



**NHS England London Region
Clinical Commissioning Group (CCG)
Safeguarding Deep Dive 2015/16 Report**



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Introduction

The Health and Social Care Act 2012 created Clinical Commissioning Groups as membership organisations of GP practices in order to promote the clinical leadership and local ownership of the way that health services are commissioned and delivered.

NHS England has a statutory duty to conduct performance assessment of each CCG, conducted through the assurance process. This involves formal assurance reviews carried out quarterly in line with the published framework and technical guidance, which includes a number of domains of assurance that reflect planning guidance.

As outlined in the document Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework (NHS England 2015) safeguarding is a fundamental element of commissioning and therefore, is an area that forms a core part of the commissioning assurance process.

Between October 2015 and January 2016 NHS England (London Region) conducted a deep dive review into the 32 CCG's safeguarding governance, arrangements and processes. The aim of the deep dive process was to gain an understanding on how well safeguarding principles have been embedded into wider components of the CCG assurance framework. It also provided NHS England (London Region) with an overview on the safety of the commissioning system across London and how to best tailor support to CCGs going forward.

The deep dive considered:

- How the CCG carries out their operational safeguarding functions within their work streams.
- How the CCGs work streams are coordinated together, what controls are in place to review and manage performance (including escalation).

- What processes are in place to ensure the CCG is sighted, and prepared to manage, future developments within safeguarding.
- How the CCG works in partnership with key partners and the systems in place for oversight of all of these areas.

The safeguarding deep dive review components focused on the following domains;

- **Governance /Systems/ Processes**
- **Workforce**
- **Capacity levels in CCG**
- **Assurance**

Each domain set out a number of key areas that were reviewed utilising the following CCG assurance categories:

Assured as outstanding:

CCG can demonstrate that it is continuing to perform well across all components of assurance. It may have some identified challenges but is proactively managed.

Assured as good:

There are minor concerns with the performance of the CCG but overall the CCG is well led and in good organisational health, or if a CCG has a higher level of risk this is managed effectively.

Limited assurance:

CCG requires improvement and has serious, persistent and chronic performance or financial challenges and it may not demonstrate the capability of capacity to manage the associated risk to make sustained improvement on its own.

Not assured:

NHS England is satisfied that a CCG is failing or is at risk of failing to discharge its functions.

For each domain an overall outcome assurance category was awarded. This was based on the averages of scoring within each section. To support the process NHS England (London Region) developed a CCG Safeguarding Deep Dive Benchmark Review Document can be found in Appendix 1.

Accordingly, through the assurance process the level of support to CCG is then identified. This ranges from none required; some support may be required for specific issues, extensive from a range of provider option to formally being directed by NHS England.

The Process

A letter detailing the process was sent to each CCG Chief Officer. In addition a letter was sent to all Safeguarding Adult/Children Board Chairs to allow them an opportunity to provide feedback with regards to the CCGs involvement in the safeguarding board.

Initially in seeking assurance NHS England (London Region) utilised information that was readily available. This included; Section 11 audits, the Safeguarding Adults Board Self-Assessment Audit, Safeguarding Workforce Gap analysis and baseline review, serious untoward incidents and section 2 audits and the safeguarding adults review and SCR tracker for adults and children.

Following the desk top review of existing information held by NHS England. CCGs were invited to provide further evidence in response to of how they assured themselves against a key number of areas. Additional evidence submitted by the CCG was reviewed by the Safeguarding Team in preparation for the individual feedback meeting with the CCG.

A feedback meeting was held with each CCG, each meeting was tailored to the individual CCG in attendance. The meeting was chaired by a Director of Nursing with representation from the Safeguarding Team and/or representation from the Medical Directorate /Assurance

team from NHS England (London Region). CCGs were advised that representation of the relevant senior staff that could provide the detail and assurance regarding the relevant areas of practice was required at the meeting.

Outcome/Findings

The safeguarding deep dive review components focused on the following areas;

- Governance /Systems/ Processes
- Workforce
- Capacity levels in CCG
- Assurance

Governance, systems and processes

The areas that were tested were:

- Having in place an Operating Plan that covers the key areas
- Clear line of accountability in CCG governance arrangements
- Evidence of safeguarding at governing body meetings
- Clear strategy that takes account of children, adults and is aligned to the relevant safeguarding board (children or adult)
- Clear policy for adult and children safeguarding that includes Prevent, Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM)
- Effective interagency working
- Effective information sharing
- Effective system for responding to abuse and neglect
- Evidence of learning and engaging in Serious Case Review, Safeguarding Adults Reviews and Domestic Homicide Reviews
- CCG has undertaken the safeguarding adult board audit and engaged in section 11 audits

- There is evidence that the CCG progressed recommendation from the audits
- As an overall rating, all CCG were assured as being good in the way they integrated safeguarding system within the wider CCG governance structure.

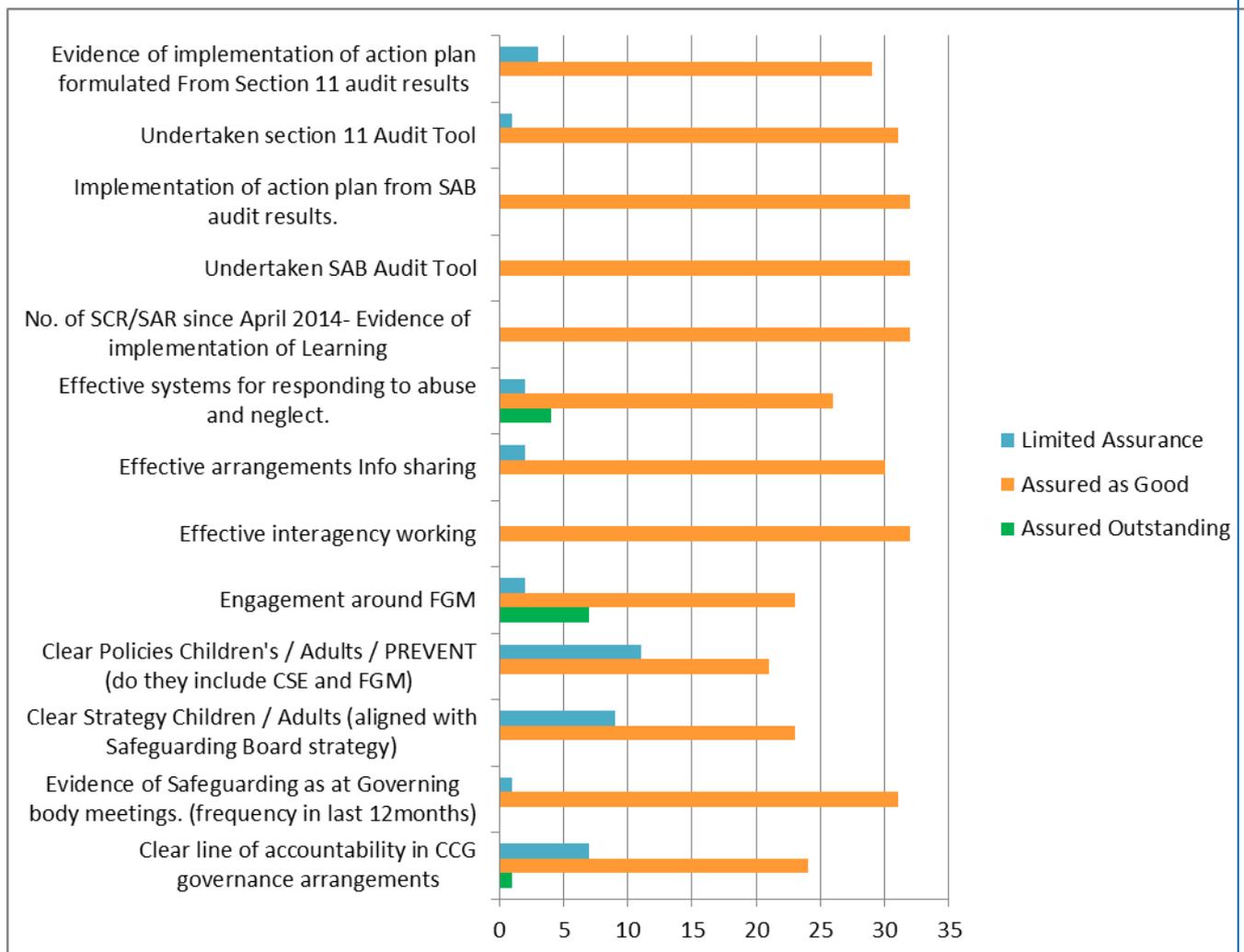
Findings

As an overall rating, all CCGs were assured as being good in the way they integrated the safeguarding system within the wider CCG governance structure.

The area where most CCG's were assured as outstanding were in 'engagement of Female Genital Mutilation (FGM)', where 21% (n~7) were given this scoring. This was followed by having 'effective system in place for responding to abuse and neglect, where 12 % achieved outstanding assurance.

The area where the most CCG's provided limited assurance was in 'having in place clear children and adult policies that make sufficient references to Prevent, FGM and Child Sexual Exploitation (CSE)'. Here 37% of CCGs were judged as needing to make improvements, a number of CCG's did have policies developed but they were still in draft format, therefore a rating of limited assurance was given. Not having in place children and adult strategies that are aligned to the relevant safeguarding children or adult board also meant that 28% of CCGs only provided limited assurance to NHS England. Finally, in 21% of CCGs their Operating Plan did not cover the area of children and or adult safeguarding sufficiently to be assured as good.

The one area where all CCG were assured as good was in their effective interagency and partnership working across children and adult safeguarding.



Good Practice

Operations Plan (does it cover key areas)	
Southwark CCG	NHS Southwark Clinical Commissioning Group has launched a new mobile and online service to help local people to understand where they should go for treatment, especially when they need healthcare in a hurry, late at night, or at the weekend. The Health Help Now app helps people check their symptoms and find the best place for treatment – showing which nearby services are open.

Lewisham CCG	CCG identified work in progress to employ a Primary Care Adult Safeguarding Nurse instead of a Named G.P for Adult Safeguarding to support general practice and primary care (draft Job Description & business case). This role will support training about domestic violence sourced via IRIS.
Brent CCG	Learning Disability Register: Excellent health check figures, G.P clinical lead in place that works closely with the learning disability service to ratify register and ensure individuals are assessed for a learning disability.
Barking and Dagenham CCG Havering CCG Redbridge CCG	Quality and Safeguarding Team has a database (KloE Tracker) which records early warning indicators from a variety of sources such as Clinical Quality and Risk Management Meetings, SI Panels, and incidents reported via the CCG Incident reporting mechanism, contractual performance meetings and external guidance such as NICE, CAS Alerts and NHS England advice.
City and Hackney CCG	CCG working with Tower Hamlets and Newham CCGs has developed a new continuing care quality framework with the CSU which provides a systematic approach to quality monitoring and includes a range of metrics and measures relevant to safeguarding adults and children with user feedback included. This covers MCA and DoLS training. This will ensure early warning of quality concerns and systematic approach to address these.

Waltham Forest CCG	<p>Think Family Approach</p> <p>The think family approach and good practice guidance is being developed jointly led by Waltham Forest Safeguarding Children's Board and Safeguarding Adults Board. Think Family: It is practitioners from all services working together and in partnership with all members of the family (including intergenerational/all adult families) to ensure they receive the right support at the right time in a joined up way.</p>
Clear Policies Children's / Adults / PREVENT	
Lewisham CCG	<p>Excellent Children and Adult Safeguarding in commissioning policy in draft form features FGM / CSE / Prevent.</p> <p>http://www.lewishamccg.nhs.uk/news-publications/Policies/Pages/default.aspx</p>
Engagement around FGM	
Croydon CCG	<p>Excellent pathway developed and Risk Assessment tool based on Department of Health tool.</p>
Sutton CCG	<p>CCG is using policy / practice group chaired by the CCG deputy Chair to further develop work. CCG has a work plan for LAC and a resource identified due in post in January. CCG has a named GP with sexual health experience supporting the work.</p>
Hammersmith and Fulham CCG	<p>FGM project in place, scoping for midwifery led team clinic. Information sharing guidance for FGM in place.</p>

Ealing	Ealing has had an FGM service for over 5 years. There is open access to the service and does not require going to other professionals. Women can arrive from all over the country. Majority of women self-refer to the FGM clinic service.
Effective systems for responding to abuse and neglect.	
Barking and Dagenham CCG Havering CCG Redbridge CCG	Quality and Safeguarding Team has a database (KloE Tracker) which records early warning indicators from a variety of sources such as CQRMs, SI Panels, and incidents reported via the CCG Incident reporting mechanism, contractual performance meetings and external guidance such as NICE, CAS Alerts and NHS England advice.
Haringey CCG	With Haringey local authority, The Early Help Service has been launched. Haringey's Early Help Localities Team and Targeted Response Team provide direct and practical support to families facing multiple and/ or complex issues, to address needs at an earlier stage and prevent issues from escalating.
City and Hackney CCG	CCG has funded an innovative new post to support MARAC. Following recent Domestic Homicide Reviews in City & Hackney, it was apparent that there is a lack of a communication flow to and from the Multi-Agency Risk Assessment Conference (MARAC) and GPs, which may have a negative impact on the aim to reduce domestic violence and protect those at high risk of domestic violence (Domestic Violence) and abuse. This nurse led service aims to address this gap and ensure a safer plan for victims of abuse as well as ensuring

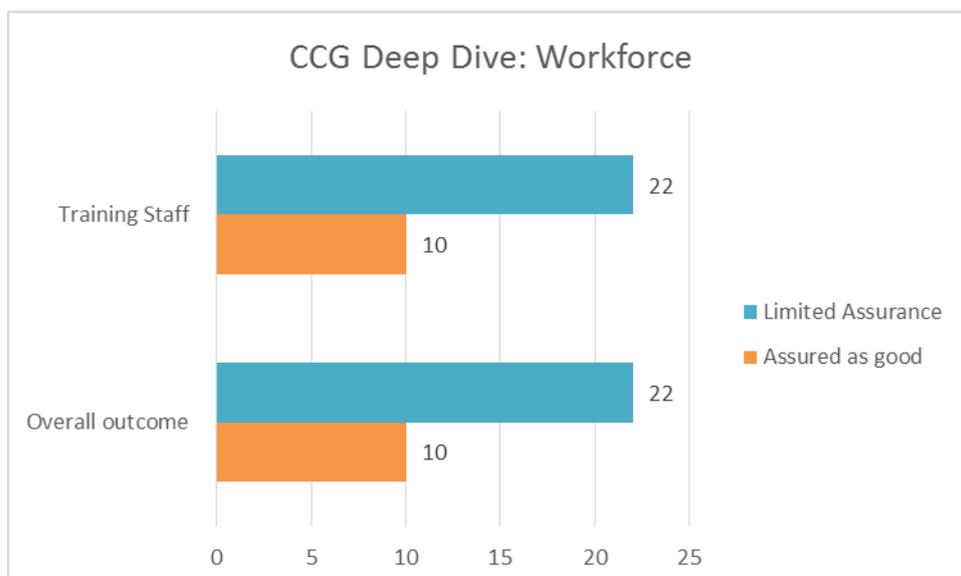
	that the GP is aware of both the risks and the safety plan agreed at the conference.
Feedback from Safeguarding Board	
Barking and Dagenham CCG Redbridge CCG	SAB Chairs present at meeting

Workforce

This area focused on the Safeguarding and Prevent training figures for CCGs and NHS Providers located within the CCG area boundaries.

Findings

Overall the CCGs performed well in delivering safeguarding and prevent training within their organisation, however 22 of the 32 CCGs were rated limited assurance for providers failing to meet the appropriate compliance levels for safeguarding training.



Good Practice

Croydon CCG	Monitoring of training level in services including Non NHS services.
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Capacity in CCG to lead

This area looked at how well staffed the CCG was in order to provide strategic and operational leadership across its organisation and the local health economy. The specific questions related to:

Safeguarding Children	Safeguarding Adults
<ul style="list-style-type: none">• Governing Body Lead• Designated LAC Doctor• Designated LAC Nurse• Designated Nurse• Designated Doctor. No of hours.• Named GP• Appropriate Supervision for safeguarding leads.	<ul style="list-style-type: none">• Governing Body Lead• Designated Adults Safeguarding Manager Lead• Named G.P Adult• MCA Lead• PREVENT Lead• Appropriate Supervision for safeguarding leads.

Findings

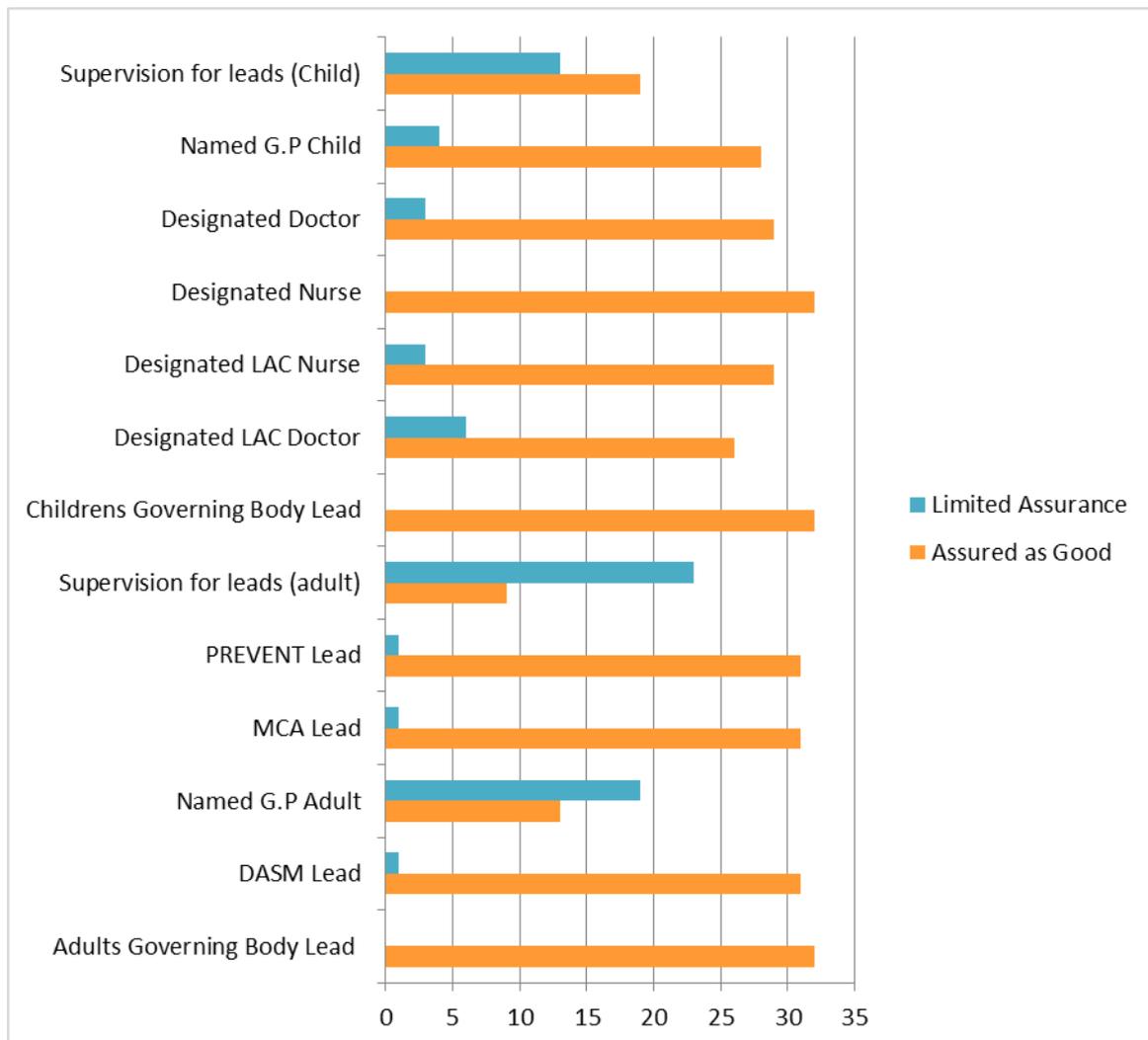
Overall 29 of the 32 CCGs were assured as good for the overall outcome of this domain.

Appropriate supervision for safeguarding leads was identified as an issue in 71% of organisations. Given the complexity of the work and the sometimes multiple portfolio that people have to manage this requires strategic attention across London.

59% of CCG did not have a Named GP for adult safeguarding in place. Given the importance on improving capability within primary care this is also an area that could do with further improvement.

It is positive to see that all CCGs had a governing body executive lead for safeguarding and this was supported by a DASM, Prevent and Mental Capacity Lead in role in 97% of organisations. Further questioning may be required to understand if these portfolios are held within one position and the limitation and potential benefits that this may bring.

Issues were also identified for some CCGs around the recruitment of Designated LAC doctors and Named G.P's for children.



Good Practice

Supervision for leads	
Lewisham CCG	Excellent draft supervision policy in place due to be signed off in January 2016. Assured as Outstanding post sign off.

Assurance and Oversight

This outcome ascertained what assurance and surveillance of risk the CCG has put into place to monitor quality and safeguarding across the local health economy. The key line of inquiries was around:

- Evidence that safeguarding was being discussed at CCG Clinical Quality and Risk Management Meetings (CQRM)
- Whether safeguarding was integrated into the CCG assurance framework
- CCG demonstrating a grip on provider performance, aligned to CQC inspections and outcomes
- Evidence of mental capacity work such as undertaking audits
- CCG gathering feedback and experience relating to safeguarding
- Risk register and appropriate escalation regarding provider concerns

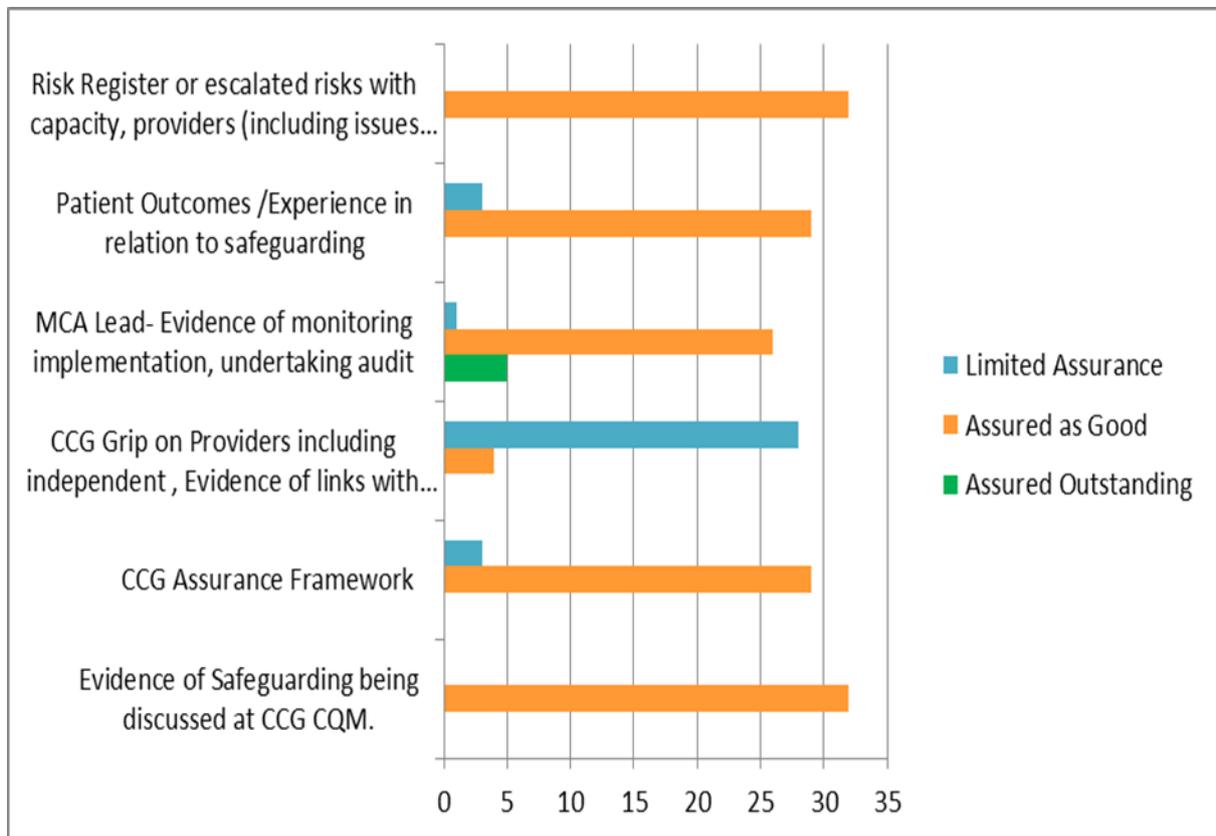
Findings

Overall, 96% of CCG were assured as being good within this domain, with only one CCG being identified as needing improvement.

The two areas KLOE where all CCGs were rated as good was around having in place risk registers and escalation processes and also evidence that safeguarding was part of their the Clinical Quality Review Meetings. Furthermore, the two standards where 90% of CCG achieved a rating of good were around embedding safeguarding into the wider assurance frameworks and also to seek feedback and gather experience in relation to safeguarding.

The area KLOE where the most CCGs being assured as outstanding were in the work around the MCA, here 15% of CCG achieved the scoring. However, a very high number of CCG also were rated as having limited assurance in place here (78%).

Maybe not surprisingly given the high number of contracted services, via Continuing Healthcare and other mechanisms, there is a real issue across London in having robust systems in place that correlates CQC inspection with own contract function in order to have a firm grip on Providers. 90% of CCG were rated as having limited assurance in place; this was mainly due to CCG's grip on independent providers in their area.



Good Practice

CCG Grip on Providers including independent , Evidence of links with CQC and systems in place to receive reports/alerts	
Lewisham CCG	CCG is currently leading the Risk Summit process for an independent CCG commissioned hospital provider.
Wandsworth CCG	CCG placed a turnaround team into a failing nursing home to improve quality.
Harrow CCG	Good Quality Framework for Undertaking Provider Assurance Clinical Visits
MCA Lead- Evidence of monitoring implementation, undertaking audit	
Ealing/Hammersmith and Fulham/Hounslow CCGs	<p>Commissioned Buckingham University to carry out the following:</p> <ul style="list-style-type: none"> - Patient experience. Nursing care providers have been engaged in work. - Video learning from care workers. - What does good practice in MCA look like? <p>Commissioned North West London University for a project around the hydration of residents in nursing homes.</p> <p>Application to Imperial Partnership to measure quality in care homes to gain funding and develop a metrics.</p>

Croydon CCG	Mental Capacity Act and Deprivation of Liberty Framework in place.
Haringey , Enfield and Barnet CCGs	<p>Quality Nurse currently undertaking audit in care homes in compliance with MCA and DoLS in care homes.</p> <p>Barnet, Enfield and Haringey CCGs have jointly developed an MCA and DoLS Care Homes Policy to ensure constancy of MCA and DoLS application across boroughs. Currently ratified for Pan London roll out.</p> <p>MCA and DoLS bespoke training delivered to 30 Acute and Care Home staff outcome of training in the below evaluation.</p> <p>MCA bespoke training and MCA audit disseminated to GPs in Haringey to strengthen implementation of MCA and to check compliance with legislation.</p> <p>91 GPs and Practice staff received trained across Barnet, Enfield and Haringey. The evaluation report stated they found the course very relevant to their role and appreciated the focus on application to practice.</p>
Patient Outcomes /Experience in relation to safeguarding	
Wandsworth CCG	The Signs of Safety and Wellbeing Approach for children.

London Wide Results



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Overall Comments

Overall, NHS England (London Region) found the safeguarding deep dive process an incredibly useful stocktake on how well safeguarding principles have been embedded into wider components of the CCG assurance framework across London. The exercise highlighted the good progress made by CCGs since the initial authorisation process and identified any gaps that NHS England can assist with supporting CCGs going forward.

Feedback at the CCGs individual meetings regarding the process was generally very positive with a number citing that it has encouraged them to focus on what systems and process for safeguarding are in place.

Learning

CCGs reported that it would have been helpful if the process was completed over a longer time period, particularly for the CCG's to respond to the requested key lines of enquiry. The feedback provided by Safeguarding Adult and Children Board Chairs was of immense value to the process as was having two chairs attend the CCG's individual meeting. If NHS England (London Region) repeated the exercise, inviting the safeguarding board chairs to the individual CCG's meeting should be considered to add value to the process.

Areas for Improvement to be considered for 16/17 Work plan

- Areas of limited assurance will be followed up as part of the assurance process.
- NHS England will attend Safeguarding Boards in areas where CCG's with two or more areas of Limited Assurance in overall outcome.
- CCG's with two or more areas of Limited Assurance in overall outcome will be asked to provide an update on progress within six months.
- NHS England (London Region) is commissioning guidance for appropriate supervision models for safeguarding.
- NHS England London Region will facilitate the development of good practice guidance around the monitoring of independent providers.
- The development of a safeguarding adult named GP training and network.
- NHS England (London Region) to support the development of Model of Assurance for Non NHS Providers.

Appendix 1

CCG Safeguarding Deep Dive Benchmark Review Document

	SGA Deep Dive review areas		Outcome: Assured as Good
Area Adult /Child	Governance /Systems/ Processes		
Both	Ops Plan (does it cover key areas)	<p>Systems in place to ensure that service quality is monitored and safeguarding alerts / concerns are identified and lessons learnt put into practice, both within care settings and within domiciliary services.</p> <p>CCG reported undertaking or undertaken a review of LD services and addressing any outcomes of the review.</p> <p>CCG has a review system in place in the light of major investigations, e.g.; Francis, Saville, and has an implementation plan against which progress is evidenced.</p> <p>CCG identifying individuals with Learning Disabilities that are at risk of hospital admission to support admission avoidance where suitable.</p> <p>Operational plan meets the requirements of the Accountability and Assurance Framework for protecting vulnerable people (adults and children) Including incorporating the Care Act, MCA recommendations and Prevent.</p> <p>In planning for service transformation, there are systems and supports in place to ensure services are designed with the patient at the centre and safeguarding is part of routine service monitoring.</p>	

		CCGs Operating Plan evidences safeguarding being considered across the plan.
Both	Clear line of accountability in CCG governance arrangements	Clear line of accountability in CCG governance arrangements in relation to roles and responsibilities, reporting for safeguarding and clear line of accountability.
Both	Evidence of Safeguarding as at Governing body meetings. (frequency in last 12months)	Annual Reports and Minutes from the Adults and Children's Safeguarding boards are shared at Governing Body meetings, specific and relevant issues are discussed at Governing Body meetings. Safeguarding forms a substantive item at Governing Body Meetings at minimum annually.
Both	Clear Strategy Children / Adults	CCG strategy in place for safeguarding children and adults. If there is not a specific strategy for safeguarding, safeguarding is featured in the CCG'S Quality Strategy/Work streams.
Both	Clear Policies Children's / Adults / PREVENT (do they include CSE and FGM)	Safeguarding policies in place, featuring PREVENT, FGM and CSE with evidence that these are refreshed in light of new statutory and other requirements.
Both	Engagement around FGM	Local working group in place Training and awareness raising taking place.
Both	Effective interagency working	The CCG is represented at the LSCB/ SAB and relevant sub-groups. Minutes are shared with the relevant CCG subcommittee or at the Governing Body. CCG has oversight of provider engagement with the LSCB/SAB

		<p>The CCG engages appropriately in multiagency work to prevent and intervene in safeguarding concerns as evidenced by attendance at strategy meetings/case conferences. The CCG will also have oversight of attendance by other providers such a primary care and works with primary care to look at local resolutions for attendance.</p> <p>The SAB/SCB representative reports back to the right level in the organisation ensuring that the broader organisation engages with the partnership and its objectives.</p> <p>Children’s CCG evidences commitment to supporting health engagement with the local MASH. Evidence that the CCG has supporting processes to engage GPs.</p> <p>Adults CCG evidences its engagement and transparency with the partnership in safeguarding adults: It engages appropriately in multiagency efforts to prevent and intervene in safeguarding concerns as (attendance at strategy meetings/case conferences/Channel Panels and finding effective outcomes);</p>
Both	Effective arrangements Info sharing	The CCG has effective policy/ procedure/guidance setting out clearly the process and principles relating to sharing information across all relevant agencies across adult and children safeguarding, relevant to the local area, and this is consistent with the legislation.
Both	Effective systems for responding to abuse and neglect.	<p>Commissioners working together to assure themselves of the quality and safety of the organisations they place contracts with and with organisations within their borough via:</p> <ul style="list-style-type: none"> - Implementation of quality assurance monitoring. - Robust risk identification and risk management processes to prevent concerns escalating. - Oversight on safeguarding concerns raised. - Opportunity to reflect on lessons learned and implements change to prevent further abuse from reoccurring.
Both	No. of SCR/SAR since April 2014- Evidence of	Evidences that action plans from Safeguarding Adult Reviews (SARs/SCRs) and Domestic Homicide Reviews (DHRs) nationally and locally drive improvement internally and across the partnership. There is evidence that

	implementation of Learning	internal action plans/learning (e.g. from Serious Incidents, SARs, DHRs and complaints) are shared across partner agencies and with the Governing Body to facilitate learning across the partnership. This will include triangulation of data that will inform decision making Evidence that lessons are learnt and embedded into practice.
Adult	Undertaken SAB Audit Tool	Evidence that the audit undertaken.
Adult	Evidence of implementation of action plan formulated From SAB audit results.	Clear Action plan being progressed.
Child	Undertaken section 11 Audit Tool (providers and where undertaken CCG)	Oversight of all providers section 1 reports 2 yearly with oversight within that 2 year frame that the development plan resolves areas of weakness i.e. training etc. CCG section11 undertaken identifying where learning and improvement is required within the commissioning arena.
Child	Evidence of implementation of action plan formulated From Section 11 audit results	Clear Action plans monitored, progressed and supported by the CCG.
Workforce		
Both	Training Staff (% achievement 14/15, current status) 1.CCG 2. Providers	Staffs have been identified for the appropriate level of training. 1. CCG Safeguarding Children Level 1 80% Level 2 80%

		<p>Level 3 80%</p> <p>Safeguarding Adults: 80%</p> <p>Prevent : CCG is on track to meet compliance standard of 100% by 2018</p> <p>2. Provider Safeguarding Children Level 1 80% Level 2 80% Level 3 80%</p> <p>Safeguarding Adults: 80%</p> <p>Prevent: Provider is on track to meet compliance standard of 100% by 2018</p>
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Capacity levels in CCG

Adults All posts are filled and at appropriate capacity for CCG needs

Adult	Governing Body Lead
Adult	DASM Lead
Adult	Named G.P Adult – good practice. Evidence that the work of the named GP is managed within the CCG.
Adult	MCA Lead

Adult	PREVENT Lead	
Adult	CCG supervision policy that described the supervision model, across the borough, which can be evidences as implemented and takes into account commissioning relationships and is evidenced.	
Children	All posts are filled and at appropriate capacity for CCG needs	
Child	Governing Body Lead	
Child	Designated LAC Doctor	
Child	Designated LAC Nurse	
Child	Designated Nurse	
Child	Designated Doctor No of hrs.	
Child	Named GP	
Child	CCG supervision policy that described the supervision model, across the borough, which can be evidences as implemented and takes into account commissioning relationships and is evidenced.	
Assurance		
Both	Safeguarding being discussed at CCG CQM	Evidence provided of Safeguarding being a substantive discussion at CCG CQM at minimum quarterly.
Both	CCG Assurance Framework	CCG Assurance Framework in place specifically for safeguarding or includes safeguarding.

Both	<p><u>CCG Grip on Providers including independent sector, primary care. Evidence of links with CQC and systems in place to receive reports/alerts from CQC</u></p> <ul style="list-style-type: none"> • CCG has clear quality assurance processes in place for NHS Providers including KPIs and /or performance dashboard. • Assurance processes in place with Independent providers. • CCG has oversight on all services providing healthcare provision in within CCG boundaries. • Evidence of links with CQC and systems in place to receive reports/alerts from CQC. • Evidence of joint working with the Local Authority around provider monitoring and sharing intelligence. • Assurance processes in place with primary care for CCGs with Level 3 responsibilities. For CCGs with level 2 commissioning – evidence that they are working towards this. • Evidence of systems to monitor out of area placements for LAC and CHC.
Adult	<p><u>MCA Lead- Evidence of monitoring implementation, undertaking audit does it include care homes and domiciliary care?</u></p> <ul style="list-style-type: none"> • Mental Capacity (including DoLs) is included in contract monitoring including care homes and domiciliary care. • Collect evidence from providers that show they are fully compliant with the MCA. • Evidence of audit being undertaken in relation to compliance and implementation of MCA.
Both	<p><u>Patient Outcomes /Experience in relation to safeguarding</u></p> <ul style="list-style-type: none"> • CCG is actively engaging with Making Safeguarding Personal Agenda. • Patient feedback /outcomes is gathered and utilised to shape service provision.

Both	<u>Risk Register or escalated risks with capacity, providers (including issues and concerns that NHSE may support)</u> <ul style="list-style-type: none">• The CCG identified the current risks they are faced with in relation to safeguarding.• Identified risks have clear mitigating actions and timeframes.

