

Management Action Plan from the In-House Foster Care (RB19 2015) internal audit report dated June 2015

Risk Areas identified by Internal Audit

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| 1. Risk Register. There is no risk register for the Fostering Service. Interviews with managers identified risks that were not recorded on the SCS risk register such as foster carer retention, placement sufficiency and failure to meet statutory requirements. There are other risks that we identified during the course of the audit such as failure to maintain DBS checks and inappropriate payments that equally were not recorded. | | | | |
| | Comments and Management Action Required | Delivery Lead | When to be completed by | Progress to date |
| | Risks identified by the Internal Audit team included the risk that not enough Kent foster placements would be in place to meet identified demand for foster care from the children in care population. This is a risk recognized at length in Kent's Sufficiency Strategy, a statutory document that forms part of our Annex A Ofsted required information at the point of inspection. This risk is also a national risk not specific to Kent, and in fact, Kent has above average proportions of its child in care population placed with in house foster carers. Specialist Children's Services consider that the risks identified and addressed through the audit are addressed. | | | Work has been done to maintain an effective strategy to ensure sufficient foster carers are responsive to current and predicted future demands on the service. The Newton Europe Transformation has been very successful in the West and is rolling out across the other areas. Well above target (86%) of in-house placements achieved in June 2015. Risks to Fostering and other services are regularly discussed at Directorate and Divisional Risk meetings, and documented in Business Plans. |
| 2. Data Quality and Record Keeping. Inconsistencies with record keeping and data quality were noted throughout the audit. | | | | |
| | Comments and Management Action Required | Delivery Lead | When to be completed by | Progress to date |
| | The service accepts that current information on some files requires improvement, but this is in part due to having recorded information across 3 systems until very recently. These systems include Liberi, the children's social care electronic recording system which the fostering service has only recently started using, paper files and the G Drive. Liberi | Geoff Gurney, Interim Assistant Director for Corporate Parenting | June 2015 | We have developed an online tool for auditing Foster Carer cases. And this will be implemented during July 2015. Anything that can be should be put on Liberi, |

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| has historically not been able to store scanned documents but is now able to do so, eliminating the need for any other recording systems and leading to improved data quality and record keeping. | | | and this is being monitored. |
| 3. Training. Although there is a programme of core training, there is no central monitoring in place to record completion of this. Training should be assessed as part of the carer's Annual Review, and the majority of reviews sampled stated this had been done. There is a risk to the safety and well-being of the child if carers do not receive appropriate training. There is also a risk of non-compliance with the Fostering Service (England) Regulations and the National Minimum Standards. | | | |
| Comments and Management Action Required | Delivery Lead | When to be completed by | Progress to date |
| Records of training attendance by foster carers have historically been kept on their own files although each area has used spreadsheets to understand training attendance for their own carers. As stated above training records are now kept on Liberi which facilitates analysis of training uptake. Undertaking a training needs analysis for foster carers and redesigning the training programme accordingly is a priority for 2015. | Geoff Gurney, Interim Assistant Director for Corporate Parenting | 30 th June 2015 | We have implemented a system of central management oversight to ensure that this is captured and reviewed robustly. We will ensure that where appropriate both carers undertake training and that the Quality Assurance function of the Fostering Panel is more rigorously applied. |
| 4. Regulatory and practice compliance. There is a risk of lack of compliance with the Fostering Service (England) Regulations and the National Minimum Standards. There is the risk of a less favourable Ofsted report if these requirements cannot be demonstrated as met. Inadequate support for carers may result in poor standards of care or disengagement. The Foster Carers category may no longer be suitable which could lead to inappropriate standards of care or in failure to maximum the use of resources. | | | |
| Comments and Management Action Required | Delivery Lead | When to be completed by | Progress to date |
| The fieldwork was undertaken at a point when we were in the process of implementing the Fostering Improvement Plan. | Geoff Gurney, Interim Assistant Director for Corporate Parenting | | We are currently developing an online tool for auditing Foster Carer cases and a revised performance management framework is now in place. There have been gaps in supervision, however this has been improving with the use of the tracking tools and is now monitored weekly. Our position as of |

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| | <p>It is acknowledged that there is insufficient feedback from children and their social workers incorporated into the Annual Review of carers. This is a priority for service development for 2015.</p> <p>Fostercarer agreements will be updated at annual reviews and resigned, although this is not a statutory requirement.</p> | | 30 th June 2015 | <p>February 2015 was that 6 weekly supervision was up to date in over 90% of cases. Supervision is now tracked using the weekly performance monitoring tool by managers, so there should not be any carers who are not receiving supervision.</p> <p>Participation Strategy signed off by the Divisional Managers Team (Assistant Directors and the Director of Specialist Children's Services) in May 2015, and presented to the Children in Care (District) Service Managers in June 2015.</p> |
| <p>5. Complaints and Allegations. There is no complete central record held of complaints and allegations received, either within the Fostering Service or by the SCS Complaints team. There is a risk of lack of compliance with the statutory requirements. There is also the risk that complaints and allegations may not be handled appropriately leading to safeguarding issues or carer disengagement. If central records are not maintained, emerging themes and trends may not be identified and therefore addressed and the Council may not be able to provide accurate records in the event of enquiry or statutory request for information.</p> | | | | |
| | <p>Comments and Management Action Required</p> | <p>Delivery Lead</p> | <p>When to be completed by</p> | <p>Progress to date</p> |
| | <p>The information available is distributed across paper and electronic files. It is clear that recording practice has not been robust in the fostering teams and needs to improve. It does appear that discussions may have been had with the LADO in two out of the three cases, but that this was not recorded anywhere. This is both a recording and a practice problem as it suggests an insufficiently robust approach to addressing allegations alongside lack of recording activity. We will ensure that there is central management oversight of complaints and allegations.</p> | <p>Geoff Gurney, Interim Assistant Director for Corporate Parenting</p> | <p>30th June 2015</p> | <p>The procedures for what to do when an allegation is made against a carer has been updated and is available in Kent's Policy pages, and the LADO team have agreed to attend fostering team meetings to reinforce the requirements of the police which is in line with national minimum standards to refer all allegations made against foster carers to a LADO, and to ensure that copies of the subsequent investigation activity is kept on the carer's file.</p> |

6. DBS Checks – Other members of the household. We could not confirm that there is a robust systematic approach to monitoring, and ensuring completion of, the DBS checks of members of the foster care household who are not main or joint carers. Children may have regular contact with adults who present a risk to their safety.

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| | This may have been the case at the time of the audit work, but is no longer the case. DBS checks for main and link foster carers, and associated adults, are monitored weekly through a tracker on the SCS performance management data site and available to all teams. We will reinforce the performance framework to ensure that DBS clearances are current. | Geoff Gurney, Interim Assistant Director | 30 th June 2015 | All managers are using this tracker to ensure DBS compliance. |

7. Expenses. The rates for mileage and day care were last reviewed in 2009. There is no policy or guidance in place for either staff or carers detailing the expenses that may be claimed, such as journeys, day care or payment in lieu of annual leave. There is also no guidance setting out the expenses that the maintenance grant is expected to cover. The scheme of allowances is costly or inconsistent leading to payments made that do not represent best value for the Council and a failure to meet savings targets. There is also the risk that carers are not treated equally leading to dissatisfaction and disengagement.

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| | It is accepted that the scheme of expenses has not recently been reviewed, and this will be a priority for the Fostering Service to review in 2015. There is guidance. | Geoff Gurney, Interim Assistant Director | July 2015 | Changing the way we pay foster carers has been discussed in consultation with Fostering service managers and with the Kent Foster Carers Association as part of the Transformation (External Spend) programme and as a consequence of a change of payment system, but there are no plans to change the maintenance and reward structure at present. Inconsistencies and some unfairness in the way we pay mileage and some other incidental expenses will be further investigated. |

8. Policies and Procedures. The Service could not provide evidence that the Statement of Purpose (policy) had been signed off by an appropriate Member. The National Minimum Standards require the Council to give contact details for the Independent Reviewing Officer in the Children’s Guide however although the Children’s Guide states that the IRO may be contacted, it does not give relevant details. Policy may not align to strategy. There is a risk to the safety of children placed with foster carers if carers are not clear about the acceptable measures of restraint that may or may not be used, or if children are unclear how to raise concerns. The Council may not be compliant with relevant legislation.

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| | We will ensure the Cabinet Member signs off the current Statement of Purpose. We will ensure contact details for the Independent Reviewing Officers are in the Children’s Guide. | Geoff Gurney, Interim Assistant Director | 30 th June 2015 | Both the Statement of Purpose and the Children’s Guide have been re-written following the recent LILAC team assessment and recommendations. Sign off and publication are pending. |
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