

**Manchester City Council
Report for Information**

Report To: Audit Committee - 14 July 2016

Subject: DBS Checks: Assurance Update

Report of: Head of Audit and Risk Management

Summary

An internal audit report on the level of assurance for compliance with DBS arrangements published in the summer on 2015 gave limited assurance on the Council's arrangements with a high capacity to improve. This report provides a short update on actions taken in response to this report.

Recommendations

Members are requested to note the progress update

Wards Affected:

None

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Background documents (available for public inspection):

- Internal Audit Plan 2015/16 and 2016/17
- Quarterly assurance reports presented to Audit Committee in 2015/16
- Head of Internal Audit Annual Opinion 2015/16

1 Introduction

- 1.1 An internal audit report on the level of assurance for compliance with DBS arrangements published in the summer on 2015 gave limited assurance on the Council's arrangements with a high capacity to improve.
- 1.2 In November, following discussion at Strategic Management Team (SMT) a request was made for a group to be set up to bring the right people together from across the organisation to address the issues raised in the report. This group has met monthly and an update was provided by The City Solicitor and Strategic Business Partner, Children and Families to SMT in April. The key elements of this update and agreed next steps are summarised below.

2 Background and Context

- 2.1 The internal audit of DBS identified areas of good practice but also noted areas of improvement required to ensure (i) individuals who required DBS checks had these undertaken within the agreed timescales; (ii) records of risk assessments or Lead Countersignatory approval were retained; (iii) the Disclosure Procedural Framework be kept updated; and (iv) named Lead Countersignatories be confirmed for all Directorates.

3 Progress Update

- 3.1 A range of activity was quickly undertaken to address a number of the issues raised thereby improving the level of organisational assurance. These included:
- Clarification of Lead Counter-Signatories for the Directorates
 - CRB procedural framework updated in light of changes to legislation and audit recommendations and available on HROD intranet pages.
 - Escalation process modified so that lead counter-signatories are informed of staff who have not complied with requests to renew their DBS via the monthly escalation report.
 - Procedures enhanced to improve oversight of changes to eligibility for DBS, disclosure issues and risk assessments.
 - Amendments to the existing data destruction arrangements in the electronic records/emails are managed and stored in line with the Data Protection Act and the Disclosure and Barring Handling and Storage Policy.
- 3.2 As part of the DBS Group some wider issues were identified and a number of actions are being progressed to address these:
- A protocol has been developed which clarifies the roles and responsibilities of Lead Counter-Signatories, counter-signatories and managers. This protocol is to be reflected in an induction pack for new counter-signatories.
 - The DBS group will meet quarterly to enable reporting on the level of DBS assurance within the organisation and to provide a forum for key individuals, including the Lead Counter-Signatories to come together,

share intelligence, share learning, agree consistent approaches where issues arise and be proactive in identifying DBS-related issues which need to be addressed.

- Legal Services undertook a review to interpret the requirements of the Act regarding which roles require a DBS. As a consequence of this review, Lead Counter-Signatories have now agreed an approach to reviewing which roles require a DBS. The reviews are underway and updates are being provided at the next DBS Group meeting.
- A joint piece of work has been commissioned from HR and the Compliance Manager, working in consultation with the Lead Counter-Signatories to review current arrangements with regard to DBS requirements for volunteers which will update the current policy, scope any assurance issues and agree activity to address, clarify roles and responsibilities and set out monitoring arrangements. Recommendations for the revised approach will be submitted to the next DBS Group meeting.

4 Conclusion

- 4.1 The actions taken to date to address the issues raised in the audit report have put the Council in a much better position with regard to its ability to comply with DBS requirements. This has provided assurance to Internal Audit over the management of risks but also to SMT and Strategic Directors that arrangements in their areas of responsibility have been strengthened. The subsequent actions that are currently being addressed will further build on this.
- 4.2 Bringing the counter-signatories together with HR and the Shared Service Centre Operations manager has in itself been positive, has enabled a greater understanding of what the issues are and has provided assurance that this activity is completed on a timely basis and is coordinated effectively.
- 4.3 The DBS Group continues to meet quarterly and provides assurance updates to SMT. The Group is focusing on assurance as well as emerging issues, providing a regular forum for cross Council review and assurance.