Progress on the Our Bravery Brought Justice recommendations August 2026

a) Recommendation to Cyngor Gwynedd

Ref / no	The recommendation of the report	Has the Council achieved what was required of us?	Any other matters or relevant barriers
Listen to the voice of the child			
7.	**LA1 should consult with pupils to identify the best way to enable them to access an individual/service outside school to report concerns. Contact details should be prominently displayed in all schools.**	Yes. The Council has implemented the recommendation by consulting with children and young people about their experience and their confidence in safeguarding arrangements. The Council has strengthened the visibility of safeguarding information in schools, ensuring that contact details and appropriate ways to raise concerns are shown clearly and are accessible for pupils.	

b) Recommendations for every organisation / every Local Authority

Ref / no	The recommendation of the report	Has the Council achieved what was required of us?	Any other matters or relevant barriers
Listen to the voice of the child			
1.	**All organisations working with children must ensure that their policies in relation to listening to the voice of the child are revised, implemented in full and reflect what has been learned from this Review.**	Yes. The Council has reviewed and strengthened its arrangements to ensure that the voice of the child steers decisions through the work of the Youth Forum and ensure the participation of children and young people across services. The Voice of the Child Strategy has been developed over the last year, and the Cabinet will be required to formally adopt it in the autumn. In terms of safeguarding, a social worker makes a proactive effort to listen to the voice of every child who is subject to a Part 5 safeguarding referral (see **recommendation number 6**)	-
2.	**Organisations must be able to show evidence to their professional Board and Regulators that they have a process in place for listening to children and that it**	Yes. The Council has embedded arrangements to listen to the voice of children and young people through formal participation structures, regular engagement through the	-

	is embedded and operational in the organisation.	Youth Forum, and governance arrangements that ensure that children's perspectives are considered when making decisions and are reported through the relevant accountability structures.	
3.	**That all agencies ensure that their staff are trained to detect and record a change in a child's behaviour that may indicate that adults are grooming them and/or that they are being abused.**	Yes. As a specific training pack on the subject did not already exist, the NSPCC was commissioned to develop a comprehensive training pack. The pack will be presented in two parts: firstly, a webinar to all Council staff to raise awareness of grooming; and secondly, more specialist sessions tailored to specific groups, including social workers and schools' designated safeguarding individuals. The training has started to be used, and the provision will be introduced to all Council staff over the coming months. This pack will also be available for other authorities to use or purchase, ensuring that the investment contributes to improving practice on a wider level.	An 'off the shelf' training pack did not exist, although we contacted several companies and organisations. Consequently, the NSPCC was commissioned to develop a comprehensive training pack. This has led to some delay in developing the pack. However, to ensure that school staff receive the necessary training in the meantime, we adapted the existing safeguarding training to address the main requirements and the key messages about grooming.

4.	**In schools, these changes must be recorded on an electronic data management system.**	Yes. Every school in Gwynedd now records on an electronic data management system.	-
5.	**When a referral is made under Section 5 of the Safeguarding Procedures for Wales, all safeguarding information on the child's record on the data management system must be taken into account when assessing risk and vulnerability.**	Yes. The internal recording form has been adapted so that it is a requirement for every agency present at Part 5 meetings to provide and record relevant background information and history.	-
6.	**When a referral is made under Wales Safeguarding Procedures Section 5 and is third party, the child who is subject of the referral must be spoken to by children's social care, even where they have not made a disclosure themselves.**	Yes. Cyngor Gwynedd has introduced these arrangements.	There were some challenges in implementing this procedure, including occasions where a parent refuses to give consent to speak to the child, and other occasions where the child themselves refuses to engage. In these cases, the child was only named as a witness or a potential witness, instead of an individual that the allegation related to directly. Should the allegation relate to abuse against the child itself, the Council would ensure that the voice and experience of that child were heard as part of the process.

9.	**Local Authorities should show evidence of how they support and advocate for victims of trauma, on a case-by-case basis, where their ability to access education has been limited due to their experiences. This would include ensuring that victims have access to further and higher education, and the funding needed to do so, when the requirements for grades and attendance have not been met due to the trauma they have been through.**	Yes. Cyngor Gwynedd has declared and offered support to any one impacted, offering a support pack to the school community's direct and indirect victims. The Council has also committed to facilitate access to the education of trauma victims when it is restricted due to their experiences and have done so in this specific case.	
Managing allegations and concerns about adults working with children - multi-agency response			
18.	**That all members of staff, volunteers (including administrative and facilities officers) and school Governors receive training on sex offenders' modus operandi and their methods of grooming using the Finklehor model.**	In progress. The "Finklehor model" and methods of grooming from sex offenders have been included in the new training that has been developed by the NSPCC. It will be available to all Council staff (including Governors and Elected Members). This will be provided to all staff over the coming months (see explanation of **recommendation 3**)	An 'off the shelf' training pack did not exist, although we contacted several companies and organisations. Consequently, the NSPCC was commissioned to develop a comprehensive training pack. This has led to some delay in developing the pack. However, to ensure that school staff receive the necessary training in the meantime, we adapted the existing safeguarding training to address the main requirements and the key messages about grooming.

c) Recommendations for the Regional Safeguarding Board

Ref / no	The recommendation of the report	Has the Council achieved what was required of us?	Any other matters or relevant barriers
Managing allegations and concerns about adults working with children - multi-agency response			
13.	**Safeguarding Boards are assured that their area's LADO officers receive regular training and supervision.**	Yes. The Safeguarding Board holds professional networks that focus on the Part 5 practice and procedures. Council officers attend and contribute to these to support ongoing improvements in practice and processes.	
14.	**Safeguarding Boards receive and scrutinise Local Authority reports on managing allegations at least once a year, and that reporting of the allegations becomes part of the regulatory requirements of Estyn and CIW.**	Yes. In accordance with the demand, the Council provides quarterly updates to the Regional Safeguarding Board, which includes information about activity, outcomes and trends that arise about Part 5 matters.	The Council will work with the Safeguarding Board, Estyn and CIW to respond to any further reporting requirements that could arise in the future.
The need for training - think the 'worst possible' and understand that 'it could happen here'			

19.	**That assurances are given to Safeguarding Boards that this training [sex offenders and their methods of grooming modus operandi] is delivered to Local Authority Education, Children and Human Resources Services officers, who lead on managing concerns or responding to concerns about adults working with children.**	In progress. The "Finklehor model" and methods of grooming from sex offenders have been included in the new training that has been developed by the NSPCC. It will be available to all Council staff (including Governors and Elected Members) This will be provided to all staff, including the officers of Education, Children and Human Resources Services, over the coming months (see explanation of **recommendation 3**)	An 'off the shelf' training pack did not exist, although we contacted several companies and organisations. Consequently, the NSPCC was commissioned to develop a comprehensive training pack. This has led to some delay in developing the pack. However, to ensure that school staff receive the necessary training in the meantime, we adapted the existing safeguarding training to address the main requirements and the key messages about grooming.
20.	**That the Safeguarding Board is reassured that Local Authorities have clear Whistleblowing policies, and that attention is drawn to them and that all staff can use them safely.**	Yes. Cyngor Gwynedd has adopted a whistleblowing policy in February 2026 and a comprehensive programme to promote amongst managers, team leaders and all staff.	The Council will continue to work with the Safeguarding Board to respond to any requirements about assurance or further reports that could arise in the future.

Ch) Recommendations to the Welsh Government

Ref / no	The recommendation of the report	Has the Council achieved what was required of us?	Any other matters or relevant barriers
Listen to the voice of the child			
8.	**That the Welsh Government develops the curriculum to ensure pupils have the knowledge to understand grooming behaviour by adults and know how to report this safely to an adult.**	No.	We cannot act until the curriculum has been adapted.
Managing allegations and concerns about adults working with children - multi-agency response			
10.	**That the Welsh Government ensures that the review of Section 5 procedures is informed by this Review and takes into account what has been learnt from it.**	Yes. Cyngor Gwynedd has introduced new procedures, but as a result of inconsistencies with OBBJ recommendations, the Council goes beyond what is set out in these procedures.	There are inconsistencies between the new Part 5 procedures and the OBBJ recommendations, and Cyngor Gwynedd has raised the issue with the Welsh Government.
11.	**The revised procedures state that the voice of the child must be heard, even if the child has not made any disclosure.**	Yes. Cyngor Gwynedd has introduced these arrangements.	

12.	**That decisions about the threshold for using the procedures are required to be made in a multi-agency meeting and not by the LADO alone, and that previous concerns, complaints and allegations be taken into account.**	Yes. Robust arrangements have been established with the Police to support the process, and multi-agency meetings are being held. Decisions are not made solely by one officer. The Council has invested in an additional Designated Officer for Safeguarding (DOS) to strengthen those arrangements.	Although Cyngor Gwynedd has amended its arrangements in accordance with OBBJ recommendations, the new national procedures for Part 5 do not reflect or fully address those changes. The new Guidelines state: *"the Local Authority's Designated Officer/Designated Officer for Safeguarding is responsible for receiving, responding to, making decisions and monitoring every report in relation to allegations against practitioners/individuals in a position of trust."* This is a cause for concern to the Council, because the procedures do not acknowledge or reflect the operational model that has been established locally following the OBBJ recommendations.
15.	**That the Welsh Government considers requiring schools to develop an 'Adult Conduct of Concern Policy' (known as the 'Low-level Concerns Policy' in England), and consider providing guidance on safe working practices.**	No For this to be effective, a national arrangement is required as OBBJ states.	We are awaiting guidance from the Welsh Government. Cyngor Gwynedd has consistently raised this issue through the Ministerial Assurance Group.

16.	**The new Strategy (child abuse prevention 10-year strategy) is proven against the findings of this review and that any lessons learned are incorporated into the new strategy.**	Yes. The strategy has been published and there is a Group of internal officers ensuring that the strategy's objectives are being implemented.	The new strategy has been published.
The need for training - think the 'worst possible' and understand that 'it could happen here'			
17.	**That Welsh Government commissions a training resource based on the findings of this Review, for use by all schools in Wales. It should be adaptable so that other agencies working with children can use it.**	No.	We are waiting for the Welsh Government to share the training.
School Governance in Wales			
21.	**That the Welsh Government commences a review of governance arrangements in schools across Wales, that clearly outline the responsibilities of Governors to change from focusing primarily on financial management and outcomes to a situation where safeguarding, health and well-being are accepted as the appropriate foundation to learn and thrive.**	Yes. The Council has taken many steps to strengthen the support available to schools' governing bodies. An additional Governors' Support Officer has been appointed, as well as a Professional Clerk, to provide more support, guidance and an appropriate challenge to governors in carrying out their responsibilities.	Cyngor Gwynedd raises the need for a review of school governance arrangements regularly with the Welsh Government. The review is underway. The Welsh Government is expected to publish the result of the review in the autumn.

		The Council has raised its concerns regarding the existing procedures with the Welsh Government and has called for a review of the arrangements, drawing attention to the challenges and the shortcomings noted during their implementation. In addition, a questionnaire has been distributed to each governing body to establish a baseline of their development needs and to note the fields where more support or training is required. The results of this work will steer a comprehensive training programme which will be introduced from September 2026 onwards.	
22.	**That the Welsh Government commences a review of governance arrangements in schools across Wales, which supports the development and implementation of an easy-to-understand dashboard which provides simple information about the health and wider culture of the school.**	Yes. The Council has set a clear expectation that every governing body follows a standing agenda as a basic requirement. This ensures that key matters, including safeguarding, health and well-being, are considered regularly and consistently, providing the minimum level of assurance and supervision across every school.	Cyngor Gwynedd raises the need for a review of school governance arrangements regularly with the Welsh Government. The Welsh Government is expected to publish the result of the review in the autumn.

		This guidance will be submitted annually as a point of order from now on. The Council has started to pilot a *Governor Hub* dashboard with 10 schools from September onwards. (An easy-to-understand dashboard to keep all the documentation and training of Governing Bodies in one accessible central place).	
23.	**That the Welsh Government commences a review of governance arrangements in schools across Wales, asking the Governors to keep correct records about decisions made in relation to safeguarding matters and report on them to the Local Authority, especially when the decision made does not follow the Local Authority's guidelines.**	Yes. Work has been done to improve the support and resources available to clerks, acknowledging their key role in ensuring that decisions and discussions are recorded correctly and comprehensively. The Council has appointed a central officer to act as a clerk in many schools when that support is required for specific schools. A programme of bespoke training has been introduced to clerks to strengthen their understanding of their role and responsibilities. A Clerks Forum will be established early in September to share good practices and provide ongoing support to every clerk.	Cyngor Gwynedd raises the need for a review of school governance arrangements regularly with the Welsh Government. The Welsh Government is expected to publish the result of the review in the autumn.

24.	**That the Welsh Government undertakes a review of governance arrangements in schools across Wales, which ensures that the Designated Safeguarding Persons and their deputies are subject to external supervision by qualified Social Workers from the relevant local authority.**	In progress. Funding has been allocated to strengthen the provision of support and supervision for Designated Safeguarding Individuals and their deputies. Currently, discussions are ongoing about the most suitable model to achieve this, considering options such as commissioning external provision.	Cyngor Gwynedd raises the need for a review of school governance arrangements regularly with the Welsh Government. The Welsh Government is expected to publish the result of the review in the autumn.
Restrictive Practices			
25.	**That the Welsh Government publishes an appendix to the 2022 Framework guidance for reducing restrictive practices involving adults filming events and provides guidance on the retention period of such videos.**	Yes, but awaiting guidance from the Welsh Government. It is a requirement for every school to adopt the relevant Regional Policy, and the Schools Safeguarding and Well-being Team are conducting regular checks and monitoring to ensure that these arrangements are implemented appropriately. In addition, the Council has commissioned an external review of the use of restrictive practices across schools, including reviewing policies, procedures and the training provided. The findings of this review will steer an action plan to further strengthen arrangements.	The Council is awaiting any further guidance or revisions from the Welsh Government.

Emergency Management			
26.	**That the Welsh Government ensures that each Local Authority has a strategic serious incidents plan which sets out the procedures to be followed in order to respond in an immediate and collective multi-agency manner.** **a. That the plan includes arrangements for caring for the victim, protecting evidence and managing the alleged offender** **b. That the plan includes an official protocol for sharing information with other Local Authorities that may be affected** **c. That a strategic plan is in place to have easy-to-access on-site support for children and adults in institutions where there has been a significant traumatic incident** **d. In a serious incident such as this, consider moving a social worker to work on secondment with the Police investigations team to ensure that the evidence and information are considered from a safeguarding as well as a criminal perspective**	Yes. An Emergency Response Plan has been developed in collaboration with schools to ensure a quick and coordinated response to serious incidents. In addition, the Council has extended its collaboration with regional partners through WASPI arrangements to strengthen information sharing protocols and ensure regular discussions with the Police and other partners. Positive discussions have also been held with the Police about the arrangements of working together in exceptional circumstances, including secondments or appropriate staffing arrangements if required.	

d)Recommendations for the Safeguarding Partners

Ref / no	The recommendation of the report	Has the Council achieved what was required of us?	Any other matters or relevant barriers
Recommendations for the Safeguarding Partners			
27.	**That the Betsi Cadwaladr University Health Board** **a. Considers sharing anonymous CAMHS information with Local Authorities to note places with a high demand and thematic concerns** **b. Gives assurances to the Regional Child Safeguarding Board that professional health workers seek safeguarding advice when a child comes to an appointment with a third party, without parental consent**	The recommendation does not ask for any actions from the Council at this time.	These are recommendations that have been specifically referred to the Betsi Cadwaladr University Health Board. No actions have currently been requested by the Local Authority, but we would continue to monitor any developments or responses arising from these recommendations.