

Appendix 2

Programme Board – Response Plan

Progress Report – 8 December 2025

| Theme 1 - Voice of the Child and Supporting Victims Reporting Officer: Gwern Ap Rhisiart | |
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| 1. Theme Aim: | <ul style="list-style-type: none"> Ensuring that children are listened to, believed, and taken seriously. Giving children and young people a voice in processes designed to keep them safe. To do everything within our ability to support the victims and survivors. |
| 2. Guidance sought from the Board: | <p>We ask the Board to;</p> <ul style="list-style-type: none"> Challenge and scrutinize progress Offer any further guidance on the next steps. <p>Specific guidance:</p> <ul style="list-style-type: none"> Should we move forwards ourselves or wait for WG material? (e.g. CPR-3) |
| 3. Progress to date: | <ul style="list-style-type: none"> Task and finish group established across Education and Children’s Departments to develop a draft policy (Voice of the Child) with the input of the youth forum. Education Department has incorporated information on “grooming” into the school safeguarding training package for the start of the academic year (Sept 2025) Young People Forum Coordinator employed to help consult with the County Youth Forum - giving young people the opportunity to voice their opinion and contribute to discussions. Working closely with RASAC Gogledd Cymru to ensure suitable, tailored personal support plans are in place for victims Initial scoping work done to understand current activity across the Council relating to children’s voice, participation, and rights (Chair of the Board, Sally Holland, will facilitate a workshop on Children’s Rights for the Board in February 2026). |
| 4. Challenges faced: | <ul style="list-style-type: none"> Resources: Corporate bid prepared to secure additional staff to support the implementation of CPR-6 (ensure that Children’s Social Care always speaks directly with the child, even if the child has not made a disclosure). Awaiting further guidance: CPR-3 Information about “grooming” in the school safeguarding package – should we move forwards ourselves or wait for WG material? |
| 5. Next steps / key milestones: | <ul style="list-style-type: none"> Develop a policy on listening to the voice of the child – by April 2026 |

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| | <ul style="list-style-type: none"> • Implement training for staff to recognise and document behavioural changes in children that could signal grooming or abuse – by March 2026. • Supporting victims of trauma and tailoring support to correspond with the individual's needs – Ongoing • Roll out new Bromcom system across all Gwynedd schools, alongside training and awareness raising campaign – by September 2027 • Review the feedback gathered from the County Youth Forum and seek approval for any proposed actions – January 2026 • Create a practical action plan that sets out clear priorities, responsibilities, and timelines for embedding a child-centred culture across all services – by April 2026 | | | | | | | | | | | | | | | | | | | | | | | | |
| 6. Risks/Resources: | <ul style="list-style-type: none"> • TBC – dependant on feedback from the Youth Forum | | | | | | | | | | | | | | | | | | | | | | | | |
| 7. Timescales: | <table border="1"> <tr><td>CPR - 1</td><td>April 2026</td></tr> <tr><td>CPR - 2</td><td>April 2026</td></tr> <tr><td>CPR - 3</td><td>March 2026</td></tr> <tr><td>CPR - 4</td><td>Sept 2027</td></tr> <tr><td>CPR - 6</td><td>Tbc</td></tr> <tr><td>CPR - 7</td><td>January 2026</td></tr> <tr><td>CPR - 8</td><td>Tbc</td></tr> <tr><td>CPR - 9</td><td>Ongoing</td></tr> <tr><td>RP - A4</td><td></td></tr> <tr><td>RP - A1</td><td></td></tr> <tr><td>RP- A5</td><td>Ongoing</td></tr> <tr><td>NEW - 1</td><td>March 2026</td></tr> </table> | CPR - 1 | April 2026 | CPR - 2 | April 2026 | CPR - 3 | March 2026 | CPR - 4 | Sept 2027 | CPR - 6 | Tbc | CPR - 7 | January 2026 | CPR - 8 | Tbc | CPR - 9 | Ongoing | RP - A4 | | RP - A1 | | RP- A5 | Ongoing | NEW - 1 | March 2026 |
| CPR - 1 | April 2026 | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 2 | April 2026 | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 3 | March 2026 | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 4 | Sept 2027 | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 6 | Tbc | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 7 | January 2026 | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 8 | Tbc | | | | | | | | | | | | | | | | | | | | | | | | |
| CPR - 9 | Ongoing | | | | | | | | | | | | | | | | | | | | | | | | |
| RP - A4 | | | | | | | | | | | | | | | | | | | | | | | | | |
| RP - A1 | | | | | | | | | | | | | | | | | | | | | | | | | |
| RP- A5 | Ongoing | | | | | | | | | | | | | | | | | | | | | | | | |
| NEW - 1 | March 2026 | | | | | | | | | | | | | | | | | | | | | | | | |

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| Theme 2 - Managing Allegations and Concerns about Adults working with Children | |
| Reporting Officer: Dylan Owen | |
| 1. Theme Aim: | <ul style="list-style-type: none"> • Protect children by ensuring concerns are taken seriously and acted upon quickly. • Ensure that Section 5 arrangements support a consistent and robust multi-agency response to allegations and concerns about adults working with children. |
| 2. Guidance sought from the Board: | <p>We ask the Board to;</p> <ul style="list-style-type: none"> - Challenge and scrutinise progress - Offer any further guidance on the next steps. <p>Specific guidance:</p> <ul style="list-style-type: none"> - CPR-15, RP-C2, RP-C2a – are the Board satisfied with the decision to wait for Welsh Government Guidance? |
| 3. Progress to date: | |

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| | <p><u>Section 5 Referrals:</u></p> <ul style="list-style-type: none"> • Every child involved in the referral (in some instances where the child has referred another child and the disclosure is not about them) is visited and listened to by a social worker. • Amended Strategy discussion and strategy meeting templates so that previous safeguarding information on the child's records is captured and shared. • The referral form has been added to the website under Child Abuse, Children and Family Support, and Keeping Pupils Safe. An email has also been sent to all Gwynedd school headteachers with the form attached as a reminder. • Currently referrals are screened by the IAA and discussions take place with either the LADO or the DOS as to the need to instigate Part 5 procedures. <p><u>Low-Level Concerns Policy</u></p> <ul style="list-style-type: none"> • A scoping exercise on the Policies used in England has been completed. • On 18.11.25, staff from Education, Safeguarding (Children and Adults) and Human Resources met to consider what Gwynedd could implement while awaiting clarification from the Welsh Government. <p><u>Schools Safeguarding and Well-being Team</u></p> <ul style="list-style-type: none"> • The team has advertised for a 4th member. 9 have applied, there will be appointment before the end of this term. • The Safeguarding and Well-being Team meets with operational management Teams (Children's Department) to ensure a better understanding of roles. |
| <p>4. Challenges faced:</p> | <p><u>CPR-12: It is a requirement that thresholds for invoking the procedures are decided at a multi-agency meeting and not solely by the LADO, and take into consideration previous concerns, complaints and allegations.</u></p> <p>Coordinating multi-agency threshold decisions can be time-consuming and difficult to schedule, which risks delaying urgent safeguarding actions. The Children's Department will work with North Wales Police and partner agencies to explore options such as regular scheduled meetings. Further discussion is anticipated on this matter and viability across the region at the December NWSB.</p> <p><u>CPR-15, RP-C2, RP-C2a - Welsh Government consider requiring schools to develop an 'Adult Conduct of Concerns Policy' (known in England as a Low-level Concerns Policy) considering producing guidance on safe working practice.</u></p> <p>Due to concerns about:</p> |

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| | <p>1. The limited value of a Gwynedd-only approach when staff frequently work across the North and Mid Wales region,</p> <p>2. data management implications, and</p> <p>3. HR and fair work issues, including the absence of a statutory definition of “low-level concerns”,</p> <p>The decision was made to delay implementing a Low-Level Concerns Policy until national guidance is issued by the Welsh Government.</p> <p>In the meantime, the Council is considering reinstating a central record of staff involved in Part 5 safeguarding processes, but with clearer criteria and definitions. It is engaging with neighbouring local authorities to review their approaches and identify elements that could be adopted in Gwynedd.</p> |
| <p>5. Next steps/key milestones:</p> | <ul style="list-style-type: none"> • The plan is to recruit an additional Designated Officer for Safeguarding (DOS) who will also develop an audit plan for the Department. The audit plan will include reviewing who attends strategy discussions and the quality of decision-making records. • Set up regular joint manager meetings (e.g., quarterly) to strengthen collaboration between the Education and Children and Supporting Families Departments. • A further meeting is planned with Adult Services to consider wider implications for Safeguarding threshold decision making. • Work with the IT department to develop a digital version of the referral form so that users no longer need to download a PDF and send through an email. To note that the form is a regional document and there are currently plans to adopt a nationwide single referral form. |
| <p>6. Risks/Resources:</p> | <p>Resources:</p> <ul style="list-style-type: none"> • Employ additional DOS who will also lead on the Audit Framework for the Department. • The Department will assess whether additional resources or staffing will be necessary to support the recommendation that multi-agency discussions take place to assess thresholds for any concerns involving individuals in positions of trust. <p>Risk:</p> <ul style="list-style-type: none"> • Ensuring ownership of systems change by the workforce. |

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| 7. Timescales: | CPR -11 | tbc |
| | CPR - 14 | Tbc |
| | RP- B5 | Ongoing |
| | CPR - 15 | Oct 25 – |
| | RP- C2 | April 26 |
| | RP - C2a | |
| | CPR - 12 | Tbc |
| | CPR - 5 | Sept 25 |
| | NEW- 2 | Ongoing |
| | NEW- 3 | Ongoing |
| | NEW- 4 | tbc |
| | NEW - 5 | Ongoing |
| | NEW- 6 | Ongoing |
| | NEW- 7 | Ongoing |
| | CPR - 10 | Tbc |
| | CPR 16 | tbc |
| | RP- B2 | Ongoing |
| | NEW- 8 | Ongoing |
| NEW- 9 | Ongoing | |
| NEW- 10 | Ongoing | |

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| Theme 3 - Training and Policies | |
| Reporting Officer: Ian Jones | |
| 1. Theme Aim: | <ul style="list-style-type: none"> Ensuring that staff are trained to “think the unthinkable” and understand that “it could happen here” |
| 2. Guidance sought from the Board: | <p>We ask the Board to;</p> <ul style="list-style-type: none"> Challenge and scrutinize progress Offer any further guidance on the next steps. <p>Specific guidance:</p> <ul style="list-style-type: none"> CPR-18, 19 - Should we add slides on Finklehor model into training packages or await development of a recognised training? |
| 3. Progress to date: | <ul style="list-style-type: none"> Whistleblowing Policy has been amended and circulated with the Board for comments (see <i>Agenda item 5</i>). Safeguarding and Well-being Team within the Education Department provides information, advice and support to the Designated Safeguarding Persons in schools across Gwynedd. Appointment of Safeguarding Champion role to promote and raise awareness All department’s performance dashboard reports on the % of staff who have completed Safeguarding and VAWDASV training with regular monitoring in place over mandatory training uptake. All schools have received a Monitoring Visit within the past two years, and an annual visiting schedule is in |

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| | place since January 2025 onwards (this goes beyond the national guidance of a visit every 2 years). | |
| 4. Challenges faced: | <ul style="list-style-type: none"> • Dependencies around training provision from other bodies, e.g. <ul style="list-style-type: none"> ○ No recognised training provision in place for modus operandi of sex offenders and sex offender grooming (Finklehor model) ○ Awaiting response from Social Care Wales to determine how the training delivered in Gwynedd can be adapted (additional safeguarding record-keeping training) ○ Regular training and supervision of LADO • RP-B6 – <i>Scrutiny inspection of safeguarding arrangements</i> - Expected to report to Scrutiny Committee in December 2025 but this has slipped to 12 February 2026 due to the process of procuring and appointing external provider to undertake research on voice of the child. | |
| 5. Next steps/key milestones: | <ul style="list-style-type: none"> • Adopt amended whistleblowing policy – Cabinet (Jan 26), Full Council (March 26) and implement the policy (April 26) • Clear communication plan for all Council staff, ensuring it meets the needs of frontline teams – November 2025. • Subgroup to develop and produce practical tools to reinforce and promote the importance of safeguarding training across the Council - Tbc • Add additional safeguarding record-keeping training to the existing e-module with SCW agreement - November 2025. • Scrutiny Inspection Report (Safeguarding Arrangements) - February 2026 • Further review of Corporate Safeguarding Policy – April 2026 | |
| 6. Risks/Resources: | <ul style="list-style-type: none"> • Resources: CPR –24 - With almost 100 Designated Safeguarding Persons in schools (not including deputy DSP's), additional resources will be needed to implement this recommendation effectively. • Resources: RP-B2 - Work to be done on email accounts for staff (particularly frontline) to enable them to complete mandatory training. Bid has been submitted for significant funding in order to improve this. | |
| 7. Timescales: | CPR - 17 | Tbc by WG |
| | CPR - 18 | Tbc |
| | CPR - 19 | Tbc (see CPR-18) |
| | CPR - 20 | April 2026 |
| | CPR -13 | Tbc |
| | CPR - 24 | Tbc |
| | RP- C2 | December 2025 |

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| | RP- B1b | Ongoing | |
| | RP- B2 | Completed | |
| | RP- C2d | Ongoing | |
| | NEW- 11 | Tbc | |
| | RP- B1 | April 2026 | |
| | RP- B2 | Tbc | |
| | RP- B1a | June 2026 | |
| | RP- B1c | Completed | |
| | RP- B5 | Completed | |
| | RP- B6 | December 2025 | |

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| Theme 4 - Governance | |
| Reporting Officer: Tbc | |
| 1. Theme Aim: | <ul style="list-style-type: none"> • Ensure that school governors understand their roles and responsibilities or keeping children safe • Ensure there are systems in place that measures the wider health and culture of schools |
| 2. Guidance sought from the Board: | <p>We ask the Board to;</p> <ul style="list-style-type: none"> - Challenge and scrutinize progress - Offer any further guidance on the next steps. <p>Specific guidance:</p> <ul style="list-style-type: none"> - Timescales are a risk at present – anticipate the WG review will take between 6 and 9 months. Can we move forwards sooner with some of the recommendations? How? |
| 3. Progress to date: | <ul style="list-style-type: none"> • Mandatory safeguarding training in place for all Chairs and Designated Governors for Safeguarding in schools. • Made it mandatory for Governors to complete basic safeguarding training • New governor handbook shared with all governors • Started collating information to assess school's situation including wider health and culture |
| 4. Challenges faced: | <ul style="list-style-type: none"> • Dependencies - awaiting further guidance from WG following its review of Governance arrangements within schools |
| 5. Next steps/key milestones: | <ul style="list-style-type: none"> • Education department to develop and circulate a fixed agenda / program for the governing bodies of Gwynedd schools, which will focus on safeguarding and welfare issues, together with providing the appropriate data to help them assess the schools' situation • Respond to recommendations from WG review of Governance arrangements within schools in Wales |
| 6. Risks/Resources: | <ul style="list-style-type: none"> • Resources: RP-Ch7 - We will need an additional officer to support 94 governing bodies. Currently we have one officer. We have received a grant from WG that will allow us to appoint an additional officer. |

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| | <ul style="list-style-type: none"> • Resources: CPR-22 - We will need resources to create a dashboard that would facilitate the collection of such data. | |
| 7. Timescales: | CPR - 21 | tbc |
| | CPR - 22 | tbc |
| | CPR - 23 | tbc |
| | RP- C3 | tbc |
| | RP- Ch7 | tbc |
| | RP- Ch6 | May 2026 |
| | NEW- 12 | tbc |

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| Theme 5 – Restrictive Practices | |
| <i>Reporting Officer: Tbc</i> | |
| 1. Theme Aim: | <ul style="list-style-type: none"> • Update guidance about filming restraint by adults, and how filmed records should be kept. |
| 2. Guidance sought from the Board: | <p>We ask the Board to;</p> <ul style="list-style-type: none"> - Challenge and scrutinize progress - Offer any further guidance on the next steps. |
| 3. Progress to date: | <ul style="list-style-type: none"> • Perpetrator acted contrary to the Schools Policy by filming cases - this is not standard practice. • During QA visits we always look at the restrictive practice policy to ensure that it coincides with the model policy provided. Training is provided for free through the inclusion team. |
| 4. Challenges faced: | <ul style="list-style-type: none"> • Need to hold an internal discussion on the use of reasonable force, especially as there are currently two types of training available that teach different techniques. Education Department have specialist who are trained in CPD field and therefore harmonizing the training methods would be a good starting point to ensure a clear, consistent and safe approach across the services. |
| 5. Next steps/key milestones: | <ul style="list-style-type: none"> • Review the Councils policy on Restrictive Practices and ensure all schools adopt the model policy |
| 6. Risks/Resources: | <ul style="list-style-type: none"> • tbc |
| 7. Timescales: | <ul style="list-style-type: none"> • tbc |

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| Theme 6 - Crisis Planning and Crisis Response | |
| <i>Reporting Officer: Catrin Love</i> | |
| 1. Theme Aim: | <ul style="list-style-type: none"> • Ensure there is a clear, strategic and coordinated plan in place in the event of a crisis |
| 2. Guidance sought from the Board: | <p>We ask the Board to;</p> <ul style="list-style-type: none"> - Challenge and scrutinize progress - Offer any further guidance on the next steps. |
| 3. Progress to date: | <ul style="list-style-type: none"> • Internal task group set up to review current plans in place at strategic and operational level to respond to |

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| | <p>critical incidents. The work will draw on good practice regionally and nationally.</p> <ul style="list-style-type: none"> Guidelines in place for the Governing Body (Safeguarding Policy) since 2019. The education department will undertake checks to ensure staff are aware of this. | | | | | | | | | | |
| 4. Challenges faced: | <ul style="list-style-type: none"> tbc | | | | | | | | | | |
| 5. Next steps/key milestones: | <ul style="list-style-type: none"> Draft plan in place by December 2026 Once plan is agreed, there will need to be a programme of implementation and training (April 2026) | | | | | | | | | | |
| 6. Risks/Resources: | <ul style="list-style-type: none"> Tbc | | | | | | | | | | |
| 7. Timescales: | <table border="1"> <tr> <td>CPR - 26a</td> <td>Draft plan by 31/12/25</td> </tr> <tr> <td>CPR - 26b</td> <td>tbc</td> </tr> <tr> <td>CPR - 26c</td> <td>tbc</td> </tr> <tr> <td>CPR - 26d</td> <td>April 2026</td> </tr> <tr> <td>PR- C2e</td> <td><i>Completed</i></td> </tr> </table> | CPR - 26a | Draft plan by 31/12/25 | CPR - 26b | tbc | CPR - 26c | tbc | CPR - 26d | April 2026 | PR- C2e | <i>Completed</i> |
| CPR - 26a | Draft plan by 31/12/25 | | | | | | | | | | |
| CPR - 26b | tbc | | | | | | | | | | |
| CPR - 26c | tbc | | | | | | | | | | |
| CPR - 26d | April 2026 | | | | | | | | | | |
| PR- C2e | <i>Completed</i> | | | | | | | | | | |