

# Safeguarding review of the Parliamentary Estate

Report on the review of safeguarding processes and procedures within  
the House of Commons Service, House of Lords Administration and the  
Parliamentary Digital Service.

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Final report produced by Julie Dugdale, Head of Business, Barnardo's Training and  
Consultancy, in consultation with Barnardo's Consultants, Linda Richardson and Andy  
Bowly.

## Acknowledgement

Thanks are due to all the individuals and teams, who shared their views and ideas with us during the course of this audit. We are grateful for their co-operation and assistance, and for giving willingly of their time to engage in this audit. Particular thanks are also due to the Deputy Head of Diversity and Inclusion for managing this project and resolving any queries arising throughout the process.

The groups of children and young people, who took time to share their views about their visits to the Houses of Parliament, are also thanked, for providing invaluable feedback.

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## **Glossary<sup>1</sup>**

*Terminology in this area can be complex, and can change as services are reshaped. This glossary sets out what is meant in the document by some key terms at the time of the audit.*

1. The **“Authorities”** means the Corporate Officers of the House of Commons and the House of Lords.
2. The **“Authorities’ Premises”** means lands and buildings which make up the Parliamentary Estate.
3. **“Employee”** of the ‘Authorities means any member of the staff of the Authorities, regardless of their contractual agreement
4. **“Children and young people”** refers to any child up to the age of 18. For ease of reference, only the term ‘children’ is used in this document, but this should be understood to include young people.
5. **“Adults at risk/vulnerable adult”** in this document refer to any person aged 18 years or over, who is deemed to be at risk or in need of support whilst accessing activities provided by the Houses of Parliament.
6. **“Safeguarding”** in this document, refers to the actions taken by adults to protect children and vulnerable adults from abuse or neglect, preventing impairment of their health and development, and ensuring they are safe and free from harm or exploitation.
7. **“Child Protection”** refers to the actions taken by adults to protect children where ‘significant’ harm is known or suspected. What constitutes ‘significant’ depends on a number of factors which must be considered by the Designated Lead within the ‘Authority’.
8. **“Adult Protection”** refers to the actions taken to protect adults where harm is known or suspected. What constitutes harm depends on a number of factors which must be considered by the Designated Lead within the ‘Authority.’
9. The **“Workforce”** refers to any individual who is employed by or works on the Parliamentary Estate in any capacity whether employed, sub contracted, hosted, or on work experience. This includes volunteers.
10. **“Duty of care”** is the duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a child or vulnerable adult involved in any activity, or interaction for which that individual is responsible.<sup>2</sup> Employers also have a **‘duty of care’** to their employees, which means that they should take all steps which are reasonably possible to ensure their health, safety and wellbeing. This includes providing guidance about managing and responding to challenging situations so they can develop safe working practices.
11. An **“Allegation”** refers to information from any source which suggests an adult working for, or on the Parliamentary Estate has harmed or abused a child or vulnerable adult. It is different to a complaint, although this term may be more commonly used by those sharing concerns about an adult’s behaviour.
12. **“Appropriate and proportionate”** refers to the need to take in to account the context and that the nature of the core business when considering what might be suitable action to take.

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<sup>1</sup> *These are working definitions created to support the day to day practice across the Parliamentary Estate.*

## Executive Summary

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Safeguarding children and vulnerable adults and protecting them from harm is everyone's responsibility, and all organisations that come into contact with the public have an important role to play in addressing these responsibilities. Like all other organisations and establishments, Parliament recognises its duty to ensure that all its activities and functions, is discharged with regard to the need to safeguard and promote the welfare of children and vulnerable adults. The Houses of Parliament take these responsibilities seriously and hence commissioned this independent audit to ensure a robust and independent review of their safeguarding arrangements.

The opening in July 2015, of the Education Centre involved significant increases in the numbers of children and adults visiting the Palace of Westminster. This was seen as a timely opportunity to carry out a review of the safeguarding policies, procedures and processes already in place across the Parliamentary Estate. Following due process, Barnardo's was commissioned to undertake this work between June and October 2015. This is the first time the Houses of Parliament have commissioned an audit of this nature.

A team of Reviewers undertook this work including Julie Dugdale, Head of Business for Barnardo's Training and Consultancy and Barnardo's Consultants Linda Richardson and Andy Bowly. The Reviewers were mindful about the need to give careful consideration to what might constitute appropriate and proportionate arrangements, taking in to account the fact that safeguarding is not the core business of the House of Commons and the House of Lords, but is integral to its functioning, its management of risks and its reputational management.

The following aspects were taken into account whilst undertaking the audit: -

- the effectiveness of the overall safeguarding systems and the various safeguarding arrangements already put in place;
- the safeguarding aspects of activities offered to the public;
- the targeted activity carried out to safeguard vulnerable groups of children and adults, and
- The identification of and response to child /adult protection concerns.

A series of individual interviews and focus groups were held with staff, who are involved in undertaking a wide range of duties both on and off the Parliamentary Estate. The reviewers ensured that those employees, who work directly with the general public, as well as those in management positions, were both consulted. All staff co-operated fully with the audit and were keen to understand how improvements might be made to their safeguarding arrangements. In addition a number of children and young people who visited the Estate were also consulted about the extent to which they enjoyed their visits and felt safe throughout their time on the Estate. In addition, any relevant existing procedures and other documentation relating to safeguarding policies and practice was also requested. All the information from the interviews, focus groups, children's questionnaires and existing policy and procedural documentation, was then analysed and key findings identified.

A number of recommendations were then made to improve practice and procedures in accordance with the findings. These are summarised below.

**Recommendation 1:** *The ‘authorities’ identify designated safeguarding leads for the House of Commons and the House of Lords and champions across the Parliamentary Estate.*

**Recommendation 2:** *The ‘authorities’ establish a senior management safeguarding board to discuss and address all safeguarding issues which impact on visitors and staff.*

**Recommendation 3:** *A safeguarding policy statement is produced for public display and is widely disseminated across the workforce.*

**Recommendation 4:** *A safeguarding policy is produced and widely disseminated across the existing workforce and issued to all new recruits.*

**Recommendation 5:** *Where appropriate, existing relevant associated policy documents are amended to include references to safeguarding.*

**Recommendation 6:** *Safeguarding procedures are produced to advise staff what to do in specific situations when concerns arise about the safety and well-being of others.*

**Recommendation 7:** *Every employee must be made aware of their safeguarding responsibilities and contracts should include reference to the post holder’s safeguarding responsibilities.*

**Recommendation 8:** *The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.*

**Recommendation 9:** *Clearer guidance should be produced around safe working practice in specific common situations.*

**Recommendation 10:** *A safeguarding training strategy should be produced, which recognises the training needs of staff with different roles and responsibilities across the Parliamentary Estate.*

**Recommendation 11:** *A standard clause should be included in the staff handbooks for both Houses and in the contracts for external contractors, highlighting the safeguarding statement and the expectations that all those working on the Estate should be expected to comply with the safeguarding policy.*

**Recommendation 12:** *A safeguarding audit template should be produced for future use and this audit repeated in 12 months’ time. N.B. A template has been provided for future reviews.*

*N.B. Barnardo’s understands that Parliamentary exclusive cognisance may affect how safeguarding procedures are developed and are applied in practice. The House Authorities will need to ensure they explore practical working arrangements with the Police and with the Local Safeguarding Children Board for Hammersmith& Fulham, Kensington and Chelsea, and Westminster, and the Safeguarding Adults Executive Board for the London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea, and Westminster City Council.*

## 1. Introduction

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- 1.1. Many organisations have previously viewed safeguarding as commensurate with child protection but over recent years, there has been a discernible shift to a wider view of safeguarding and of the role of public services in promoting the welfare of children and vulnerable adults. In this document, the term ‘safeguarding’ refers to:

*‘the actions taken by adults to protect children and vulnerable adults from abuse or neglect, preventing impairment of their health and development, and ensuring they are safe and free from harm or exploitation’.*

- 1.2. Adopting this wider definition, this report looks at arrangements for safeguarding children and vulnerable adults across the House of Commons Service, the House of Lords Administration and the Parliamentary Digital Service in four key areas:
- The effectiveness of the overall safeguarding systems and the various safeguarding arrangements already put in place;
  - the safeguarding aspects of activities offered to the public;
  - the targeted activity carried out to safeguard vulnerable groups of children and adults, and
  - The identification of and response to child /adult protection concerns.
- 1.3. The report highlights those areas where improvements are recommended and assesses to what extent the activities that take place on and around the Estate are delivered in ways that are appropriate and proportionate.

## 2. The Contract and Terms of Reference

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- 2.1. The responsibility to safeguard and promote the welfare of children and vulnerable adults applies to those working in the Palace of Westminster and on behalf of the House of Commons Service and House of Lords Administration. In recognition of this, the Corporate Officers of the House of Commons and the House of Lords, commissioned a robust audit and review of its safeguarding processes and procedures. Following due process, Barnardo’s Training and Consultancy was awarded the contract to undertake this work.
- 2.2. Barnardo’s Training & Consultancy is an established and well recognised provider of training, and consultancy. With substantial experience in undertaking safeguarding audits, developing safeguarding policies and training staff, Barnardo’s has successfully worked for providers in the private, public and voluntary sector. Commissioners include the Home Office, Refugee Action, British Transport Police, the Historic Royal Palaces, numerous children’s services, voluntary organisations and the social care workforce.
- 2.3. Initial meetings to agree the detail and confirm formal aspects of the contract took place in April and May 2015, under the auspices of Director General, Andrew Walker.
- 2.4. The Deputy Head of Diversity and Inclusion, was appointed as Project Manager to liaise with Julie Dugdale, Head of Business Barnardo’s Training and Consultancy, who took responsibility for managing this review and completing the audit along with

Barnardo's Consultants Linda Richardson and Andy Bowly, both of whom have extensive experience in this area of work.

### **Terms of reference**

In the terms of reference it was recognised that the Authorities have statutory and non-statutory responsibilities in relation to safeguarding and protecting children and protecting adults at risk/vulnerable adults. Barnardo's was appointed to audit and review performance against these responsibilities in relation to the employees and employees of contractors, sub-contractors and agencies in relation to the House of Commons, House of Lords and the Parliamentary Digital Service. It was agreed that there would be a report back to the Authorities on its findings in stage one of the audit, and that in stage 2 new policies would be developed as appropriate.

It was agreed that in undertaking this review Barnardo's would seek to ensure:

- Suitable and appropriate safeguarding arrangements are in place regarding child protection and the protection of adults at risk of significant harm;
- Arrangements are in place to promote the welfare of children and young people;
- Existing policies and procedures were reviewed across the House of Commons, the House of Lords, the Parliamentary Digital Services and other areas as agreed between the Parties;
- The information obtained from the work and the expertise of the Contractor would be used to develop or update safeguarding policies as appropriate.

The work undertaken in stage 1 of the review culminated in this report and the recommendations outlined within it. Similarly the range of documentation accessed is also outlined in the terms of reference.

In undertaking this work Barnardo's agreed that any safeguarding concerns arising during completion of this work will be addressed in line with an agreed Communications and reporting protocol, whereby any safeguarding concerns which arose during the course of the work would be reported in accordance with the agreed reporting protocol.

## **3. The Approach used**

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3.1. The audit was undertaken in two stages. A consultative approach was used throughout, seeking to understand the issues from the perspective of the staff involved in recognising, responding to, reporting and managing safeguarding concerns, which might arise. All of the data gathered was then reviewed and analysed to consider the current position against expectations of good practice.

3.2. In the first stage, the Barnardo's team held a series of interviews or conversations with Heads of Service and individuals with key responsibilities for operational activity, and focus groups with staff who held various roles involving work with the general public. These conversations were important in that they allowed the review team to understand the various activities and functions from both strategic and operational perspectives. Information gained through these meetings helped highlight which documents were relevant to be accessed by the reviewers.



- 3.3. The conversations with frontline staff also allowed the review team to explore some 'what if' scenarios' and this allowed a realistic picture to emerge of what procedures were in place and where additional guidance would be helpful to those involved in delivering activities. The reviewers also observed some key activities and joined several tours involving both adults and children, thus gaining a useful insight into some of the challenges and issues, which could emerge in practice from a safeguarding perspective.
- 3.4. In total the review team spoke with over 70 staff members, accessed a range of documentation, and observed several different activities which took place during the period under review. This report is presented in October 2015 at the conclusion of Stage 1 of the work and includes the findings and recommendations for action.
- 3.5. Stage 2 took place between October and November 2015 and involved the design of a draft overarching safeguarding policy. Stage 2 of the work also required consideration of how the training needs arising from the review could best be met. A training strategy has been developed at the same time as producing this report.

## 4. The Context

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- 4.1. Overall, the review team found examples of some excellent practice, this being driven less by procedural requirements and more by a strong commitment of all the staff, who without exception, appeared to be consistently committed to delivering a safe and high quality experience to all members of the general public, with whom they interacted. The team of reviewers were impressed by the commitment demonstrated by all those spoken to, to ensure the highest quality of provision at all times. Furthermore all of the staff groups which were consulted were extremely co-operative, and readily prioritised their engagement in the audit process. They willingly shared examples of how they managed practice issues they were presented with, and showed they were keen to receive further training, advice and guidance.
- 4.2. One particular example, which demonstrates the aptitude of staff to use their initiative and respond sensitively, is when a child or vulnerable person goes missing on the Estate. This is not a frequent occurrence, as tours are well managed with regular checking points, but staff were able to give a clear and coherent account of how they would sensitively and safely manage that incident despite there being no specific procedures to guide their actions.
- 4.3. The staff and contractors spoken to are to be commended for their enthusiasm and commitment to their work and their willingness to co-operate with and engage in the schedule organised as part of the audit. Many staff were able to reflect on current processes and offer valuable insights into how existing practices could be improved to ensure the safety and well-being of children and vulnerable adults. All staff seemed to be acutely aware of the importance of security and reputational risks, acknowledged the need for greater clarity in terms of safeguarding arrangements, and indicated they would welcome updated policies, procedures and any training which might be deemed appropriate following this audit.

- 4.4. The culture was one of openness and transparency, with a high level of curiosity about how best to deliver activities and safeguard children and vulnerable adults. Attitudes were reflective of a strong commitment to provide the highest quality in customer service through all activities. The review team also found the culture in the new Education Centre to be open and receptive to learning, aspiring to continuously improve as the centre expands its service provision.
- 4.5. The review team observed that the processes already in place to support Equality and Diversity principles and practice, appear to be well established within the House of Commons, and may provide a model for how a parallel safeguarding framework could be developed. There are also examples of good efforts in policy and procedure developments to address various challenges, for example the development and implementation of the 'Respect' policy in the House of Commons, and the creation of guidance about Working with Young People.
- 4.6. The review team were encouraged by the co-operation of all the individuals who offered their thoughts and views, especially in relation to the 'What if' scenarios, which were tested out in discussions. The scenarios explored and the contributions of those consulted, along with the review team's own observations, have enabled the findings and recommendations in this report to be made.
- 4.7. Addressing safeguarding issues is a vitally important, yet arduous task. For those organisations whose core business does not centre on work with children and vulnerable adults, the need to be mindful of risks and safeguards, can sometimes appear overzealous and disproportionate. However, everyone who comes into contact with children and vulnerable adults has a role to play in keeping them safe and ensuring that their own actions and those of others are respectful, well-meaning and not open to misinterpretation. The need for such a proportionate response appeared to be well understood by all staff.

## 5. The Findings

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The findings have been summarised under 10 headings. The headings are:

- 1) Policies and Procedures
- 2) Leadership and Management in Safeguarding
- 3) Recruitment and Selection procedures
- 4) Procedures regarding the management of allegations against staff
- 5) Safe Practice and expected codes of behaviour
- 6) Training and Development of staff
- 7) Working with Children and Vulnerable adults
- 8) Communication and Information sharing *including record keeping*
- 9) Contracts with External Parties including contractors, interns, work experience students
- 10) Internal and External Audits

In relation to each of the above elements a summary is provided as to why this is an important aspect, what was found in relation to it and any recommendations considered necessary to ensure improvements are made where appropriate.

## 5.1. Policies and Procedures

### ***Why this is important:***

External good practice both dictates and highlights the importance of a clear safe organisational framework that includes clear policies and procedures for safeguarding in relation to both children and vulnerable adults. Such policies and procedures demonstrate an organisational culture that is concerned with promoting best practice in accordance with guidance and legislation, as well as providing:

- A framework for all staff to operate in and be confident about their roles and responsibilities in safeguarding
- An ability to audit and monitor practice against compliance within such policies and procedures

### ***What was found:***

Those who participated in the review expressed a need for there to be a single overarching safeguarding policy and clear procedures for all staff and managers. These need to be developed and implemented as a priority. In addition staff requested that information about such procedures be included in their induction and training, in order to feel confident in applying them.

***Safeguarding policy and procedures:*** Within the individual discussions with staff, and within the focus groups, all staff consistently advised the review team that there was an absence of any overarching safeguarding policy or procedures. There was no evidence within the staff handbooks or Procedures accessed of any specific overarching safeguarding policy or procedures, although there were relevant references to safeguarding in various documents including :-

- i. A section in the House of Commons Management Guidance Working with Young People, entitled "Child Protection", which advises staff to report any concerns about significant harm or risk to a student, to their project manager or school co-ordinator. This guidance has been produced to support supervisors within the House of Commons who are supporting a young person on work experience. It appears only to be used for this purpose where work experience placements have been organised by the House of Commons. There are, however, numerous routes through which young people might access work experience on the Parliamentary Estate, yet this guidance was not used more widely. This reference to child protection in the 'House of Commons Management Guide: Working with Young People:' is not cross referenced to any formal policy or procedure.
- ii. Within the House of Commons Staff Handbooks there is a procedure entitled "Safeguarding Children and Vulnerable Adults," i.e. section 10 in the staff handbook. This, however, relates to safer recruitment and is in need of update as it refers to staff undergoing enhanced Criminal Records Bureau checks but not DBS Checks. The staff handbook also includes sections on various relevant safeguarding matters e.g. conduct, the reporting of criminal offences and disclosure of malpractice. However these references are dispersed within the Handbook and various existing procedures; there is no single safeguarding policy or procedures.

- iii. Within the Education Centre’s “Safer System of Work Policy,” there is a detailed risk assessment, which includes various risks related to safeguarding such as children going missing, slips/trips, and exposure to inappropriate behaviour by an adult. There is a need to include specific references to the management of safeguarding and child protection concerns. Information given to schools contains details regarding health and safety emergency plans; information on the new safeguarding policy once developed, should also be included. An incident report form is in place relating to such matters as complaints, behaviour, inappropriate activity and notable occurrences; again information on safeguarding concerns arising should also be specifically named in this incident report form.

Beside these specific references there was evidence of some good practice in relation to contractors own policies; i.e. London Apprenticeship Company, who host apprentices, and the Metropolitan Police, who provide security. However, the standard contract does not include a statement specifying the Houses of Parliament are a safeguarding body and clearly demonstrating the expectation that any sub-contractors must adhere to the safeguarding arrangements.

**Safeguarding Code of Conduct:** With regard to safe working practice, there was no specific overarching safeguarding code of conduct; staff expressed views that they would welcome and value such guidance, to refer to in their day to day work. Again some useful references were found in some documents as follows, but these were not universally applied to all Parliamentary staff, i.e. all persons working, on and off the Parliamentary Estate. The existing procedures are not sufficiently comprehensive, nor specific enough in guiding staff on safeguarding matters. For example:-

- i. There is a section on “Appropriate Behaviour” in the ‘House of Commons Management Guide: Working with Young People:’ drafted to provide guidance to those working with young people on work experience. This advises staff to treat young people with the same consideration and respect they would show any other employee and refers to the Houses’ Valuing Others policy. It also provides a few tips about avoiding physical contact, being mindful of different backgrounds and being sensitive to the fact they may well be nervous. This document is only applied in situations where work experience has been arranged through the office within the House of Commons, which deals with work experience applications. As explained previously young people may gain the opportunity to undertake work experience through a variety of routes, e.g. direct approach to an MP.
- ii. The Valuing Others Policy refers to the right of everyone to be able to work in a positive environment free from unacceptable behaviours, such as discrimination, harassment, bullying, and victimisation. It does not refer to safeguarding. It does however relate to “alleged harassment of bullying by House staff in relation to other House staff.”
- iii. The Complaints process refers to actions to be taken if a complaint is against a member of staff; again this does not refer to safeguarding concerns or allegations against staff regarding inappropriate behaviour against children or vulnerable adults.

- iv. The Respect Policy, which outlines “what is expected of relationships between House staff and Members and their staff.”
- v. A Safer system of work policy has been developed for the Education and Outreach Services; this does not specifically address safeguarding issues, although some aspects are incorporated within the documentation.
- vi. Chapter 19 of the House of Commons and House of Lords Staff Handbook relates to Disclosing Malpractice or Impropriety (Whistleblowing); this procedure needs to be cross referenced specifically with the duty of care to individuals and the safeguarding responsibilities towards children and vulnerable adults. This procedure on Disclosing Malpractice including ‘whistleblowing’ or reporting ‘allegations against professionals,’ is in need of review to ensure it specifically addresses safeguarding concerns and provides links to any new safeguarding policy or procedures.

Finally, any new policy and procedures will need to be developed with a good appreciation of the many varied aspects of the work of those employed by the House of Commons, House of Lords or the Parliamentary Digital Service, ensuring proportionality is integral to their development; i.e. the core business of those working on the Parliamentary Estate is not working with children and vulnerable adults. A high level simple overarching policy is necessary; this should be brought to the attention of all those working, in whatever capacity, either on behalf of the House of Commons, House of Lords, Parliamentary Digital Service or within the Parliamentary Estate. In addition explicit procedures are necessary regarding the responsibilities to report and record any concerns, as well as supplementary guidance to provide a source of advice for staff when determining how to address safeguarding concerns and differentiating which matters are of such a serious nature, they warrant reporting to external agencies responsible for investigation. Staff expressed a need for such documentation, which would provide clear instruction and guidance so that they could reference this and have a ‘firm foundation’ from which to know ‘what to do,’ should they be concerned about the risk of harm or actual harm to a child or vulnerable person. Staff indicated without exception they would welcome such guidance and training on how to respond, how to report, how to record safeguarding concerns and how to escalate matters when necessary.

***Recommendation 3:*** A safeguarding policy statement is produced for public display and is widely disseminated across the workforce.

***Recommendation 4:*** A safeguarding policy is produced and widely disseminated across the existing workforce and issued to all new recruits.

***Recommendation 5:*** Where appropriate, existing relevant associated policy documents are amended to include references to safeguarding.

***Recommendation 6:*** Safeguarding procedures are produced to advise staff what to do in specific situations when concerns arise about the safety and wellbeing of others.

***Recommendation 8:*** The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.

**Recommendation 9:** *Clearer guidance should be produced around safe working practice in specific common situations.*

## 5.2 Leadership and management in Safeguarding

### **Why this is important:**

Having senior managers at the highest level, acting as champions for safeguarding, reinforces the priority that the organisation gives to this as one of their priority areas of business. A senior manager acting as a champion should influence the organisation and lead the way in:

- making sure that safeguarding is a priority at the highest level within the organisation;
- making a clear statement of the authorities' safeguarding responsibilities;
- regularly discussing and addressing emerging safeguarding issues, and lessons learnt; ensuring that lessons from any incidents are disseminated throughout the organisation;
- ensuring that safeguarding policies and procedures are in place, regularly reviewed and consistently applied with cross-reference to other relevant policies and procedures;
- ensuring that managers and staff have training appropriate to their role and responsibilities; and
- Monitoring the actions of their staff, to ensure that children and vulnerable adults are listened to appropriately and that concerns which have been expressed about their welfare, have been taken seriously and responded to in an appropriate manner.

### **What was found:**

Whilst managers understood their responsibility to report safeguarding concerns and act on these, there was no formal arrangement in place for any particular managers to undertake the role of a designated safeguarding officer.

As there are no senior managers identified as designated safeguarding leads or champions, this means that decisions and actions relating to the welfare and safety of children and vulnerable adults are addressed at the discretion of each individual manager. All managers consulted had a good awareness of their responsibility to act on any reported concerns, but did not necessarily know who to report concerns to. Generally most people responded that they would report any safeguarding concern to their line manager or to HR. However, this presents the risk that even when well-intended and wishing to act appropriately to safeguard a child or vulnerable adult, any individual, be it staff or a line manager, who is seeking advice, may themselves turn to another manager, who rarely deals with such matters and has no more knowledge or understanding about the issue than the person seeking advice from them. Whilst, some of the decisions examined by the review team were proportionate and appropriate, the absence of a designated safeguarding lead or leads means that responses are left to individual managers with no access to support or guidance; this may lead to adverse outcomes and failure to protect a child or vulnerable adult appropriately. Although there was a clear commitment from senior managers to ensure that children and vulnerable adults were safe and well when visiting the Parliamentary Estate, this commitment and the expectations of staff and managers, were not explicitly documented and therefore taking appropriate action relies on

what could be described as “common sense”. This could leave children and vulnerable adults in unsafe situations and could risk allegations of misconduct or abuse. It is in the interests of all concerned to ensure staff have suitable procedures and guidance and can seek and obtain consistent advice when necessary, about what is appropriate behavior and what should be reported.

It is good practice and there are distinct benefits if a senior management safeguarding board is established, whose remit is to oversee safeguarding policies and procedures, and to keep abreast of monitoring safeguarding practice. The review team would suggest that once established the board would need to meet no more than 3 or 4 times year. An external organisation could be asked to advise and support this board in its development, by providing safeguarding knowledge and advice.

**Recommendation 1:** *The ‘authorities’ identify designated safeguarding leads for the House of Commons and the House of Lords and champions across the Parliamentary Estate.*

**Recommendation 2:** *The ‘authorities’ establish a senior management safeguarding board to discuss and address all safeguarding issues which impact on visitors and staff.*

**Recommendation 3:** *A safeguarding statement is produced for public display and is widely disseminated across the workforce.*

**Recommendation 4:** *A safeguarding policy is produced and widely disseminated across the existing workforce and issued to all new recruits.*

**Recommendation 5:** *Where appropriate, existing relevant associated policy documents are amended to include references to safeguarding. These could include:-*

- *Conduct*
- *Disciplinary and performance improvement procedure*
- *Policy on disclosing malpractice*
- *Respect policy*
- *Fraud and bribery policy*
- *Equality and Diversity policy including harassment, bullying and victimisation*
- *Health, safety and well-being policy*

**Recommendation 6:** *Safeguarding procedures are produced to advise staff what to do in specific situations when concerns arise about the safety and wellbeing of others.*

### **5.3 Recruitment and Selection procedures**

***Why this is important:***

It is vital that organisations working with children and vulnerable adults, adopt recruitment and selection procedures and other human resources management processes that help to deter, reject, or identify people who might abuse or harm children or vulnerable adults, or are otherwise unsuited to work with them. Clear guidance is required to assist organisations whose function brings them into contact with children and vulnerable adults to review and, where appropriate, modify their

practice and procedure in ways that will strengthen safeguards for children and vulnerable adults by helping to deter and prevent abuse.

***What was found:***

Recruitment and selection procedures are robust and this would be expected given the nature and context of the work across the Estate. The review team found that in the absence of safeguarding policies and procedures, new employees are not given information about their individual safeguarding responsibilities. Improvements could be made by ensuring all inductees are made aware of their responsibilities through their job descriptions being amended to address this and by being given a copy of the newly proposed safeguarding policy on start up.

It was not clear whether there is a consistent understanding by all relevant managers about when DBS checks are required. There may be a need for clear guidance to ensure that roles which are required to have DBS clearance are clearly identified and appropriate checks are consistently undertaken.

***Recommendation 7:*** *Every employee must be made aware of their safeguarding responsibilities and contracts should include reference to the post holder's safeguarding responsibilities.*

#### **5.4 Procedures regarding the management of allegations against staff**

The procedures for managing allegations against staff should be distinct from the procedures for managing complaints; most staff were not aware of any specific procedures relating to allegations against staff or whistleblowing. What happens when allegations are made needs to be made explicit in terms of information to staff about how to report matters and what should happen once they have been reported. Safeguarding Procedures for whistleblowing and managing allegations against staff need to be developed and disseminated; these should be developed in line with local procedures produced by the Local Safeguarding Children Board for Hammersmith& Fulham, Kensington and Chelsea, and Westminster, and the Safeguarding Adults Executive Board for the London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea, and Westminster City Council. All staff should be made aware of their existence.

***Recommendation 8:*** *The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.*

#### **5.5 Safe Working Practice and expected codes of behaviour**

***Why this is important:***

All adults whose work brings them into contact with children and vulnerable adults have a duty of care to safeguard and promote their welfare, whenever they are in a position to do so. This means that organisations which deliver any form of public service need to ensure that staff, who work with, or alongside children and vulnerable adults, are competent and safe to do so, and know how to conduct themselves appropriately.



***What was found:***

In discussions with staff, it was clear that they were aware of the importance of safe behaviours especially, for example, if they should find themselves in a one to one situation with a child or young person. It was generally acknowledged that these situations do not happen often and when they do it is for an extremely short duration. Examples were shared of visits to the nurse, a parent becoming ill and having to leave a child in the care of a member of staff, or a young person needing to be escorted upstairs to the public gallery.

The review team observed that generally, there was evidence of good safe working practice but this was not underpinned by safeguarding procedures or any specific guidance. Although staff are advised about their code of conduct in the staff handbook, there would be benefit in emphasising the importance of safe behaviours where children and vulnerable adults are concerned and asking staff to sign to acknowledge they accept and understand this requirement. The existing code of conduct could easily be adapted, perhaps with a separate section which specifies the dos and don'ts of safe behaviour.

***Recommendation 8:*** *The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.*

## 5.6 Training and Development of Staff

***Why this is important:***

Training plays an important role in equipping staff to do their job safely and effectively. Staff need to be aware of the organisation's responsibilities towards children and vulnerable adults and know what policies and procedures exist and how these should be applied on a day to day basis. It is important that training is designed and delivered with regard to individual roles and responsibilities and is set within the context, culture and goals of the organisation. It is also important that any training plans are proportionate and take account of the nature of the core responsibilities and are focused on what various post holders need to know to fulfil their safeguarding duties. Employers are responsible for ensuring their employees are confident and competent in carrying out their responsibilities, and for ensuring employees are aware of how to recognise and respond to safeguarding concerns. Employers should also identify adequate resources and support for inter-agency training.

***What was found:***

Both within corporate and departmental induction training and on the 'Learning Management System' (ACT), there was an absence of evidence of any up to date safeguarding training being offered in relation to adults or children. There is, however, clear evidence of a culture in which the importance of on-going learning is valued. The Equality and Diversity training programmes, for example, were mentioned several times during focus groups and individual conversations. There was an acknowledgement, however, that in terms of safeguarding, staff have not previously received training of this nature. The phrases '*I suspect we would probably....*' and '*I think what happens is....*' were used often when discussing specific scenarios; these responses highlighted that training, which should be carefully

designed and role appropriate, would be of considerable benefit to staff. Within the range of individual conversations and focus groups held, the review team identified an overriding need for staff to affirm they were operating safely in what they were doing, and wanting to be reassured that what they were doing was right.

**Recommendation 9:** *Clearer guidance should be produced around safe working practice in specific common situations.*

**Recommendation 10:** *A safeguarding training strategy should be produced, which recognises the training needs of staff with different roles and responsibilities across the Parliamentary Estate.*

## 5.7 Working with children and vulnerable adults

### **Why this is important:**

Children and young people are more likely to flourish if they are treated with respect, acceptance and honesty by the adults around them. As well as being responsive to a child or vulnerable adult's direct requests for help, staff need to know how to respond and engage with children or vulnerable adults. Judgements on how best to intervene when there are concerns will often, and unavoidably, entail an element of uncertainty; staff would benefit from training and guidance on how best to handle these situations. The issue of when to ask for, and when to undertake risk assessments, was raised several times and there is a need to explore this issue further and ensure guidance is available. There should always be the opportunity to discuss concerns about a child or vulnerable adult's safety and welfare with colleagues, managers, and importantly a designated safeguarding lead.

### **What was found:**

The review team observed staff working and engaging with children of all ages and were impressed by the skills and commitment shown by staff in relation to good communication with them and to engaging with them appropriately. They were able to describe how they would respond to challenges from young people and vulnerable adults, and demonstrated good judgement and sensitivity when dealing with the 'what if' scenarios.

Without exception, staff told the review team they would seek support from their manager or Head of Service if they were concerned about what to do. Where they were less confident, was in knowing how to respond to a child or vulnerable adult who might make a concerning disclosure, or knowing how to respond in the event they observed abusive behaviour. There were differing views expressed about if and when they should intervene and how much they should enquire about the concern before reporting the matter and sharing information.

**Recommendation 8:** *The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.*

**Recommendation 9:** *Clearer guidance should be produced around safe working practice in specific common situations.*

## 5.8 Communication and Information sharing

### ***Why this is important:***

Good practice in communicating and information sharing is essential in all contexts but especially so in relation to the safeguarding agenda. By offering clarity on when and how information can be shared legally and professionally, staff can be confident they are working to clear guidelines. Every person has a right to privacy under the European Convention on Human Rights (Article 8), but if there are worries or doubts about the safety or wellbeing of a child or adult, then a decision has to be made about sharing information.

Sharing information appropriately is key to putting in place effective child and adult safeguarding services. In a similar vein, in order to ensure that a child or adult has a positive and rewarding visit to the Houses of Parliament, there will be times when it will be appropriate for staff to ask for personal information from schools or organisations so they can ensure they can assess risks and respond to any exceptional needs or circumstances.

### ***What was found:***

The review team found evidence of some good practice and it was clear that staff communicate well with each other and shared information appropriately with line managers. There is, however, no formal process for sharing or recording safeguarding concerns and it is essential this issue is addressed. Discussions highlighted the importance of schools and agencies responsible for placing young people on work experience, or on apprenticeships, to be asked to provide additional information in relation to special needs and issues around behaviour. There appear to be inconsistencies in the extent to which such information is obtained currently or shared with supervisors even when obtained. Some examples of good information gathering about such young people were shared but this is no single approach used across the Parliamentary Estate.

***Recommendation 6:*** *Safeguarding procedures are produced to advise staff what to do in specific situations when concerns arise about the safety and well-being of others.*

***Recommendation 8:*** *The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.*

## 5.9 Contracts with External Parties

### ***Why this is important:***

Staff whose work brings them into contact with children and vulnerable adults have to ensure their welfare and protection is always at the forefront of their practice. More than ever any action taken in relation to safeguarding concerns is closely scrutinised by the public and media, to ensure that a professional and rigorous approach is always maintained. Having good safeguarding arrangements in place is not just essential for staff, but is also important for any adult whose work brings them onto the Parliamentary Estate, for whatever reason. These adults may for

example be contractors, school staff or MP's. Although not directly employed, the Estate has a responsibility to ensure that these adults whomever they are, are informed about the safeguarding policy and understand they are expected to play their part in recognising and adhering to this policy commitment.

***What was found:***

The review team found that the expectations relating to the safeguarding responsibilities of adults who are not employees but who work on the Estate, e.g. Contractors, school staff, research assistants, are currently not made explicit. Examples were given of school staff not providing appropriate information about individual children and their health needs, or of assuming that when they arrived for a tour, the Tour Guides or Visitor's Assistants would assume responsibility for the group.

***Recommendation 2:*** *The 'authorities' establish a senior management safeguarding board to discuss and address all safeguarding issues which impact on visitors and staff.*

***Recommendation 11:*** *A standard clause should be included in the staff handbooks for both Houses and in the contracts for external contractors, highlighting the safeguarding statement and the expectations that all those working on the Estate should be expected to comply with the safeguarding policy. (This includes those organisations which place apprentices at the Houses of Parliament.)*

## 5.10 Internal and External Audits

***Why this is important:***

Organisation whose functions bring them into contact with children and vulnerable adults should undertake safeguarding audits at least every two years. These internal audits should achieve two objectives: firstly that their functions are properly and effectively discharged having regard to the need to safeguard and promote the welfare of children and vulnerable adults, and secondly, that the 'services' they contract out or offer to others are provided having regard to that need.

***What was found:***

There have been no previous safeguarding audits and this is the first to be undertaken. The format and style of this report could be adapted and used by the board to review and inspect safeguarding procedures in future. Given there are a significant number of actions to be taken at this stage, it is recommended that the next audit takes place in twelve months' time to ensure all recommendations have been addressed.

***Recommendation 12:*** *A safeguarding audit template should be produced for future use and this audit repeated in 12 months' time. N.B. A template has been provided for future reviews.*

## 6 Children's views

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- 6.1 Children's views were sought as part of this audit to ascertain their perspective about how safe they felt and how much they enjoyed their visits to the Parliamentary Estate. A questionnaire was designed and disseminated to several groups of children visiting the Education Centre for pre-arranged tours. The findings from these questionnaires have been aggregated and organised as the views of children from the following two age groups:-
- a) Children and young people aged 16 to 18
  - b) Children aged 9 to 11.
- 6.2 It is clear from these findings that children had an overwhelmingly positive experience during their visits, felt safe and enjoyed them considerably. Issues which were raised which would improve the experience further would be to ensure water is available to children and to ensure opportunities for resting and/or sitting are offered at intervals.
- 6.3 Younger children made numerous comments about the high level of security, and for some children the experience of armed police made them feel safe, whilst for others it made them feel nervous or scared. The responses given show however that the approach of the Police and Security Officers was generally very well managed and for the largest majority of children was a positive experience and they understood the need for such security. Older children were less perturbed at the presence of armed police and the feedback from younger children show that whilst many may have frequently passed through airport security, many others had not experienced such control before.
- 6.4 The feedback from children about their teaching session and tour was also extremely positive with over 90% of children and young people giving scores indicative of a rating of over 70%. These results are very impressive and show that children currently visiting the Estate and engaging with the Education Centre have an excellent experience.
- 6.5 These extremely positive results are a credit to all staff involved, responsible for Security, the Tours and the teaching sessions in the Education Centre.

## 7 Concluding Comments

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- 7.1 **The effectiveness of the overall safeguarding systems and the various safeguarding arrangements currently in place.** Whilst there are some relevant policies and procedures, these only apply to certain staff in certain contexts and there is a need for a single overarching safeguarding policy, and accompanying procedures, universally applied to all staff.
- 7.2 **The safeguarding aspects of the activities provided to the public.** The review team observed that staff provide excellent activities and aspire to provide the very best customer care. These good intentions could be better supported through the provision of guidance and training to staff, as well as through the development and dissemination of safeguarding policies and procedures.
- 7.3 **The targeted activity carried out to safeguard vulnerable groups of children and adults.** Risk assessments and information for schools are already in place. These could be improved by including safeguarding as a specific consideration.
- 7.4 **The identification of and response to child /adult protection.** During the course of this audit the reviewers explored whether there had been any concerns which had arisen over the last two years, which had warranted reporting to the authorities responsible for child and adult protection; no such matters were recalled, although staff did describe some minor issues which had occurred and involved them taking action to safeguard children or vulnerable adults. These appear to have been managed well in all instances and staff demonstrated a good knowledge and understanding of the skills and approach needed to safeguard children and adults who might be at risk.
- 7.5 **Strengths:-** The culture and practice are good and there is a strong commitment to safeguard children and vulnerable adults; this provides an excellent basis on which to develop a more structured approach and establish a clear safeguarding framework to support the safeguarding agenda. Establishing safeguarding policy, procedures and relevant reporting systems will strengthen this basis further and ensure greater risk management and accountability. Similarly there was a high regard for the need to be mindful about reputational risks and ensure good and safe management of any matter which might jeopardise reputation or security; this includes the management of safeguarding concerns.
- 7.6 Barnardo's understands that Parliamentary exclusive cognisance may affect how safeguarding procedures are developed and are applied in practice. The House Authorities will need to ensure they explore practical working arrangements with the Police and with the Local Safeguarding Children Board for Hammersmith & Fulham, Kensington and Chelsea, and Westminster, and the Safeguarding Adults Executive Board for the London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea, and Westminster City Council. Other local safeguarding boards may need to be engaged where outreach activities are involved.

## 8 Recommendations

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The following key recommendations have been made:-

**Recommendation 1:** *The 'authorities' identify designated safeguarding leads for the House of Commons and the House of Lords and champions across the Parliamentary Estate.*

**Recommendation 2:** *The 'authorities' establish a senior management safeguarding board to discuss and address all safeguarding issues which impact on visitors and staff.*

**Recommendation 3:** *A safeguarding policy statement is produced for public display and is widely disseminated across the workforce.*

**Recommendation 4:** *A safeguarding policy is produced and widely disseminated across the existing workforce and issued to all new recruits.*

**Recommendation 5:** *Where appropriate, existing relevant associated policy documents are amended to include references to safeguarding.*

**Recommendation 6:** *Safeguarding procedures are produced to advise staff what to do in specific situations when concerns arise about the safety and well-being of others.*

**Recommendation 7:** *Every employee must be made aware of their safeguarding responsibilities and contracts should include reference to the post holder's safeguarding responsibilities.*

**Recommendation 8:** *The procedures for managing allegations against staff should be amended and revised; the revised procedures should be disseminated to all staff.*

**Recommendation 9:** *Clearer guidance should be produced around safe working practice in specific common situations.*

**Recommendation 10:** *A safeguarding training strategy should be produced, which recognises the training needs of staff with different roles and responsibilities across the Parliamentary Estate.*

**Recommendation 11:** *A standard clause should be included in the staff handbooks for both Houses and in the contracts for external contractors, highlighting the safeguarding statement and the expectations that all those working on the Estate should be expected to comply with the safeguarding policy.*

**Recommendation 12:** *A safeguarding audit template should be produced for future use and this audit repeated in 12 months' time. N.B. A template has been provided for future reviews.*