. There are no conflicts of interest to declare in relation to the staff involved in this project.

#### 5. Financial comments

- 5.1. This ADD seeks approval for the expenditure of £25,000 in 2023-24 to cover the cost of commissioning an organisation to audit of the GLA's safeguarding processes; and to recommend a safeguarding framework that will support the organisation to deliver its safeguarding responsibilities.
- 5.2. This will be funded from the Communities and Skills Director budget.
- 5.3. There is sufficient budget within the Communities and Skills Director budget to meet the expenditure of £25,000 in 2023-24.

## 6. Planned delivery approach and next steps

6.1. The project will be delivered according to the timetable below.

Activity	Timeline
Procurement of contract	July 2023
Delivery start date	July 2023
Delivery end date and final report submitted	October 2023

### Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

### Part 1 – Deferral

**Is the publication of Part 1 of this approval to be deferred? NO**

### Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

**Is there a part 2 form – NO**

### ORIGINATING OFFICER DECLARATION:

Drafting officer to  
confirm the  
following (✓)

#### Drafting officer:

Leethen Bartholomew has drafted this report in accordance with GLA procedures and confirms the following:

✓

#### Corporate Investment Board

A summary of this decision was reviewed by the Corporate Investment Board on 17 July 2023.

✓

### ASSISTANT DIRECTOR, FINANCIAL SERVICES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

**Signature:**



**Date:**

19 July 2023