

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

---

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

### 1. Introduction

1.1 As part of the agreed Internal Audit plan we have carried out a review of the Protecting Vulnerable Groups (PVG) scheme arrangements in place within the Council. PVG scheme membership is managed by Disclosure Scotland who enrol scheme members and notify employers where there may be concerns over the appropriateness of employees in regulated work.

1.2 There are two types of regulated work – work with children and work with protected adults. The Council provides a number of services, including social care and education, where membership of the PVG scheme for either type is essential for a high proportion of the workforce.

1.3 The scope of the audit was to ensure there are sufficient and appropriate controls in place for the management of the PVG scheme membership for the Council. The scope of the audit included:

- A review of the Corporate Guidance in relation to the PVG process, ensuring that the requirements of the PVG scheme are clearly outlined.
- Assessing the steps taken by the Council to identify the job roles across Services where PVG rules apply.
- A review of recently recruited posts to ensure that PVG checks have been carried out as expected.

- A review of the processes in place which ensure that action is taken when a change in PVG status takes place.
- A review of the processes in place for the management of PVG requirements for non-permanent staff.

**2(b)**  
16th January 2019

### 2. Audit Opinion

2.1 Based on the audit work carried out a reasonable level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and four recommendations which management should address.

### 3. Main Findings

3.1 We are pleased to report that the key controls are in place and generally operating effectively. Lead signatories, who are responsible for ensuring compliance with PVG scheme arrangements have been assigned to Senior Managers in each Service. Based on our sample, all staff recruited to regulated roles had been enrolled in the PVG scheme and a record of their PVG scheme membership number was retained in their HR record. Similarly, based on our sample all historic posts (i.e. those which pre-existed PVG legislation) which had been defined as regulated roles, were supported by PVG scheme membership and a record of the scheme

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

---

### Title of the Audit: Corporate Review – PVG Scheme Arrangements

- membership number was retained.
- 3.2 However we did identify some opportunities for improvement. Although PVG requirements are included in the Council's recruitment toolkit, regulated work is not clearly defined.
- 3.3 It is the employer's responsibility to ensure that where staff are employed in regulated roles they are enrolled in the PVG membership scheme. We noted that Education Services (ES) had applied this strictly to all school based staff, however Cordia, who supplied school catering services, had not enrolled their staff. We also found that there were inconsistent processes in place for compiling the list of regulated roles within each Service.
- 3.4 Although not documented, all Services were able to articulate the process for handling alerts, which are issued by Disclosure Scotland, when there is a notice of concern against an individual. HR Staff assess each case using their professional judgement however this process could be enhanced further through the creation of documented process flows, roles and responsibilities and communication routes.
- 3.5 Within ES the responsibility for ensuring the suitability of visiting artists is devolved to the Head of Establishment. An additional control exists which prevents these individuals from being paid unless a PVG Scheme membership number is supplied, however this is after they would have visited the school.
- 3.6 An action plan is provided at section four outlining our observations, risks and recommendations. We have made four recommendations for improvement. The priority of each recommendation is:

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

---

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

<b>Priority</b>	<b>Definition</b>	<b>Total</b>
<b>High</b>	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	1
<b>Medium</b>	Less critically important controls absent, not being operated as designed or could be improved.	3
<b>Low</b>	Lower level controls absent, not being operated as designed or could be improved.	0

- 3.7 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.
- 3.8 We would like to thank officers involved in this audit for their cooperation and assistance.
- 3.9 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

### 4. Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Services maintain a list of regulated roles that can be referred to as part of the recruitment process.				
1	<p>One of the six Services (SWS) held a documented list of roles, as specified in the Council's Recruitment Toolkit, which had been assessed as regulated and therefore required PVG scheme membership. The remaining five Services advised that they reviewed each post on its own merit, as part of the recruitment process.</p> <p>Although this is the case we noted that there is no process in place for reviewing staff who change locations whilst in post, which could result in them working with children or protected adults.</p> <p>Without a bank of core posts in place there is an increased risk that staff are recruited to regulated posts which have not been identified as requiring a PVG scheme membership. Furthermore, there is an increased risk that staff move locations as part of their role and the need for PVG scheme membership is not identified.</p>	<p>Where not already in place, Services should put in place a list of key posts which have been assessed as regulated roles. Thereafter this should be referred to when initiating recruitment exercises and where staff change locations.</p>	Medium	<p><b>Response:</b></p> <p>ES – As the majority of posts in Education will be regulated work, this is relatively straightforward to implement.</p> <p>Financial Services (FS) – FS has reviewed their roles and have identified that there are no PVG requirements at this time.</p> <p>Land and Environmental Services (LES) – LES has a detailed list of key posts. The list will be refreshed to ensure that all identified regulated roles are captured.</p> <p>Development and Regeneration Services (DRS) – Service HR (provided by Strategic HR) is responsible for compiling and maintaining the list of regulated roles within the Service. A review will be carried out to determine key posts.</p> <p>Chief Executive's Department (CED) – Accepted</p>

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

---

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

				<p><b>Officer Responsible for Implementation:</b></p> <p>ES – Head of HR (Education) FS – Governance &amp; Risk Manager LES – Assistant HR Manager DRS – Service HR Officer CED – Strategic HR Officer</p> <p><b>Timescale for Implementation:</b></p> <p>ES – 31 December 2018 FS – 31 December 2018 LES – 30 November 2018 DRS – 31 January 2019 CED – 31 January 2019</p>
--	--	--	--	--

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Corporate guidance in relation to PVG scheme requirements has been clearly documented and communicated to managers.				
2	<p>PVG requirements are outlined in the Council's Recruitment Toolkit for each stage of the recruitment process.</p> <p>At a service level, although local documented procedures were not in place within five of the six Services (ES has a Safer Selection Management Circular which outlines Service expectations), relevant staff were able to articulate the process for enrolling and managing PVG scheme members.</p> <p>The Recruitment Toolkit however does not include a definition of the term 'regulated work' and recruiting managers are not sign-posted to national guidance. Having this in place would further enhance the procedures.</p> <p>There is currently an increased risk that recruiting managers fail to identify regulated roles and recruit staff who are unsuitable for regulated work.</p>	<p>Corporate HR should update the Recruitment Toolkit so that it includes a definition of 'regulated work' and should also consider sign-posting recruiting managers to national guidance to enhance their understanding of PVG scheme requirements.</p> <p>Services should also consider whether local documented procedures should be developed for the management of PVG related tasks.</p>	Medium	<p><b>Response:</b></p> <p>ES – ES has 2 Management Circulars (MC16 and MC42) in place, which document the recruitment process and relevant checks. These were reviewed in August, and are awaiting publication.</p> <p>FS – As a result of the review noted in response to recommendation one, we have assessed whether local procedures would enhance the corporate procedures in place and, whilst not applicable at this point, we will monitor for any future requirement.</p> <p>LES – PVG procedures will be documented and issued to relevant Operational Managers for guidance.</p> <p>DRS – DRS Service HR will carry out a review to determine and finalise any required locally documented procedures.</p> <p>SWS – Accepted</p> <p>CED – Accepted</p>

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

---

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

				<p><b>Officer Responsible for Implementation:</b></p> <p>ES – Head of HR (Education) FS – Governance &amp; Risk Manager LES – Assistant HR Manager DRS – Service HR Officer SWS – HR Manager CED – Executive HR Manager (Recruitment Toolkit) and Strategic HR Manager (Local documentation)</p> <p><b>Timescale for Implementation:</b></p> <p>ES – 31 December 2018 FS – 31 December 2018 LES – 31 December 2018 DRS – 31 January 2019 SWS – 31 January 2019 CED – 30 April 2019</p>
--	--	--	--	--

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> New recruits in PVG related roles are required to become members of the PVG scheme or demonstrate that they are already members.				
3	<p>Through discussion with ES we were advised that all establishment based staff under the Service’s responsibility had been enrolled in the PVG scheme, regardless of the role they performed, and therefore admin and secretarial staff were included. It was noted however that school catering staff were not enrolled in the PVG scheme, who at the time of the audit fieldwork were employed by Cordia. However, from October 2018 all Cordia services and staff transferred to Council control, and responsibility for catering staff now lies with DRS.</p> <p>There is therefore a risk that Services which have recently had staff transfer into their department cannot take assurance that all regulated roles have been identified.</p>	<p>Services which are now responsible for former Cordia staff should conduct a review of the posts and ensure that, where regulated work has been identified, staff are enrolled in the PVG scheme.</p>	High	<p><b>Response:</b></p> <p>FS – The transfer of Cordia staff into FS was reviewed to identify any PVG requirements and in line with recommendation one, it was confirmed that there are no PVG requirements at this time.</p> <p>DRS – A review will be conducted to identify those employees in posts that qualify for the PVG scheme.</p> <p>SWS – Accepted</p> <p>CED – Few posts were transferred to CED and these have been reviewed.</p> <p>LES - N/A</p> <p>ES – N/A</p> <p><b>Officer Responsible for Implementation:</b></p> <p>FS – Governance &amp; Risk Manager  DRS – Service Development HR Officer / Strategic HR Officer  SWS – HR Manager  CED – Strategic HR Officer</p>

# GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

## COMMITTEE SUMMARY

---

**Title of the Audit:** Corporate Review – PVG Scheme Arrangements

				<p><b>Timescale for Implementation:</b></p> <p>FS – 31 December 2018          DRS – 31 January 2019          SWS – 31 January 2019          CED – 31 December 2018</p>
<p><b>Key Control:</b> Processes have been defined and are adhered to for the management of staff in non-permanent positions.</p>				
4	<p>Through enquiry we were advised that the Head of Establishment (HoE) is responsible for ensuring that appropriate PVG arrangements are implemented, within educational establishments, for visiting artists and volunteers.</p> <p>An additional control prevents visiting artists from being paid unless a PVG scheme membership number has been provided. However this is after they have been onsite and as such there is an increased risk that PVG scheme membership may not be held. There does not appear to be any additional control in place to ensure all volunteers have been approved by the PVG scheme.</p>	<p>Education Services should review the current PVG arrangements in place for visiting artists and volunteers and determine whether additional controls can be implemented prior to an artist or volunteer coming onsite.</p>	<p><b>Medium</b></p>	<p><b>Response:</b></p> <p>ES – Accepted. ES will engage with FS Customer and Business Services (CBS) to determine what records are available for volunteers who already have a PVG membership, and then determine how this information can be cascaded to establishments.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>ES – Head of HR (Education)</p> <p><b>Timescale for Implementation:</b></p> <p>ES – 31 August 2019</p>