



## Risk Details

Risk Code	Risk	Responsible Officer	Committee	Last Reviewed	Issue Type	Risk Treatment	Current Risk Score	Target Risk Score	Eff. of Control
SR13	<b>Not keeping adults safe from harm and abuse</b>	Executive Director Health and Adult Social Care Rob Persey	Adult Social Care Public Health Sub-Committee	26/10/23	Threat	Treat	 L4 x I4	 L3 x I4	Future - Adequate,

### Causes

- The council has a duty to keep adults, for whom they have statutory responsibility for, safe from harm and abuse. Brighton & Hove City Council has a statutory duty to co-ordinate safeguarding work across the city and the Safeguarding Adults Board. This work links partnerships across the Police and Health and Social Care providers.
- Under the Care Act, since 2015, the Local Authority has a statutory duty to enquire, or cause others to enquire, if it believes a person with care and support needs is experiencing or is at risk of harm and abuse and cannot protect themselves.
- There has been an increase in safeguarding concerns received, increase in complexity of adult social care packages and unknown demand in the context of Covid-19 recovery
- There is not enough appropriate accommodation and services in the city for those with significant and complex needs or specific needs such as ABI, Physical Disability, Learning Disability or Mental Health
- Due to workforce shortages in the domiciliary care market, challenges to commercial viability and increased pressure for council's responsibility on quality monitoring, there is higher risk of provider failure
- Changes to government legislation and funding, pressures on the health and care system as a whole and pressures on resourcing and budgets across the sector with rising costs in the provider market

### Potential Consequence(s)

- Failure to care for and safeguard adults properly could result in death, abuse, neglect or injury to individuals.
- Failure to meet statutory duties could result in legal challenge and reputational damage to the organisation and public trust
- Inequalities could be created in terms of how disadvantaged groups of our community i.e. multiple and complex needs can access care and support services
- Provider market costs continue to rise which could lead to overspend of budget to meet statutory responsibility
- Service users may need to move out of the city to receive services required
- People are placed in inappropriate accommodation which may present a danger or risk to them or others and people may not get the appropriate services and support to address their needs
- Any failure of delivery across the health and care system could impact on costs and pressures throughout the system and frustrate attempts to release efficiency savings and improve system performance.

## Existing Controls

### First Line of Defence: Management Controls

1. Performance management across adult social care enables a more informed view on current activity and planning for future service changes and reviewed monthly by Finance & Performance Board. A BHCC Safeguarding Adults performance dashboard is provided monthly.
2. Directorate Management Team (DMT) oversee developments and monitor risks.
3. Brighton and Hove Safeguarding Adults Board (BHSAB) work plan and multi-agency partnership commitment. Multi agency safeguarding adult procedures are in place, for preventing, identifying, reporting, and enquiring into allegations of harm and abuse, in line with Care Act requirements, endorsed by all 3 Sussex Safeguarding Adults Boards. Front line practitioner and manager events are provided within every Safeguarding Adults Review and our senior management team ensure attendance for reflective and systemic learning and engagement.
4. Dedicated resources for: safeguarding adults S.42 decision making; oversight, specialist advice and guidance of complex people in a position of trust; input into Domestic Homicide multi agency review panel; co-ordination of all Deprivation of Liberty Safeguards (DoLS) referrals in line with statutory requirements; continuous professional development requirements in line with Social Work Professional Capabilities Framework
5. Safeguarding referrals can be made by anyone including other professionals, GPs, Police, neighbours, friends. Safeguarding referrals are assessed by Social Workers.
6. BHCC Quality Monitoring Team oversee process in place to monitor quality of adult social care providers, in partnership with NHS Sussex and Care Quality Commission (CQC), which supports quality and preventative safeguarding objectives. A monthly Service Improvement Panel which is multi agency, meets to discuss emerging themes and preventative responses and is a robust effective risk mitigating factor.
7. A Practice Development Assurance Board is in place and meeting monthly to consider practice development and assurance areas of focus bringing updates from internal partners and data share.
8. Learning from Safeguarding Adult Reviews (SARs), monitored through SARs subgroup of BHSAB and a dedicated post who ensures we are involved in responding, liaising, and prompting other internal partners and in contributing to learning and development within our system. Accessibility to service provision is a key consideration in learning from SAR, systemic change where needed and improvement for adults experiencing risk and disadvantage at the fore of the shared multi agency approach.
9. Homelessness Transformation Programme
10. Housing Allocations Policy review
11. The Health and Wellbeing Strategy is delivering the Joint Strategic Needs Assessment on people with multiple and complex needs as part of its Living Well and Ageing Well Workstreams. The Changing Futures Programme (Sussex wide) is in place with external partners and organisations to consider this area and systemic change, development and training needs to bring the system together to consider development needs in this area.
12. Provider failure business continuity plans are in place
13. Provider partnership working through forums, working groups and partnership boards
14. The CQC Inspection Preparation Group have completed a self-assessment and identify areas to improve assurance and monitor progress.

### Second Line of Defence: Corporate Oversight

1. Pan Sussex Safeguarding Adults procedures group - robust partnership group producing specialist procedural guidance across the Sussex area and protocols and meets quarterly with working groups between to complete multi agency tasks together. Strong multi agency working together is featured

consistently and is Sussex wide so takes a broader view. Protocols and guidance designed and issued is often across the County which provides a stronger collaborative approach.

2. Health & Wellbeing Board oversees Joint Health & Wellbeing Strategy and BHSAB annual report.
3. Adult Social Care & Pub Health Subcommittee oversees effective social care commissioning.
4. Care Governance Board oversees quality monitoring of care services and attended by CQC.
5. Learning Disability Governance Group ensures robust links between directorates for Learning Disabilities services.
6. Service Improvement Panel – with multiagency partners, including NHS Sussex ICB, to share inspection results, complaints, and other issues for care provider quality.
7. Mental Health Oversight Board
8. Housing & New Homes Committee
9. Supported Accommodation Panel
10. Prevent Board
11. Practice Development Assurance Board meets monthly to focus on Social Work Quality Assurance.

#### Third Line of Defence: Independent Assurance

1. For the council's in-house registered care services Care Quality Commission (CQC) Inspections on an on-going regular basis. The CQC have started to assess local authority Adult Social Care and BHCC are preparing for inspection within the next two years.
2. CQC's programme of inspections of all registered care providers are published weekly and available on CQC's website [www.cqc.org.uk](http://www.cqc.org.uk). These are monitored for local relevance by the council's Quality Monitoring team.
3. Brighton & Hove Safeguarding Adults Board (BHSAB) is independently chaired and meets quarterly with the three statutory agencies for city wide safeguarding assurance. The subgroups are consistently attended by HASC. The Head of Adult Safeguarding is a member of the SAR panel (multi agency, chaired by independent sector) where referrals for reviews are discussed in depth and input is provided in a robust manner for all reviews and related pieces of work for example multi agency audits and action plan reviews required by SAB.
4. Internal Audit
  - \* 2023/24: Adult data handling (Reasonable Assurance); Service agreements (Partial Assurance)
  - \* 2022/23: Adult Social Care In-house services (Reasonable Assurance); Direct Payments (follow up) (Partial Assurance); ASC Financial Assessments (Partial Assurance)
  - \* 2021/22: HASC Modernisation Programme (Reasonable Assurance), Home Care (Reasonable Assurance); Care Payments (Reasonable Assurance)

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Ensure that mandatory PREVENT training is embedded in all training induction and development plans within the organisation to support effective identifiers and that the referral pathway is known</p> <p><b>Comments:</b> The Prevent mandatory training had come off the mandatory courses for the BHCC and this has been raised with the senior leadership. In view of the statutory Duty, the Prevent Training will be included back in the mandatory training package, and this will be endorsed at the Prevent Board Meeting on 12/12/2023. HASC already includes Prevent as a mandatory training.</p> <p>Communication from the Prevent Lead Officer has been disseminated across directorates and includes information that will increase awareness of strategic risks of terrorism in the city (CTLP – Counter Terrorism Local Profile headlines), further information for staff members to effectively identify some of those risks (e.g., extreme right wing, incel...), how to make a Prevent referral within the city and local support programme and finally the Prevent training offer.</p> <p>Prevent SPOC (Single Point of Contact or lead) in each directorate have agreed to this approach and it will be monitored through the quarterly Prevent Board meetings. Additionally, the Prevent Lead Officer has been working with FDFP and HASC safeguarding hub to review the Prevent Pathway, the revised procedures will be promoted internally and across directorates once confirmed and will also be available through the directorate SharePoint sites.</p> <p>Future work will include reassuring ourselves that all our commissioned and contracted services are advised of the Prevent Duty and training requirements, and these are monitored through our performance monitoring and quality assurance work.</p>	Nahida Shaikh, Prevent Lead Officer		31/03/24	01/04/21	31/03/24
<p>Ensure there are appropriate services and support for people with care needs in the city</p> <p><b>Comments:</b> There are a number of projects currently underway to recommission a range of services including care homes, supported living, community support, mental health provision and equipment services. Homecare and extra care contracts have been recommissioned and the contract provides a suitable model for the future. Other contracts are due to be recommissioned over the next 18 months. There is specific work being completed to understand the need in the city and engage with key stakeholders. We have recently reviewed feedback from the service user and carers surveys and action plans are being developed. The Authorisation Panel meets once a week and consists of staff across Adult Social Care and the commissioning and assessment teams meet regularly to understand any current gaps in services and where further commissioning activity is required.</p>	Andy Witham, Assistant Director – Commissioning & Partnerships	80	31/03/24	18/11/21	31/03/24

Ensure there is appropriate accommodation and support for vulnerable homeless and rough sleepers Paul Cooper, Assistant Director – Housing Needs & Supply 80 31/03/24 18/11/21 31/03/24

**Comments:** Our Rough Sleeper and Single Homeless Service continues to support vulnerable homeless and rough sleepers across the city. A rough sleeper is defined as someone who is bedded down or about to bed down in the open air or in place that is not designed for habitation (e.g. stairwells, sheds, make shift structures).

As of September 2023 there were 56 verified rough sleepers on the single night count that took place.

Of the 56 people sleeping rough, 26 had a local connection to Brighton & Hove; 7 people had accommodation available to them and 15 were verified as new to rough sleeping that night.

Of the 56 verified rough sleepers counted in September 2023 there were 43 males, 11 females, 2 where gender was unknown.

The current count reflects the seasonal change to the number of rough sleepers, for the summer period. Brighton has historically seen an increase in rough sleepers during the summer months and commissioned Reconnections Services will target those relevant individuals to ensure they are safely reconnected to their previously connected areas.

The Council commissions Street Outreach Services and Off Street accommodation for Rough Sleepers. These services include reconnections services to provide targeted intervention for Rough Sleepers who are not locally connected to Brighton & Hove. Services provide tailored, trauma informed support to enable clients to move away from Rough Sleeping and into supported accommodation.

Accommodation projects aim to ensure recovery from homelessness and engage with Rough Sleepers around their multi compound needs, with the view to move on to independent living. The commissioned services work in close partnership with the Council's Housing Options team to ensure Rough Sleepers receive statutory assessments alongside the support provided.

The Council's additional Government funded (DLUHC) Off Street Offer has been fully mobilised within the quarter and continues to prioritise placements for women which and those with no recourse to public funds. This fund will be in place until March 2025. Both of the Council's Off Street Offers work under a 'Single Service Offer' targeted move on model to ensure quick, targeted interventions for rough sleepers.

RS15 (externally) funded projects operational and being monitored

-Commissioning of single homeless supported accommodation pathway on progress and on track:

- H&NH Committee Member Workshop (Sept23): COMPLETED
- Detailed specifications for future service (Dec23): ON TRACK
- New contracts awarded (Jan24): ON TRACK
- New contracts mobilised (April24): ON TRACK

High quality social work is provided to ensure that adults are effectively safeguarded Richard Cattell, Principal Social Worker 80 31/03/24 18/11/21 31/03/24

**Comments:** In January 2023, HASC introduced a new practice audit framework which enables evaluation of the quality of Social Work practice in relation to 8 practice principles wellbeing, keeping safe, proportionality, partnership, accountability, prevention, carers and planning support. Although the principles are interdependent components of high quality social work, the “keeping safe” and “wellbeing” principles are most relevant but not exclusive to effective safeguarding.

To date, 69 audits have been completed covering a wide range of practice from all HASC operational services.

Audits are graded as either good, satisfactory, requires improvement or inadequate.

In the period since January 2023

1. In relation to the ‘Wellbeing’ principle 80% audits were rated as either good or satisfactory and 20% were rated as requiring improvement or inadequate
2. In relation to the ‘Keeping Safe’ principle 77% audits were rated as either good or satisfactory and 23% were rated as requiring improvement or inadequate.
3. In relation to the overall rating of all audits, 83% audits were rated as either good or satisfactory and 17% were rated as requiring improvement or inadequate with a proportion requiring some level of management follow up action to ensure practice improvement or system/process change.

The Adults Principal Social Worker

- Has introduced additional practice tools to support the assessment of risk in safeguarding and care act assessment
- Provides a quarterly update to the DMT on emergent themes from practice audits.
- Is developing a practice improvement plan ( based on practice quality themes from audit) to ensure that gaps in practice are adressed through additional learning and skills development.

Provide assurance and support to reduce the risk of provider failure in the city Andy Witham, Assistant Director – Commissioning & Partnerships 100 31/03/24 18/11/21 31/03/24

**Comments:** Provider failure plans have been updated. Alongside this continued governance arrangements are in place through the use of incident management meetings and the role of our public health and quality monitoring and commissioning teams to support providers both in terms of covid related activity and ongoing provider quality issues. The Care Governance Board also provides strategic oversight of quality and provider failure issues jointly with health partners and regulators of services.

Provide assurance of safeguarding adults arrangements across the council and with our partners	Katherine Taylor-Birnie, Head of Safeguarding	85	31/03/24	01/04/21	31/03/24
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**Comments:** Risk Response Actions:

1. Ensure meaningful learning across the directorates and with our partners from Safeguarding Adults Reviews, Domestic Homicide Reviews, Coroners inquests and case reviews

80% completed. All work of the BHSAB continues with the Local Authority lead statutory partner. A peer challenge event has been completed in December. The James SAR (ABI) action plan which was a challenge for agency partners is now complete and has fed into system development work such as ABI pathway development (ICB) and the Changing Futures Steering Group. SAR Craig (compound risk) action planning stage has now been completed with HASC able to provide robust evidence of assurance across all areas required The thematic review (women with multiple compound needs) action planning has also been completed. A new SAR is being commissioned around transitions and safeguarding. All challenges and action plans are met with Local Authority engagement and increased input from the operational area is supporting the SAB workplan and tasks well. Local system development continues to respond to these SAR's and overall themes (transitional safeguarding benchmarking for transitions steering group, consideration of risk management frameworks and approaches, enhanced learning regarding cuckooing theme) Evidence for SAR response is clear and timely. Updates for HASC directorate are fed back to the Operational Management Team and Directors Management Team regularly to ensure internal oversight and engagement.

The Directorate has developed an internal safeguarding development meeting led the Principal Social Worker and attended by Head of Adult Safeguarding, Social Work Practice Managers and now Operational Managers on a monthly basis and therefore increased oversight regarding practice is ongoing. % Safeguarding outcomes met continues as a directorate KPI which is monitored by the Performance Team and Head of Adult Safeguarding with engagement from front line teams a key aspect to this measure and consistently high performance (80%+). Engagement actions with all operational front line social work teams are being completed by the Head of Adult Safeguarding and improvements to the eclipse database are actions which are being brought in to enhance the reporting and accuracy of this data and its narrative.

2. Provide Assurance that recognising reporting and responding to abuse and neglect is embedded and that safeguarding training (appropriate to role and task) is being provided to staff across the organisation and offered to partners

60% completed. Ongoing monitoring of uptake of safeguarding training is in place within the organisation and continues to be offered to all staff in applicable roles, and to partners, for example causing others training and basic awareness, with refreshers offered proactively by workforce development for front line assessment social work staff.

3. Ensure effective partnership working across directorates and with external partners to deliver a robust supportive and safe process for the Ukrainian Refugee Hosting Scheme

100% completed. HASC have actively supported since the development and design of new processes, working with all partners to support the scheme and meet local authority responsibilities, including where potential risk issues Safeguarding input is now invited by exception as and when needed and concerns are signposted to our operational area without delay.

Provide assurance that there is a comprehensive clear Disclosure and Barring Service (DBS) check and recheck process in place which reduces risk to the organisation and to the community

Jenny Holmes, Recruitment Manager 75

31/03/25 01/04/21 31/03/24

**Comments:** DBS checking for new starters is up-to-date and in place. BHCC policy is to recheck staff in roles that require an enhanced DBS check every three years. This currently has a backlog due to staff sickness. A process is in place to address this.