
Response to Offending Plan

"We cannot for a second forget about the most important people in all of this, the girls who should have been safe in their school. The whole purpose of every step that we take is to do everything possible to ensure that no one suffers in the same way ever again and this should be our main consideration at all times."



December 2024

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Summary of the background

Neil Foden, former headteacher of Ysgol Friars in Bangor, was arrested on 6 September 2023, in his workplace following a disclosure by one of the victims. He faced 19 charges, including 12 charges of sexual activity with a child and two charges of sexual activity with a child whilst he was in a position of trust. The criminal proceedings involved five girls over a period of four years.

In May 2024, after a three-week hearing at Mold Crown Court, the offender was found guilty. On 1 July 2024, he was sentenced to 17 years in prison

Following his conviction, the North Wales Safeguarding Board established a Child Practice Review (CPR) under an Independent Chair, Jan Pickles, to establish the circumstances of the whole matter, learn lessons and prevent similar cases in future.

Between September 2023 and May 2024, the investigations into the allegations against the offender took place. This was a criminal investigation led by the Police. With many historical allegations, some of the victims and survivors were now adults and therefore the enquiries about the offences were undertaken by the Police only. For the allegations where the victims and survivors were children at present, these investigations were undertaken in accordance with [Wales Safeguarding Procedures 2020](#). This included interviews and joint investigations between the Children Services and the Police.

In accordance with good practice in such investigations, it was crucial that no action was taken during the criminal investigation which may have undermined the Police's ability to investigate an offence. The investigations were undertaken during the period in accordance with [Part 3](#) and [Part 5](#) of the [Wales Safeguarding Procedures 2020](#). The Council led on the processes under [Part 5](#) of the Procedures to manage and moderate the investigation's activities.

Following the conviction by the Court, in June 2024, the North Wales Safeguarding Board stated immediately that it would open a Child Practice Review. The [North Wales Safeguarding Children Board](#) (NWSCB) is a statutory body under the [Social Services and Well-being Act \(Wales\) 2014](#) and its responsibility is to co-ordinate, monitor and challenge its partner agencies when safeguarding children in North Wales.

The objectives of the NWSCB are to:

- **PROTECT** children in its area who are, or who are at risk of being, abused, neglected or experiencing other types of harm at present, and
- **PREVENT** children who are, or who are at risk of being, abused, neglected or experiencing other types of harm.

The NWSCB notes that its function is to make "Safeguarding everybody's business". The partner agencies are the six local authorities across the region (Cyngor Gwynedd, Isle of Anglesey County Council, Conwy County Borough Council, Denbighshire Council, Flintshire Council and Wrexham County Borough Council), North Wales Police, Betsi Cadwaladr University Health Board, the National Probation Service and the Community Rehabilitation Company.

The Regional Safeguarding Board appointed a Chair to lead the CPR, Jan Pickles, a very experienced individual who has been leading high-profile reviews of this nature and who has specialised in safeguarding children matters for years (further details can be found in part 5 below). Jan Pickles visited Council Members on 11 July 2024 to outline the work ahead of her and the procedure of

fulfilling that work. The CPR is led, without doubt, by an experienced, specialist and passionate individual in the field and we as a Council are pleased about that.

We have benefited greatly from Jan Pickles' advice and guidance over the past months. A CPR of such a serious and complex nature as this is unfamiliar to the majority of Cyngor Gwynedd officers and Members and we are treading new ground on a daily basis. This situation is completely unprecedented therefore receiving the advice of a recognised expert has been invaluable.

It was originally intended for the CPR to aim to reach conclusions within approximately 6 months, which is the usual timeframe for a CPR. However, the scope of the Review has extended considerably since then and its terms of reference are broader and more thorough. It is certainly not a usual CPR and the terms of reference place an expectation on the investigators to consider events dating back to 2017 (two years prior to the arrest would have been normal practice). This is to be welcomed and naturally the timeframe for completing the work has had to be extended as well. We now expect initial conclusions in Spring 2025, with a final report towards the summer.

As a Council, it was considered that the CPR was initially best placed to consider all the facts and reach meaningful conclusions. Consequently, we did not wish to hold our own review or investigation which would not be considered as good as the CPR, or which would cast any shadow over our trust in the statutory and independent process of the CPR. Consequently, the Council did not undertake its own formal reviews or investigations between June and October. Having said that, as outlined in this Response Plan, this did not prevent us from undertaking several steps to ensure that we responded appropriately to the situation.

Following discussions with the Chair of the CPR in the autumn, it was concluded that it was appropriate by then for the Council to move more swiftly with some aspects of our response rather than wait for the findings of the CPR before undertaking our own investigations, for several reasons, including:

- the change in the CPR timeframe in order to extend the scope of the work,
- the substantial work of gathering and presenting the Council's evidence to the investigators of the Review has now been completed,
- new information which came to light as time went on of which we were unaware at the beginning,
- the substantial press coverage, attention on social media and the public interest in the case has led to perceptions which we do not know if they are correct or not.

We stress that we remain completely confident in and fully supportive of the work of the CPR and we benefit greatly from the support and guidance of the Chair. The content of this Response Plan has been checked with the chair of the CPR and she is satisfied that it will not impact their work; indeed, she is of the opinion that several pieces of work will be of assistance to the CPR.

This Response Plan explains what we will do in order to try to fulfil our objectives in relation to all of this.

2. A statement of the Council's position

Before setting out our objectives, it is important that the Council clearly states its position.

The offender's actions have had a deep and shocking impact on the victims and survivors, their families, the school, community, staff and Members of the Council and the entire county.

The essence of a Response Plan such as this is that it is formal in nature, as it refers to several organisational matters. However, we cannot for a second forget about the most important people in all of this, the girls who should have been safe in their school. The whole purpose of this Response Plan and every step that we take is to do everything possible to ensure that no one suffers in the same way ever again and this should be our main consideration at all times.

As a responsible public body, the Council states and recognises that the offences committed were abhorrent and devastating for all the victims and survivors. We wish to apologise to all victims and survivors and wish to assure all concerned that we will do our utmost to discover all the facts and will embrace every lesson that needs to be learned in order to ensure improvement in the interests of future generations.

We will prioritise our resources to support every investigation already underway by us as a Council and the statutory CPR, which is also underway. We will continue to engage with the Children's Commissioner for Wales, and we have invited her to offer input and advice on all our actions.

In addition to the CPR, the Council also calls for a Public Inquiry into all circumstances surrounding this serious offending. It is the Welsh Government who has the statutory power to establish Public Inquiries and we therefore call on them to come to a decision as soon as possible.

We wish to turn every stone and be completely open and transparent. Otherwise, it will be impossible for us to fulfil our objectives effectively.

3. Objectives of this Response Plan

Six main objectives have been identified for this Plan. There may well be additional objectives as the situation becomes clearer after reviews and investigations are completed over time.

We commit to:

1. **Acknowledge** openly and publicly that such offences should never have happened, and that no child should suffer such experiences.
2. **Apologise** sincerely to the victims and survivors and their families for what they have had to suffer.
3. **Support** the victims and survivors, the school and the wider community to seek to recover their situations.
4. **Establish** all the facts of the case, the history around the situation and the wider context.
5. **Learn** all lessons identified as part of the findings and recommendations of all investigations.
6. **Improve** by responding in full and at pace to all findings and recommendations with the aim of giving confidence to the public that we are doing everything possible to ensure that no one will suffer in the same way ever again.

As we go about fulfilling the above, it is crucial that we are open and transparent at all times. In this respect, the Communication Plan in part 7 of this Response Plan is essential in order to ensure that we share information clearly, consistently and in a timely manner with all relevant stakeholders.

4. How do we intend to fulfil our objectives?

To fulfil our objectives in full, we will focus on four work streams as shown below. It is only by taking thorough, complete and timely actions to fulfil all the objectives of this Response Plan that we can have peace of mind that we have done everything possible to ensure recovery.

Work Stream A	Supporting the victims and survivors	Do everything within our ability to support the victims and survivors. Establish a caring relationship with the victims and survivors and ensure that the Council and the victims and survivors are "on the same side"
Work Stream B	Ensuring we have the best possible safeguarding arrangements today so that the public has trust and confidence in them.	Ensure that our safeguarding arrangements are robust and of the best possible standard
Work Stream C	Establish what has happened, learn and improve	Do everything possible to ensure that we fully understand everything that has happened and have identified any weaknesses. Embrace and implement the recommendations in order to learn and improve.
Work Stream Ch	Supporting and stabilising Ysgol Friars	Ensure that the current standard of education continues to be maintained, that staff are confident and that the school's Governing Body leadership is stable and effective.

Later in this Plan, we will explain the governance procedure for monitoring our progress and ensuring that we act in a timely manner. We must acknowledge clearly and openly that we have a long and challenging journey ahead to reach a situation where we are satisfied that we have taken full and appropriate action.

5. The Plan's Work Streams

Work Stream A – Supporting the victims and survivors

What has been achieved up to now?

A1 – Direct support

Following the first disclosure on 6 September 2023, support was provided to the offender's victims and survivors in order to support their direct needs and to give them hope about the next steps. Speedy access was provided to support officers and specialist counsellors, with Police Victim Liaison Officers leading from the first day.

The Police victim liaison officers now sit on the Child Practice Review (CPR), ensuring that the victims and survivors' voices are a core part of any discussion.

The support is ongoing, with this work being monitored continuously by a regional partnership group who run the Wales Victim Contact Scheme, in which the Council plays a key role. The scheme is recognised nationally and is extremely thorough.

Naturally, this support happens discreetly in the background and is tailored specifically for the support needs of individual victims and survivors.

A2 – Wider support in the school

The counselling services at the school were extended by working with organisations such as the Rape and Sexual Abuse Support Centre (RASASC) North Wales, ensuring specialist support for victims and survivors and other pupils who may have been affected. Regular reviews are held to ensure that the support continues to be suitable and effective. Fortunately, Ysgol Friars collaborated with a local company to create a well-being centre on the site in 2023, as well as qualified staff, which has been beneficial as an appropriate space for recovery and emotional support.

We will continue to review the support regularly and support is available to victims and survivors, pupils and staff.

What else needs to be delivered in order to meet our objectives?

A3 – Acknowledge and Apologise

We have already acknowledged and apologised publicly for what the young women and girls have suffered and part 2 of this Plan formally reaffirms our apology.

However, that is only a public statement, and it is the Council's responsibility and intention to offer a personal apology to each of the victims and survivors. With the support of the Wales Victim Contact Centre and the chair of the CPR, we have started on the journey of establishing how to offer that personal apology.

It must be borne in mind that each of the victims and survivors has suffered and our wish in acknowledging and apologising is to offer support towards their situation. It is essential that this work is led by the victims and survivors. We are continuing to receive advice and guidance from others who are more experienced than ourselves in such matters, while being very cautious that we do not do anything that would not be welcomed by the young women and girls.

A4 – Personal Support Plan

As part of our continued support to the victims and survivors, we will have a discussion with them to identify what further support we can offer them from now on. The needs of every child and young person who has suffered a trauma will be different and we need to be flexible and tailor any support to be in line with their needs. We will be open to provide any appropriate support to them to face the next phase of their lives.

A5 – Deal with applications for compensation

Compensation matters are complex and are issues which will be for others to decide upon in line with legislation and guidelines for such cases. Although we cannot discuss such matters in a Plan such as this, we know that these matters can take a long time to be resolved. We are eager to avoid this, as it will not be helpful to the well-being of the victims and survivors. We will, therefore, do everything possible to ensure that proceedings are resolved in a timely manner.

Work Stream B – Ensuring we have the best possible safeguarding arrangements today so that the public has trust and confidence in them.

What has been achieved up to now?

B1 – Corporate Safeguarding Arrangements

The Safeguarding Policy was reviewed during the second half of 2023, the new version adopted by Cabinet in February 2024 and the new version was submitted to the Full Council in March 2024. [Safeguarding Policy.](#)

The Cyngor Gwynedd Corporate Safeguarding procedures focus on ensuring the safety and well-being of children and adults who are at risk of being abused or neglected. All Council employees, elected members and partners have a responsibility to create an environment in which safeguarding is prioritised and where abuse is less likely to happen.

All Council departments are tasked with implementing safeguarding measures as part of their everyday actions, while the Social Services have a specific lead role in addressing cases where individuals are already at risk. At a corporate level, the Council ensures that staff and Members have been trained thoroughly, provide clear routes for reporting on concerns, and use the Disclosure and Barring Service (DBS) to ensure safer recruitment practices.

The corporate safeguarding efforts are co-ordinated via the Strategic Safeguarding Panel and the Operational Safeguarding Group, which oversee and monitor performance, policies and departmental compliance. It is the Panel's responsibility to review and update the Safeguarding Policy regularly to ensure that it continues to be effective and responsive to any legislative or procedural changes, reiterating the Council's commitment to safeguarding those who are vulnerable in the community.

B2 – Schools' Safeguarding Arrangements

Since the offender's arrest, the Schools Safeguarding Policy and training pack for schools have been updated.

Since April 2023, the Education Department's Lead Safeguarding Officer has held Safeguarding Arrangements Monitoring visits at 91 of the 94 schools in Gwynedd, with the remaining ones scheduled.

These visits include:

- Checking Safeguarding policies
- Checking training dates and levels
- Checking practical Safeguarding arrangements
- Asking the Designated Safeguarding Person, staff members and pupils about confidence levels and knowledge in relation to safeguarding
- Checking the content of the school's Safeguarding Arrangements Annual Audit
- Offering general support / guidance.

Every school in Gwynedd has a Designated Safeguarding Person (DSP) who plays a central role in ensuring effective child protection and safeguarding. The designated person is a senior member of staff and he / she has the authority and expertise in safeguarding matters and the responsibility for co-ordinating the school's child protection policies and procedures.

The individual acts as the main point of contact for all safeguarding concerns, providing advice, guidance and support for staff. The task of the designated person is to keep records of safeguarding concerns, ensure timely referrals to appropriate authorities and train school staff ensuring that everyone understands their safeguarding responsibilities. Their role is central to nurturing a safe and supportive environment for all pupils.

The designated person works closely with the Education Department's Safeguarding Lead Officer, who provides specialist advice, support and oversight to ensure the effective implementation of safeguarding and child protection policies across all schools in the county.

All schools receive a model policy from the Education Authority and each school is encouraged to make some modifications (e.g. modify the name of the school, and a designated safeguarding person relevant to the school) and adopt this policy, which has been drawn up in accordance with the requirements of recognised guidelines and standards. It is the responsibility of the governors to ensure that effective safeguarding policies have been adopted and are reviewed at least once a year and continual support is provided for the schools to achieve this. Governors must work with school leaders to create a safe environment, monitor compliance with safeguarding laws, and address any weaknesses or deficiencies in safeguarding practices in a timely manner.

The Education Authority currently holds a Safeguarding inspection in every school every two years, which is already beyond current requirements. Although there are no formal requirements to run such a programme, we believe it is extremely important and our intention to go even further in the future is explained in B5 below.

B3 – Estyn's Inspection of the Council's Education Department

Estyn held an inspection of the Gwynedd Education Department in June 2023 and as part of any inspection of an education authority, the inspectors follow the following process:

"In all inspections, inspectors must report on whether the arrangements of the local authority or other provider of education services for safeguarding satisfy the requirements and are not a cause for concern, or do not satisfy the requirements and cause serious concern.

"Inspectors will consider to what extent there is a culture of safeguarding across the education service which supports the welfare of all learners. Also, inspectors will consider how well the local authority or other provider of education services promote a culture of safeguarding in schools, PRUs and other providers who support the welfare of all learners.

"Inspectors will assess the robustness of procedures for checking the suitability of staff and other people who have contact with children, including maintaining a record of all staff who work with children and the outcomes of appropriate safeguarding recruitment checks. Inspectors will review the procedures for training staff and will check that all staff know how to respond to child protection matters.

"In inspections of local authorities, inspectors will evaluate how well the authority fulfils its statutory responsibilities in relation to safeguarding. Specifically, they will evaluate whether the authority has effective safeguarding arrangements in place, including:

- *strategic planning for, and oversight of, safeguarding in education, including reporting regularly to members*
- *appropriate support and guidance for all education services providers in its area, including the early years, play and youth support services*
- *pursue concerns noted during inspections of providers for whom it is responsible*
- *appropriate safeguarding practice in its direct education services such as education other than at school, PRUs and the youth service*
- *that appropriate arrangements are in place to ensure that all partnership work that is carried out, co-ordinated or funded by the local authority keep to a high safeguarding standard*
- *that there are appropriate policies, procedures and reporting arrangements in relation to physical interventions and being pulled out of lessons*
- *pursue concerns raised by stakeholders, including parents and carers, staff and pupils of providers for whom it is responsible"*

Their findings on the Authority's safeguarding arrangements were received:

"The head of education and his senior management team undertake their statutory role to protect and safeguard children robustly and effectively and relevant leaders at all levels understand their roles and responsibilities. There is a robust procedure for strategic and operational meetings in relation to safeguarding issues. The representation of the education services in these processes and as part of the Corporate Parenting Panel is consistent and influential. Leaders at all levels have developed a mutual understanding with corresponding officers in children's services. As a result, they work together intelligently and productively for the benefit of the authority's children.

"The corporate safeguarding policy is appropriate and the Education Services department provides a beneficial standardised safeguarding policy for schools, together with a large number of other relevant policies and guidelines. Clear guidance and valuable and beneficial support are given to headteachers and designated persons in schools by relevant officers, such as the designated safeguarding officer for education. Training arrangements for school staff at all levels, including governors, are robust. School headteachers welcome recent developments where the designated officer visits to check the quality and challenge the safeguarding arrangements of their schools. This has had a positive effect on strengthening the culture of safeguarding across schools in Gwynedd.

"The quality of implementation of Part 5 of the Wales Safeguarding Procedures, when there are allegations against professional staff, is extremely robust and very thorough. The support and challenge given to schools by other departments in the authority on safeguarding and health and safety issues is valuable and effective. This includes clear guidance from the property and personnel departments on specific issues and risk assessments. However, the authority has not considered risk carefully enough for the inclusion hubs. Safe recruitment arrangements are robust and consistent."

In addition to this, following the offender's arrest, there has been regular contact with the regulatory body and a meeting was held with them in December 2023. Following the meeting, the following comments were received from the inspector:

"We appreciate the detail which you discussed with us, including the steps taken to ensure the welfare and safety of pupils and staff and temporary leadership and governance arrangements. It is obvious that you have responded without delay to this complex matter. We know that your response includes urgent steps in the short term, comprehensive steps over the medium term and more strategic steps with the intention of offering long-term stability."

B4 – Estyn Inspections in specific Schools

In accordance with the National Inspection arrangements by Estyn, every school receives a full inspection on a cycle of approximately 5 years. During COVID-19 this procedure was suspended across the country. Since resuming the procedure, 36 Gwynedd Schools have received a full Inspection which includes a part which looks at the Safeguarding arrangements, following a similar process to that explained above.

Each one of these schools reached the expected standards for safeguarding arrangements.

What else needs to be delivered to meet our objectives?

B5 – Schools' Safeguarding Arrangements

Our current staffing arrangements allow us to hold Safeguarding Arrangements Monitoring Visits by the Lead Safeguarding Officer in every individual school every other year. We are not aware of other Authorities who do this in this way, but we believe that these inspections are valuable, and offer support to individual schools to ensure that their safeguarding arrangements are adequate and to offer them general support in this critical field.

We therefore believe that it would add more value if the frequency of these visits could be increased and that they happen every year in every school. We will therefore invest to increase the staffing resource we have in the Education Department in order to do this and strengthen our support structure for schools.

B6 – Scrutiny Investigation into Safeguarding Arrangements in Schools

Our scrutiny arrangements have a critical role to play as part of the Council's formal governance arrangements and given the seriousness of the situation we face it is quite appropriate for us to be scrutinising this field.

The item 'Safeguarding Arrangements in Schools' was added as an additional item to the Education and Economy Scrutiny Committee's annual work programme after the annual workshop at the request of scrutiny members, and the matter was scrutinised at the Committee meeting on 18 July 2024. Following this, the possibility of holding a Task and Finish Group or Scrutiny Investigation into the field was discussed. It was concluded that further discussion should take place on 5 September 2024 where the members expressed their desire to review and confirm that safeguarding arrangements are as tight as possible within our schools.

A brief for the Scrutiny Investigation will be considered by the Education and Economy Scrutiny Committee in February 2025 and will appear as Appendix A to this Response Plan once confirmed.

The main question to consider will be - *'Are the safeguarding arrangements in the county's schools appropriate and implemented consistently?'*

B7 – Input by the Children's Commissioner

Following discussions between the Children's Commissioner, officers and Cabinet Members in July 2024 and November 2024, and then a further meeting between the Chief Executive and the Commissioner on 9 December, the Commissioner was invited to provide input to our Response Plan and to be a part of the procedure for monitoring our progress on the various work streams.

That discussion is continuing and is a positive discussion.

We have stated our desire to collaborate openly and positively with the Commissioner and her officers and we appreciate the opportunities to have constructive discussions with them and receive their specialist and experienced input into fields such as these. Following our most recent discussions, the Commissioner intends to discuss the situation further with other relevant agencies in January, including Estyn, the Care Standards Inspectorate for Wales, the Education Workforce Council and Welsh Government. We look forward to further positive discussions with the Commissioner following this.

Work stream C – Establish what has happened, learn and improve

What has been achieved up to now?

C1 – Establish a Child Practice Review (CPR)

As noted in the first part of this Plan, the North Wales Safeguarding Board established a Child Practice Review (CPR) immediately after the court judgement and the Council stated its full support to the Review and committed to do everything possible to support it as well as implement all the recommendations immediately.

The Chair of the CPR, Jan Pickles, is an extremely experienced individual who has been leading high-profile reviews of this nature and has specialised in safeguarding children matters for many years. She is a registered social worker with extensive experience with the Probation Service, the Police and the NSPCC. She is a former Designated Safeguarding Officer at Westminster Council and is a former assistant Police Commissioner in South Wales. She was a member of the National Independent Safeguarding Board Wales for six years, until May 2022.

Amongst her recent work, Jan Pickles has led on and taken part in several high-profile investigations, including chairing the CPR into the sad case of Logan Mwangi in Bridgend. She is the author of the review into historical cases of child abuse in Winchester College and she chaired a review in a prominent school in London and worked as part of the review into historical cases (from the 1970s) of child sex abuse at Chelsea football club. She has also recently completed an independent review of historical cases of child abuse at Caldey Island monastery.

The Chair is supported by two independent investigators who are experienced in work of this nature. Work to gather evidence follows a structured process with the initial step focusing on meeting the victims and survivors and spending time at the school. The Investigators also continue to meet with relevant professionals and members of the public who have information they feel would support the review process. The Review Panel has focused on key matters such as the behaviour of the offender and professional conduct. Governance arrangements and managing disclosures are also under consideration in the review.

The following agencies are a part of the Review

- Cyngor Gwynedd
- Isle of Anglesey County Council
- Conwy County Borough Council
- North Wales Police
- Betsi Cadwaladr University Health Board
- North Wales Probation Service
- North Wales Regional Safeguarding Board

All evidence in the ownership of every agency has been collated and presented to the Investigators and they are in the process of creating a detailed timeline of all the relevant events.

In response to the developing situation, we used an external consultant to identify the cases of children and staff linked to Ysgol Friars and created an initial chronology with the intention of identifying any matter that required urgent attention. This information has been presented in its entirety to the CPR.

The Child Practice Review Panel continues to review the Terms of Reference, in order to reflect any new concerns that the review finds. Once the terms of reference have been established and finalised, we understand that it is intended to make it public. We have called on the Regional Safeguarding Board to do this as soon as possible. It is intended for the Terms of Reference to appear as Appendix B to this Response Plan.

The North Wales Safeguarding Board provides regular updates to the Welsh Government Safeguarding and Advocacy Unit regarding the progress of the review, although at present it is not expected for the review report to be completed until the end of Spring 2025.

The Council also meets with the Chair of the Panel regularly to receive updates on the process by her and two-way information sharing happens regularly and effectively.

C2 – Investigation into events in 2019 which have been the subject of press coverage

During the court case there was reference to specific events in 2019. These events have also had considerable press coverage. As already noted, the timetable and terms of reference of the CPR have extended considerably since Jan Pickles attended a meeting with Council Members before the summer. Consequently, and in light of public interest in these specific matters, as a Council we have commissioned an Independent Investigation into these specific matters in order reach conclusions sooner than the CPR timetable.

This work is already underway and is being completed by Genevieve Woods, who is a barrister at Raymond Buildings, London. She specialises in such investigations and has worked with Jan Pickles in the past on such matters. She has extensive expertise and experience of working on safeguarding matters as well as implementing independent investigations.

She has been commissioned to undertake an entirely independent investigation and not to represent the Council.

The purpose of the Independent Investigation is to establish all the facts of the events in question, consider their significance and relevance, decide whether acknowledged procedures were followed, whether appropriate action was taken under the circumstances, whether there are further steps the Council could consider and whether there are lessons to be learned.

This work is expected to be completed by January/February and the findings of this investigation will be provided to the CPR as well as reported back to us as a Council.

C3 – Review of the response to the report by the Independent Complaints Panel in 2019

In 2019 an Independent Complaints Panel was held in accordance with the complaints procedure in schools, to consider complaints against the Governing Body of Ysgol Friars. The Panel made several recommendations, and it is unclear as to whether those recommendations were implemented in full or not.

In response, the Council intends to hold an Independent Investigation into the way the recommendations in the Independent Complaints Panel's Report were responded to. The main purpose of this commission is to assess whether the School, Governing Body and Council responded adequately and appropriately to the findings of the Complaints Panel Report.

This work is expected to be completed by the end of February/March and the findings of this investigation will be provided to the CPR and also reported back to us as a Council and to the Governing Body.

C4 – Investigation into arrangements for dealing with requests under the Freedom of Information Act

Due to the exceptional number of freedom of information requests we have received as a result of this exceptional case (mainly from the press) we did not manage to answer everything within the usual timescales. All these requests needed to be considered in accordance with the Freedom of Information Act. This meant reviewing the information and considering whether exceptions needed to be applied to ensure e.g. that individuals' personal data or child protection matters were not released inappropriately. We answered every request and either released the information, if appropriate to do so, or implemented an appropriate statutory exception.

In order to give assurance that we have acted appropriately we have asked the Information Commissioner's Office (ICO) if they would be able to undertake a voluntary audit of the Council's arrangements in relation to responding to requests for information to the Council in the context of the Freedom of Information Act (2000) as soon as possible. That will include compliance with the expectation to respond within the relevant timeframes and the use of exceptions permitted under the Act.

Further information about an audit of this nature can be found on the ICO website – [Audits | ICO](#)

The timeframe of this work is dependent on the ICO and we are currently discussing the timescales with them.

What else needs to be delivered to meet our objectives?

C5 – Respond to the findings of current Investigations

The above-mentioned Investigations and Reviews are all underway, some about to be completed and others only just starting on the work. We have tried to note a likely timeframe for completing every individual piece of work and we will do everything possible to keep to that timeframe. Several pieces of work depend on the workload of the Independent Investigators and on the input required by those who will have information and evidence to contribute, which could influence our ability to complete everything on time.

In due course, we will receive the findings of the above-mentioned investigations and we will need to act on the various findings and recommendations. What will be expected of us will depend on those findings and recommendations and therefore we will need to review this part of the Response Plan after receiving the reports in question.

We know that a CPR Review is extremely thorough and is bound to identify findings and recommendations that we will need to act on. There is a possibility that some of the recommendations will ask us to also establish other investigations ourselves, at which point we will need to amend this part of the Response Plan.

We have stated clearly from the beginning that we will embrace all the recommendations from every investigation and will implement them in full and without delay, and it is appropriate for us to reaffirm this here.

Work Stream Ch – Supporting and stabilising Ysgol Friars

What has been achieved up to now?

Ch1 – School Support Plan

Following the offender’s arrest on 6 September, immediate and responsive support was provided to the school, and a School Support Plan was adopted which included external critical guidance. From October 2023 until March 2024, Sarah Sutton was appointed as a critical friend to the Acting Head, whilst Margaret Davies was appointed to support the Well-being Deputy Head. Margaret Davies continues to work with the school.

In order to support the school and the welfare of staff throughout this challenging time, the Human Resources Advisers Team Leader and Assistant Head of the Education Department with responsibility for supporting the secondary sector provide supervision and operational support.

In addition, a teacher with significant experience in inclusion who until recently worked in another Secondary School within the County offers further support for between three and four days a week.

Since September 2023, the Education Department has been providing continuing support and resources to the School, which includes the contribution and expertise of all staff of the Education Department, ensuring stability and continuous support for the recovery of Ysgol Friars. Support was provided to review their safeguarding policies and new policies have been adopted by the school.

Officers from the Education Department have been meeting Union representatives regularly as well, taking the opportunity to listen to concerns and try to share timely information with them. It must be acknowledged that recent times have been extremely challenging for the school's staff and we must thank them very much for being able to maintain the standard of education and care for pupils despite all of this.

Ch2 – Amending the Governing Body

Following the offender’s sentence in May 2024, the Council reviewed the Authority's membership on the Governing Body including appointing four Members on behalf of the Authority.

In addition, other members have left and by now 14 out of the 19 members of the Governing Body are new to their role, with a new Chair appointed.

Ongoing support is given by Officers of the Education Department in order to provide training and practical support to the new governors of the School.

The Authority now provides clerking support to the Governing Body.

Ch3 – Changes to the Senior Leadership Team

The School's Senior Leadership Team has seen substantial changes since the offender's arrest. As well as the offender's imprisonment, another member of the team retired at the end of the Christmas 2023 term and the Acting Head has also stated his intention to leave the School in Easter 2025.

The responsibilities of the Designated Safeguarding Officer who was a part of the Senior Leadership Team have also been transferred to a different member of staff.

In the meantime, the School has received supervision from Margaret Davies, who is an experienced head in a school in another county.

Ch4 – Appointment of Interim Head

After significant recruitment challenges, Lynne Hardcastle has been appointed as acting Head to provide leadership in the period between November and the end of December 2024, initially.

Margaret Davies was appointed Head of the school for 4 terms from Easter 2025 until August 2026. The extended period in the role will be an opportunity to stabilise the school and review the operational arrangements thoroughly. It will also give an opportunity to support staff for an extended period and will give faith to the parents that the school is under new, experienced leadership with a strong background in safeguarding.

What else needs to be delivered to meet our objectives?

Ch5 – Appointment of a new Permanent Head

Until now, the Governors have not been able to appoint a new permanent Head for the School which is why the temporary arrangements have been put in place. The appointment of Margaret Davies until the end of the Summer Term 2026 will give the school an opportunity to stabilise and start a new chapter.

Before the end of that period, the school will start a recruitment process to appoint a new permanent Head.

Ch6 – Commission to review operational arrangements at the school

As the new Governing Body establishes itself, and as the interim head has the opportunity to review all the school's arrangements, we as a Council will support them to undertake a piece of work to compare Ysgol Friars' operational arrangements with the operational arrangements in the rest of the county's schools, trying to identify differences in order to consider whether there are any operational changes that need to be made.

This work is intended to be accomplished jointly between the new Governing Body and the Education Department, reporting back during 2025 and before starting the recruitment process of a new head.

Ch7 – Supporting Gwynedd School Governors

This part of the Scheme applies to all schools and not to Ysgol Friars specifically.

The Education system that currently exists places the responsibility on Governing Bodies (as a separate entity from local Government Education Departments) to be responsible for all individual schools. These Bodies are a combination of Governors who represent various stakeholders in schools and are voluntary functions.

In order to support Governors in fulfilling their role arrangements are in place to provide training and support. These arrangements often derive from national guidelines and the training has been provided on a regional basis.

The national system places a significant burden and responsibilities on the Governing Bodies and very often fulfilling the role is extremely challenging, especially on a voluntary basis for a few hours here and there. Their range of duties and responsibilities is wide and challenging including matters of finance, staffing, buildings, standard of education etc. Governors also face, and embrace, the challenge of promoting pupils to be complete and healthy citizens, promoting propriety and fairness towards everyone, including the successful introduction of the new Relationships and Sexuality Education Curriculum.

We believe that a national discussion is needed on the suitability of the current system and the burden that is placed on the shoulders of Governors, and we would ask the Government to consider this.

In the meantime we need to ensure that we offer the best possible training and support to the governors of all our schools and therefore we will review our current arrangements to try and ensure that these volunteers feel confident to carry out their role and receive the appropriate support.

6. Ownership and governance arrangements of the Plan

It is the Council's Cabinet that has commissioned this Response Plan.

It is recommended that a specific Programme Board be established with agreed Terms of Reference, to co-ordinate and ensure appropriate and timely progress, and that the Programme Board should invite input from relevant external bodies such as Estyn, Welsh Government, North Wales Safeguarding Board and the Children's Commissioner. It is recommended that an Independent Chair or Critical Friend from outside the Council should be appointed for the Programme Board, who has the relevant background and experience to facilitate challenging the delivery and implementation.

The Programme Board will report to Cabinet at regular intervals, to be confirmed in the agreed Terms of Reference referred to above.

There will also be a role for the Education and Economy Scrutiny Committee to scrutinise the progress and delivery (as well as completing the Scrutiny Investigation noted in part B5).

The content of this Plan will need to be reviewed regularly and as the situation develops, and specifically in order to respond to part C6 of the Plan. This is a live plan, and it is unavoidable that it will change as we move from the investigation and learning phase to the recovery phase.

It is unavoidable that progress will be difficult to measure as many matters will be open to personal opinion. One measure of progress will be completing all the individual steps which have been identified in Work Streams A to Ch. However, it must be acknowledged that delivering all of this will be a long-term process and we will commit to doing so, come what may.

7. Communication plan

Communicating clear, open and timely messages has been very difficult to date. The situation has changed regularly as new information has emerged and as those matters have been discussed publicly or in the press. Often, these matters are involved with the individual cases of children and/or adults and therefore the information is often personal and confidential.

Restrictions on our ability to communicate proactively have been frustrating and without doubt have contributed to creating negative public perceptions. As we move into a new period of investigating and receiving findings, we must ensure that we plan proactively to communicate important messages with different audiences and stakeholders, whilst recognising that those harmed by the offender are a special group to which we will provide feedback in a way of their choosing and this will be reflected in the communication plan.

To this end, a Communication Plan can be seen in Appendix C. This will be updated regularly.