

Nottingham City Council

IICSA Action Plan

On 31st July 2019, IICSA published its findings into the extent of any institutional failures to protect children in the care of Nottingham City and Nottinghamshire County councils from sexual abuse.

There were two key recommendations for Nottingham City Council, for which we will need to publish our response within six months of the publication of the report:

- Nottingham City Council should assess the potential risk posted by current and former foster carers directly provided by the council in relation to the sexual abuse of children. They should also ensure that current and former foster carers provided by external agencies are assessed by those agencies. Any concerns which arise should be referred to the appropriate body or process, including the Disclosure and Barring Service, the local authority designated officer (LADO) or equivalent, the fostering panel and the police.
- Nottingham City Council and its child protection partners should commission an independent, external evaluation of their practice concerning harmful sexual behaviour, including responses, prevention, assessment intervention and workforce development. An action plan should be set up to ensure that any recommendations are responded to in a timely manner and progress should be reported to City's Safeguarding Children Partnership.

As part of the wider cross-cutting learning from the 14 strands of the Inquiry, they will return to a number of issues that have emerged during this investigation, including but not limited to:

- Harmful sexual behaviour.
- The barriers to disclosure of sexual abuse by children, including those in care, and proactive steps to reduce those barriers.
- The approach to civil litigation, including the role of insurers.

The full report can be found [here](#).

This action plan has been developed in response to the findings of the report.

	Recommendation Addressed	Action	Lead	Timescale
1.	Highlighted as significant in evidence from survivors	To continue to work with victims and survivors to ensure that they have access to the right support both to services provided by the Council and to those not provided by the Council. Feedback from victims and survivors will be the key criteria around how we judge the impact of this.	Corporate Director	Ongoing
2.	Access to records for those formerly in care has not been well handled.	To continue to provide assistance to citizens wishing to access their social care records.	Corporate Director	In October 2018, Nottingham City Council established and recruited to a specialist post who deals wholly with the provision of social care records
3.	The City have been guarded and slow to appreciate the level of distress felt by complainants. Their approach has caused understandable upset and anger, which could have been avoided	To complement our wider strategic work with survivors and their representatives, we will continue to offer to meet with individual victims and survivors (accompanied by their representatives if required) to offer an apology in person and in writing.	Corporate Director	Ongoing
4.	Highlighted as significant in evidence from survivors	To consider with safeguarding partners ¹ the outcome of the needs assessment being undertaken by Lime Culture ² and use their conclusions to inform future commissioning of services to support victims of violence and sexual abuse. Consultation with victims and survivors will continue to be integral to this.	Corporate Director	Services are due to be recommissioned in 2020 for 2021
5.	Highlighted as significant in evidence	In partnership with Police and Crime Commissioners Office	Corporate	The evaluation is

¹ A *safeguarding partner* in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:

- (a) the local authority
- (b) a clinical commissioning group for an area any part of which falls within the local authority area
- (c) the chief officer of police for an area any part of which falls within the local authority area

² Lime Culture are a sexual violence training and development organisation.

	Recommendation Addressed	Action	Lead	Timescale
	from survivors	and Nottinghamshire County Council colleagues, Nottingham City Council will implement the outcome of the evaluation of the jointly funded support for Survivors Service.	Director	due end of October 2019
6.	Recommendation 1 - Nottingham City Council should assess the potential risk posed by current and former foster carers directly provided by the council in relation to the sexual abuse of children. They should also ensure that current and former foster carers provided by external agencies are assessed by those agencies. Any concerns which arise should be referred to the appropriate body or process, including the Disclosure and Barring Service, the local authority designated officer (LADO) or equivalent, the fostering panel and the police.	Using the risk-based methodology developed to review the HR cases, NCC will assess the risks posed by current and former foster carers, including those from independent fostering agencies.	Head of Children in Care	To commence October 2019 (to be completed this financial year).
7a.	Recommendation 2 - Nottingham City Council and its child protection partners should commission an independent, external evaluation of their practice concerning harmful sexual behaviour, including responses, prevention, assessment intervention and workforce development. An action plan should be	Nottingham City Council and our Safeguarding Partnership will commission an independent external evaluation of our practice using the Harmful Sexual Behaviour Framework ³ developed by NSPCC, Research in Practice and Professor Simon Hackett - the expert witness relied upon by IICSA.	Corporate Director	The review will commence in October 2019
7b.		NCC and our Safeguarding Partnership will consider the recommendations and practice improvements required from the evaluation of practice against the Harmful Sexual		Consider at Safeguarding Partnership on

³ An evidence-informed framework for children and young people displaying harmful sexual behaviours. This framework helps local areas develop and improve multi-agency responses to children displaying harmful sexual behaviour (HSB). It provides a coordinated, systematic and evidence-based approach to recognising and responding to the risks and needs of this vulnerable group.

The framework was developed by the NSPCC, Research in Practice and Professor Simon Hackett with input from a number of national organisations, local authorities and subject experts.

This new version updates and replaces the previous framework published in 2016.

	Recommendation Addressed	Action	Lead	Timescale
	set up to ensure that any recommendations are responded to in a timely manner and progress should be reported to City's Safeguarding Children Partnership.	Behaviour Framework.		04/02/20
7c.		Commence implementation of the recommendations of the above review and report back to the Safeguarding Partnership		Following Safeguarding Partnership (Feb 20)
8a.	Continuing to the present day, neither the County nor the City has had a process by which there has been regular reporting of the number of allegations and the response to those allegations. This has meant that knowledge of the scale of allegations of sexual abuse of children in care and the response to those allegations has been limited and inconsistent.	To ensure that the scale of sexual abuse of children in care by individuals in a position of trust or any peer that they were placed with, is understood by senior managers and elected members, we will provide a quarterly update on any such allegations to the Safeguarding Partnership.	Corporate Director	The first report to December 2019 Safeguarding Partnership Business Management Group
8b.		We will also introduce a sub section within the Independent Reviewing Officers Annual Report that separately identifies allegations of sexual abuse of children in care by individuals in a position of trust or any peer that they were placed with.		To be included in the 2019/20 annual report
9.	Highlighted as significant in evidence from survivors	Ensure that learning from all relevant sources, including complaints, and regulatory and inspection activity is regularly reviewed to continually improve our services. Regular updates will be provided to the Safeguarding Partnership about the implementation and impact of this learning.	Corporate Director	Ongoing