# INDEPENDENT REVIEWING OFFICER ANNUAL REPORT 2014/15



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#### 1. Purpose of report

In order for the aspirations and expectations for Children in our Care and Care Leavers to be realised, it is important that Scrutiny Committee and the Corporate Parenting Panel responsible for achieving them receives regular reports that set out progress. The annual Independent Reviewing Officer (IRO) report is part of that process.

An annual report of the Independent Reviewing (IRO) Service for looked after children is required in accordance with the Children and Young Person's Act 2008 and subsequent statutory guidance published by the Department for Children Schools and Families in 2010( The IRO Handbook)

This report is to be presented to the Director for Children Services, Lead Member for Children and the Corporate Parenting Panel and Children's Scrutiny Committee. This report is a public document.

This report provides a summary of work completed by the IRO service in Shropshire for the period between 1<sup>st</sup> April 2013 and 31<sup>st</sup> March 2015

#### 2 Introduction

The Independent Review Officers (IRO) service is set within the framework of the updated IRO Handbook, linked to revised Care Planning Regulations and Guidance which were introduced in April 2011. The responsibility of the IRO has changed from the management of the Review process to a wider overview of the case including regular monitoring and follow-up between Reviews. The IRO has a key role in relation to the improvement of Care Planning for Looked After Children (LAC) and for challenging drift and delay.

The recently published National Children's Bureau research entitled 'The Role of the Independent Reviewing Officers (IROs) in England' (March 2014) provides a wealth of information and findings in regards to the efficacy of IRO services and outlines a number of important recommendations which includes 'the Importance of Listening to children and making sure their rights are protected ', 'if there is a conflict of interest the IRO must be on the side of the child'...

The Annual IRO report is produced by the Independent Review Unit (IRU) and provides quantitative and qualitative evidence relating to the IRO Service in Shropshire as required by statutory guidance.

This report will identify good practice and highlight issue for further development through the well established Quality Assurance process.

#### 3. The Legal Context

Every child who is looked after by Shropshire Council must have a care plan which details the long term plan for the child's upbringing and the arrangements made by Shropshire to meet the child's day to day needs. All local authorities have a statutory duty to regularly review that care plan within legislative timescales (Care Planning and Case Review Regulations 2010)

The appointment of an IRO for every looked after child is a legal requirement under section 118 of the Adoption and Children Act 2002 and subsequent Review of Children's Cases Regulations 2004. The role of the IRO was strengthened in the Children and Young Person's Act 2008 and Care Planning, Placement Regulations and Case Review 2010.



From December 2012 the Looked After Children (LAC) population was extended to include those children placed on remand in secure units or youth offending institutions under the *Legal Aid, Sentencing and Punishment of Offenders Act 2012* (LASPO) arrangements. This Act places a responsibility on Local Authorities to treat all children remanded to custody as LAC up to the age of 18 years with each young person having a remand plan which is the equivalent of a care plan.

#### 4. Main Duties of the Independent Reviewing Officers

The IRO's role is to quality assure the care planning and review process for each looked after child and to ensure that their wishes and feelings are given full consideration. All looked after children should have an independent review of their case within 28 days of becoming looked after, this is then followed by another review three months later and further reviews a minimum of every six months. If a young person has an unplanned change in placement for any reason then they must have another review within 20 working days, three months and six months.

Every looked after child should have an IRO appointed who will monitor their case and, where necessary, challenge poor practice. While the IRO's work with social workers and managers it is not their role to case manage but provide an independent overview to ensure that the authority is providing good outcomes for young people in its care.

#### The significant core functions of the IRO include:

- Chair a young person's child care review;
- Monitor the child's case on an on-going basis;
- Increase scrutiny and oversight of the child's care plan, Quality assurance role;
- Increase participation of children and young people and their families;
- Securing greater stability for children;
- Care plans must be able to meet court requirements ;
- Clear processes of assessment, care planning, intervention and review to improve experience and outcomes for Looked After Children.

As part of the monitoring role, the IRO has a duty to monitor the local authority's function as a corporate parent and to identify areas of poor practice. This should include identifying patterns of concern around individual children as well as looking at the overall experience of looked after children in Shropshire. IRO's have a duty to immediately alert senior managers if they have concerns. Equally important IRO's should also recognise and report on good practice.

Management Guidance within statute requires that IROs are independent of the case management for the cases they review. The IRO service sits within the Independent Review Unit in the Safeguards Group of Shropshire Council. IROs are directly line managed by the Service Manager, Safeguarding and Review. Who in turn reports directly to the Head of Children's Social Care and Safeguarding.

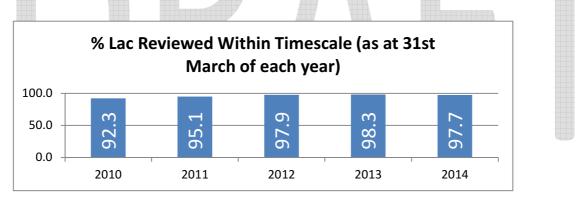


#### 5. Staffing and workload

The Independent Review Unit is now staffed by 6.6 fulltime equivalent IROs. This was increased by 1 IRO for 12 months during 2013/14 (this arrangement finished in March 2015). However, capacity continued to be challenging given the increased role of the IRO coupled with the fact that the IROs in Shropshire, except one full time IRO, fulfil the dual function of Child Protection Conference Chair and IRO. At the end of 2013 \ 14 the number of children in need of child protection plans stood at 257 and LAC was 271. As of the 20<sup>th</sup> March 2015 we have seen a little change compared to the previous year's data with children in need of child protection plans 251 and LAC has increased by 16.2% (315)

The make-up of the team is comprised 1 male worker and 6 female workers. All are White British. All IROs have, as required, a considerable number of years' experience in children services. Within the group there is a wide range of experience, with IROs' previous roles including front line social work with Children with Disabilities, Looked after Children and Child Protection, supervisory and managerial experience and residential care experience. Our longest serving IROs have provided longterm continuity for many years to many of our young people in care.

At specific times during the year, a FTE IRO caseload in 2014 has been as high as 100 children ( looked after children and child protection cases) – the IRO Handbook recommends a caseload of 50-70 looked after children (IRO Handbook, 2010). Ofsted has commented on the correlation between the caseload of an IRO and their ability to exercise their statutory function. However, LAC reviews continue to be consistently held within timescales in Shropshire.



	31/03/2012	31/03/2013	31/03/2014
Looked after children cases which were reviewed within required timescales	97.9	98.3	97.7
No. looked after children >4 weeks	190	233	264
No. children whose cases reviewed	186	229	258

\*Effective and timely reviews should ensure that the care plan remains appropriate for the child and that the needs of the child are well met. A higher figure is seen as better performance.



In response to the increased demand, the Head of Children's Social Care and Safeguarding undertook a three year analysis of our population of Looked After Children and following this developed Shropshire's LAC strategy.

#### LAC Strategy

The overarching principals : We will work to when working with children who are on the edge of care and children who are received into local authority care are:

- That we prevent children need to come into the care system where it is possible and we support them to remain in their family care where it is safe to do so providing support to families and children for as long as it is needed to ensure that the care and experience of life for the child is safe, stable and promotes their welfare.
- That we deliver our services with flexibility and use innovative approaches to provide a range of services to children and families to meet individual need providing the right service and the right time.
- That we ensure that our care plans for children have taken into account the views of children and their parents and we promote a solution focussed and think family approach to our work.
- That where children need to come into local authority care to protect them from home from harm we progress our assessments and care planning to permanency without undue delay achieving a permanent stable outcome as soon as possible promoting permanency in family care including reunification where it is safe and in the child's best interest to do so.

The LAC strategy for working with the needs of children in local authority care recognises the wide range and complexity of needs presented by individual children and importantly their parents. It acknowledges the research that tells us that children achieve better outcomes when cared for in their family and local communities where it is safe to do so but where children are removed the importance of timely permanency planning is a priority.

The outcomes sought by the LAC strategy are not simply to reduce the number of children received into local authority care but to:

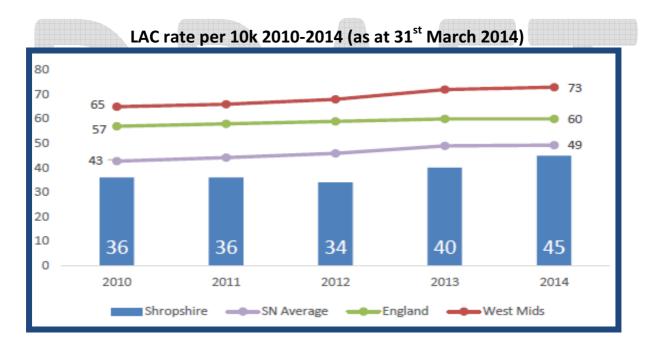
- 1. Reduce the number of children received into local authority care via Section 20 i.e. family breakdown / voluntary request, where timely and effective early help could have prevented the need for LA care.
- 2. Increase the number of children who achieve permanency outside of local authority care in order to ensure these children can move forward leading 'normal' family lives without long term intervention of the local authority.



- 3. To increase the number of children who are placed locally in Shropshire maximising potential to achieve stability in their school and health provision and connections with community and family where this is appropriate.
- 4. Reduce the duration of time children spend in local authority care, achieving permanency as soon as possible.
- 5. Reduce the number of children re-entering the care system by supporting sustained rehabilitation to parental care where it is safe to do so.

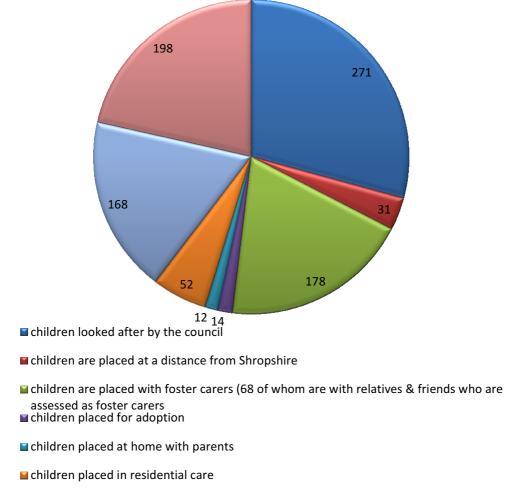
#### 6. Looked After Children at a Glance

DfE figures released in October 2014 demonstrate a five year trend for Shropshire alongside All England, Shropshire's statistical neighbours and the West Midlands region. Although, Shropshire has seen a rise in its overall LAC population this is in line with rises seen in other LA's nationally and regionally. In Shropshire our overall LAC population per 10K of children continues to be lower than that of All England and our Statistical neighbours.



\* At the end of March 2013 there were 241 children looked after by Shropshire Council and by comparison at the end of March 2014, there were 271 – the end of year figures are not yet available for 2014\15 but there has been an increase of just over 16% as at the **20**<sup>th</sup> **March 2015** to 315 children looked after by Shropshire Council.





## Shropshire Children in Care Snapshot as at 1st April 2014

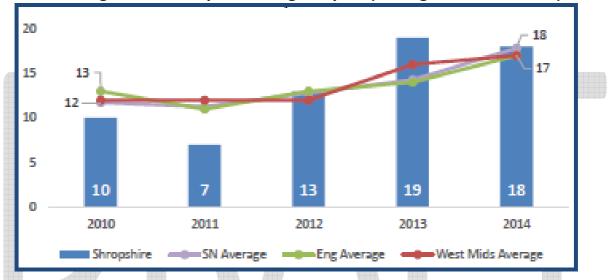
■ children are in the care of the council through a legal order

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Permanence decisions are vital to ensure best outcomes for our Looked After Children. This achieved through good quality assessment, care planning and reviewing of children's circumstances. Children are being identified earlier for adoption, the court and placement process is responding quicker and the perceptions of the IROs is that children are generally experiencing less delay in the system.

The following chart outlines the percentage of our looked after population that have moved to permanency through adoption. This illustrates that we are proportionately on par or better than our statistical (and our West Midlands) neighbours and all England at achieving permanence through Adoption.



Percentage of LAC Adopted during the year (ending 31<sup>st</sup> March 2014)

The chart below illustrates the basis upon which children and young people are in our care with a significant majority being in the care of the local authority by order of the Court. This means that that their admission to our care was planned in order to safeguard them from significant harm. The remaining 37% are looked after by virtue of parental agreement.



### **Trend in LAC Legal Status %**

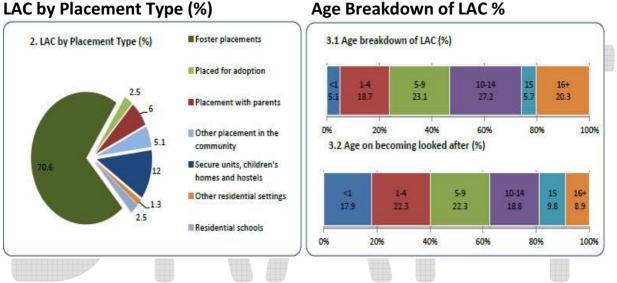
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#### 7. Placement Stability / Sufficiency

Shropshire Council currently has a contract with an established provider, who provides the majority of the residential care provision that is required; this was established following considerable research into LAC pattern and trends from 2003 - 2008 culminating in a fuller understanding of commissioning requirements and how sufficiency could be best achieved. Further evaluation has taken place (LAC strategy 2014) and work is ongoing with Commissioners and Officers to consider the needs of Shropshire children who require residential care.

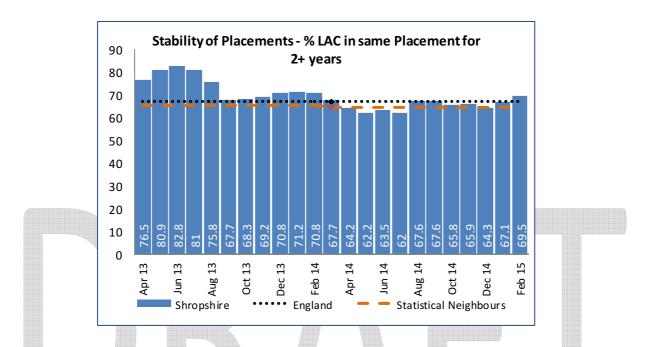
This set of charts outlines the current number of children by percentages that are looked after by Shropshire Council and the means by which they are eg placement type. It is easy to see that foster care is utilised in the significant majority of cases. We can also see that 40.2 % of children looked after entered care at age 4 years or below (17.9 + 22.3)



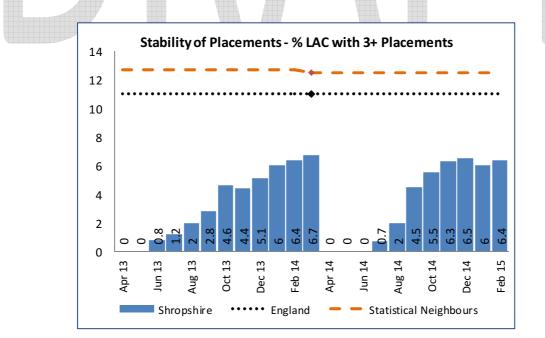
# LAC by Placement Type (%)



Stability of placements is generally good in Shropshire. The following charts relates to children under 16 who have been looked after continuously for 2.5 years but who were in same placement for 2 years. The result at the end of April 2014 is on par with our statistical neighbours and the projected outcome for 2014\15 is looking likely to be better than our statistical neighbours and all England.



The following chart illustrates that the stability of placements is excellent in terms of multiple moves of placements for our Looked After population (the lower the percentage the more stable the placement arrangements)





#### 8. Looked after young people placed outside the county boundary

There were 31 children placed at a distance as at 31<sup>st</sup> March 2014. This includes residential provision outside Shropshire boundaries and connected persons (i.e. family members who were approved as foster carers. The IROs do maintain contact with the young people placed at a distance and undertake the statutory reviews at the placement. The IRO service is very aware of the findings from Ofsted's Thematic Review *From a distance: Looked after children living away from their home area (April 2014)* 

In essence this thematic inspection evaluated the effectiveness of local authorities in discharging their responsibilities to looked after children in out of area placements .The inspection gathered evidence from 92 cases from nine local authority areas (Shropshire being one of them) and Inspectors visited the nine local authorities. The inspection also drew on the views of looked after children and young people, carers, and professionals from the local authorities and from partner agencies. The inspections found children were living outside their home local authority for a variety of reasons, but most commonly it was due to a shortage of suitable carers close to home. Although many placements out of area did provide children with stability, in many cases there were weaknesses in the care provided. This included local authorities giving insufficient consideration to the quality of care; insufficient direct support to meet children's complex needs; and not enough consideration was given to how children could keep in touch with all the people that were important to them. In addition, in four of the local authorities visited, information was not shared properly with agencies when children moved out of area.

Occasionally, the lack of proper multi-agency planning led to serious delays for children. For example, for one young person living in a children's home more than two hours' travel away from his home local authority, support from CAMHS had been delayed due to the service in his home local authority closing the case before the host area CAMHS agreed to offer support. However, the arrangements in Shropshire were highlighted as an example of good practice (below is an extract from the report)



#### Shropshire Looked After Children Education and Health Team

The work of the Looked After Children Education and Health Team in Shropshire is ensuring good transitions and timely access to support for children placed out of area. The multi-agency team, located together and led by the headteacher of the virtual school, offers shared expertise and facilitates an understanding of individual children's needs, intervention and support. A key worker from the team is allocated for each child living out of area and works closely with the allocated social worker and key professionals where the child is living, to promote continuity of healthcare and education for children.

This team has been successful in engaging and re-engaging children in education and in ensuring access to CAMHS support when necessary. This has promoted placement stability, continuity of support and improved life chances for children.

# *From a distance: Looked after children living away from their home area (p. 20, Ofsted, April 2014)*



#### 9. Children's participation

In line with the IRO Handbook there is already considerable improvement of Social workers preparing and sharing their reports with young people, parents, carers and other professionals.

There continues to be a high level of participation by young people in their reviews. This has always been the case in Shropshire as this was the culture and expectation set as part of the development of the IRO service prior to 2004 when the IRO gained statutory footing Children and Adoption Act 2002.

The child or young person has been supplied with or knows who to ask about being a Looked After Child	88%	
The social worker's report was received 3+ days before the review	68%	
The young person(aged 4 years and over) was prepared for their review	82%	
The young person contributed to the review (aged 4 years and over) and their views were clearly available	95%	
All the key people were present and/or reported to the review	75%	

#### LAC Reviews as at 31<sup>st</sup> March 2014

Children's participation can take place at several levels e.g. through personal attendance in an effective and meaningful manner, through the completion of the consultation documents, through meetings and conversation with IRO's, use of advocacy service (see appendix 1), etc. In line with IRO Handbook and guidance, Shropshire IRO's seek to ensure that all young people are seen as part of their review process. There are times when it is difficult to engage with young people. Some have profound disabilities, these children are visited separately and are involved as much as possible and some young people, although very rare, simply refuse to participate.

The way in which information is made available to young people and how they can better contribute key planning or decision making meetings was a focus of work following an independent review of the effectiveness of the IRO and Conferencing Service. A website -

<u>www.safeguardingshropshireschildren.org.uk/lac/index.html</u> - was designed with the help of looked after children, care leavers, the Care Council Crew, Council officers, and IROs. Following two years in existence the website is being refreshed and revised by the Care Council Crew.

#### 10. Education and Health

In previous years the Local Authority have been required to provide an annual report to the Department for Education (DfE) on the educational attainments and attendance levels of those LAC continuously in care for specified periods. Information was required on relative attainments at Key Stage 2 and 4 with reference to the percentage of LAC achieving 5 GCSEs (or equivalent) at A\*-C grade including Mathematics and English Language.



Whilst the above is no longer a requirement, Shropshire values this information and an annual report on the educational attainments of our Looked After population is completed and reported to Children's Scrutiny Committee and Corporate Parenting Panel. Therefore, this report should be read in conjunction with **Report on the Educational Achievement, Attendance and Health outcomes of Shropshire's Looked After Children (LAC) in the Academic year 2013-14,** which was authored by the Headteacher for the Virtual School (and Service Manager for the LAC Health and Education Team).

The report mentioned above also outlines the services received by Looked After children which was delivered by the Designated Nurse for LAC or by the two CAMHS Senior Mental Health Practitioners (SMHPs) within the LAC Health and Education Team.

As would be expected Shropshire LAC experience significant difficulties with social and emotional wellbeing which has an impact on their overall health. Every child's story is individual. The positive practices that lead to consistent and available support to Shropshire's LAC and which promote their self-esteem, increased security, and therefore have a positive impact on their overall health are:

- Stability of care and educational placements.
- Multi-agency ethos of supporting children and their carers leading to early identification of health issues.
- Good access to health services e.g. primary health care, LAC health assessments; with a strong commitment from carers to ensure children receive necessary health care.
- Training for carers about improving / supporting health is available and utilised by carers.

Social Workers are able to actively access LAC CAMHS via an initial consultation process. This provides an essential early discussion to begin to assess the needs of children without delay and further signposting directed to core CAMHS by LAC CAMHS. IRO's feedback is that referral to LAC CAMHS is activated quickly but referral to core CAMHS is not so timely. Often core CAMHS will refuse to work with young people-for example due to their lack of stability in placement. The criteria for core CAMHS are not understood well enough and there is a feeling they need to be more accessible, flexible and adaptable to meet the needs of LAC Children. Again there is concern about the engagement of Core CAMHS. This issue was also raised in the recent Annual Report of Shropshire's Safeguarding Children Board.

#### Shropshire Safeguarding Children Board Annual Report 2013\14

CAMHS services remain a major area of weakness in Shropshire, with improvement hampered by the complexity of commissioning. Improvements in this service area are long overdue, and are particularly needed in the context of rising levels of self harm amongst young people. This is recognised by the Health and Wellbeing Board, which has included the emotional and mental health of young people in Shropshire as a priority.

Shropshire Safeguarding Children Board Annual Report 2013\14



#### 11. How are we doing and what do we know?

The IRO Handbook 2010, statutory guidance states -"The IRO's primary focus is to quality assure the care planning and review process for each child and to ensure that his/her current wishes and feelings are given full consideration. To be successful, the role must be valued by senior managers and operate within a supportive service culture and environment. An effective IRO service should enable the local authority to achieve improved outcomes for children."

In both residential and foster care placement the feedback from IRO's is that generally young people are offered emotional support within these placements but there has been the occasional case where young people are identified as needing to move on because the placement is not meeting either their holistic needs.

Recent audits as part of the overarching *Shropshire Children's service's Audit and Quality Assurance Framework 2014* found that Care plans for children could be sharpened and be more individualistic; reminding us all that care plans are a reflection of the child's needs and how we, as Corporate Parents, will meet these needs in the short and long term.

We have seen an increase in the number of Connected Persons assessments and subsequent fostering by family members arrangements in Shropshire. Whilst this is very positive in most cases, there is often insufficient progress made to alternative arrangements such as Special Guardianship Orders. The IROs are reviewing all of the cases where SGO should be actively considered and progressed as a matter of priority. This work began in February 2015 and will be monitored closely.

The social work practice is generally good with communication between operational staff and the IROs continuing to benefit from being co-located in the same building.

The timeliness of social work reports to LAC reviews needs to be improved. The social work reports for the statutory review are mostly received in a timely way by the IRO before the review but too often this is not the case and the necessary paperwork is given to the IRO on the day of the review. This is also the case for care plans. The IROs have ensured that remedial timescales are in place for any outstanding paperwork.

The IROs report that our LAC cohort are visible, vocal and well represented in their statutory reviews. Most reviews take place at the child's placement with the participation of the young person concerned.



#### 12. What Young People had to say

IROs have been speaking with children and young people, who are of sufficient age and understanding, about their experiences of having been in care in Shropshire when they were about to leave care either by returning home / to another family member or they were about to turn 18 years old. The messages in the next sections capture a sample of comments gathered over the past year.





Not enough freedom, but I understand why because they (carers and social workers)wanted to keep me safe

> ... they (carers)didn't give up on me; too many social workers - shared lots of personal information then (they) leave

> > it's (placement) brilliant; very, very good



#### 12.1 Advocacy

The council has a statutory duty to offer an independent advocacy service to Looked After Children. The main purpose would be to empower and enable young people to have a voice by providing information, advice, support and advocacy. Article 12 of the UN Convention on the Rights of the Child upholds children's rights to participation in decision-making about matters of concern to them further supports the need for advocacy.

The Shropshire advocacy service, provided by **CoramVoice** (a national charity) receives referrals from young people and professionals through the helpline. Helpline advocates work with young people to attempt to address any issues quickly by phone. If this is not possible and face to face advocacy is required the advocacy manager is contacted to allocate the case to a Shropshire advocate. On receipt of a referral, an advocate will contact the young person (wherever appropriate) to advise of the service and confirm that they would like advocacy help. If young people need to be signposted to other resources this will happen at the helpline stage.

#### Case Study 1 LAC (Disability)

At the social workers and IROs suggestion advocacy support was agreed at core group meetings and LAC reviews. D was in need of non instructed (due to limitations in D's communication) advocacy and an appropriate advocate was allocated to D.

Due to the lack of an allocated adult social worker and non completion of Pathway Plan it was agreed by the involved professionals and the advocate that a Children Act complaint would be issued to the local authority.

As soon as the complaint was received a social worker was very quickly allocated but before assessment was carried out the social worker was moved to another team.

A second complaint was raised and another adult social worker was allocated and began assessment the week before D's 18<sup>th</sup> birthday.



#### 12.2 Independent Visiting

There is also a statutory duty upon Local Authorities to offer Independent Visiting to Looked After Children. The role of **Independent Visitor** was created in the United Kingdom under the Children Act 1989 to befriend children and young people in care.

The Act makes it a statutory requirement that children and young people who are looked after by Social Services, and who have little or no contact with their birth parents, should be offered the chance to have an adult in their lives who can give them support and advice, and take an interest in their affairs.

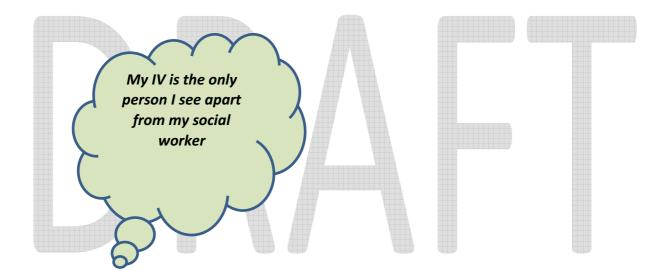
In Shropshire this service is provided by SOVA, a National Charity, and this has been the case for the last 3 years. An Independent Visitor is a volunteer who befriends a child or young person and helps them to develop meaningful, long term relationships with adults. Independent Visitors usually visit a child or young person on a monthly basis and engage them in fun activities that build their confidence and self-esteem whilst acting as a positive adult 'role model' for the young person.

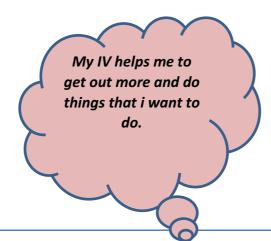
The service is highly valued by the young people who access this service and below are some of their comments about they view the role of independent visiting in their lives.



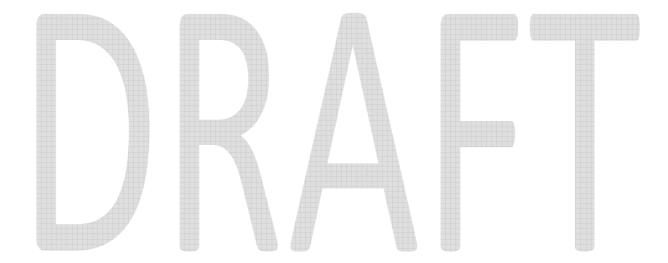














#### 13. IROs Taking Up the Challenge

Ofsted has commented in thematic reviews and in individual inspections that a formal dispute resolution process was in place in most authorities but were not always well understood or used when required. The IROs in Shropshire do regularly meet with the case holding social worker and or the Team Manager; this is one of the advantages of being collocated in one building. Often any issues of challenge are resolved through this method. There have been very few cases where the IRO has needed to engage the next level of the dispute resolution process and involve Service Managers but when this has occurred the matter has been resolved satisfactorily. There have been no occasions where the IROs have felt the need to escalate any issues to any higher level such as the Chief Executive of the Council or to Cafcass.

A Red –Amber- Green rating system (RAG) is in effect with all LAC Reviews. If there are aspects of the case as a whole where there are areas to be attended to, the flagging system raises this to the attention of the Team Manger if amber and to the Team Manager and the Service Manger if they are flagged as red. The IROs will follow up on the outstanding areas in between reviews and will formally review the RAG status at the next statutory meeting. At the end of 2014 90% of the reviews completed were rated as green (care plan was appropriately progressing) just under 10% were raised to the attention of Team Managers as they were rated amber and just about 1% were rated red but by the next review the issues had been satisfactorily addressed.

#### 14. Key Messages

- The IRO service is a county wide service which enables the IROs to have a panoramic view of the work undertaken with our children and young people who are cared for by Shropshire Council. They are well positioned to comment on the quality of service and to identify themes or gaps with a close watch always being kept on issues of safeguarding.
- The IROs provide a very individualistic service to our looked after children and is heavily based on developing a consistent relationship. As previously stated this role is often the longest sustained relationship with a professional, carers being the exception, that a young person in care experiences.
- Links between the IROs and Corporate Parenting Panel has been developed and an IRO identified to regularly attend.
- The IROs need to continue be committed to implementing the requirements within care planning & case review guidance and IRO Handbook. However demand across Child Protection and Looked After Children has meant that the IROs (FTE) often have caseloads in excess of the recommended 50-70 children.
- The Independent Review Unit is engaged with Business Redesign to pilot new ways of working including locality hub working; extending their mobile working arrangements and sharpening the allocation of work to localities were possible to reduce travel and therefore increase capacity.
- IROs are now required to send out their report within the 20 working days of the completion of a Review (with the recommendations being available at day 5). This presents significant challenges given capacity; however, this is an area that we are addressing through redesign of our administrative support to the IRU which will now include the minuting of the 1<sup>st</sup> LAC



review by an administrator. Developments are also planned to move the recommendations of LAC reviews onto Carefirst.

- The role of the IRO as a guardian of good practice is very visible during Ofsted inspections it as such their role needs to be embraced by operational colleagues and by senior officers in the Council and the IROs will need to be explicit when they are utilising the dispute resolution procedure.
- The Quality Assurance system used by the IROs is being reviewed to make it simpler and more robust. Following the recent Audit the Auditors Peer challenge, the IROs have been identified as being well placed to review the recommendations for action from team managers' audits within 3 months of the audit having taken place and reporting back on areas of concern and progress.

