



# Child Protection and Safeguarding Policy

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## **Implementation Checklist and Key Safeguarding Overview**

### **Cameron and Cooper Limited – March 2025**

This document clearly summarises key safeguarding responsibilities and procedures to ensure all adults at Cameron and Cooper Limited can consistently apply and uphold our safeguarding practices.

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#### **The 5 Essential Rs of Safeguarding:**

- **Recognise:** Clearly identify signs and symptoms of abuse, neglect, or safeguarding concerns.
  - **Respond:** Act promptly and appropriately, prioritising the child's immediate safety and emotional wellbeing.
  - **Report:** Immediately notify the Head of Safeguarding, DSL, or your line manager.
  - **Record:** Accurately document all incidents using Clear Care, maintaining GDPR compliance.
  - **Refer:** Promptly escalate unresolved concerns internally or to external agencies as necessary.
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#### **Immediate Responsibilities for Adults:**

- Be vigilant, proactive, and responsive.
  - Always prioritise the safety and wellbeing of young people.
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#### **Key Contacts:**

1. **Head of Safeguarding: Wayne Grey**
  2. **Designated Safeguarding Leads (DSLs):** Clearly identified within each home or service.
  3. **Director: Camilla McInnes**
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#### **Core Safeguarding Practices:**

##### **Reporting and Documentation:**

- Use Clear Care to clearly document all safeguarding concerns immediately.
- Ensure all records are confidential, secure, and GDPR compliant.

##### **Support for Adults:**

- Monthly reflective group supervision.
- Optional 1:1 sessions available.
- Regular supervision meetings with line managers.
- Access to the Employee Assistance Programme (EAP).

##### **Monitoring and Evaluation:**

- Regular review during supervision, team meetings, and weekly risk register meetings.

##### **Photography and Videography:**

- Clearly obtain consent for all images and videos.
- Ensure secure storage and GDPR-compliant management upon young person's transition from care.

##### **Behaviour Management:**

- Consistently apply Team Teach principles.
- Physical intervention is only used as a last resort and must be proportionate, necessary, and documented clearly.

##### **Whistleblowing and Escalation:**

- Report serious unresolved concerns internally or externally to the LADO or Ofsted.
- Whistleblowers are fully protected when reporting concerns in good faith.

**Ensure regular reference to this checklist to maintain clarity, consistency, and effective safeguarding practice at all times.**

## **Introduction**

### **Purpose of the Policy**

At Cameron and Cooper Limited our primary commitment is to provide a safe, nurturing, and supportive environment where every child and young person can thrive. We believe that love, care, and consistency are the cornerstones of effective safeguarding and child protection. These values are not just words to us—they are the guiding principles that permeate every aspect of the care we provide.

This Safeguarding and Child Protection Policy reflects our unwavering dedication to ensuring the safety, well-being, and protection of all children and young people in our care. We recognise that every child deserves to feel loved, cared for, and secure, and we are committed to creating an environment where they can develop trust, build resilience, and achieve their full potential.

This policy ensures compliance with the Children’s Homes (England) Regulations 2015, The Children’s Act (1989/2004), Working Together to Safeguard Children (2023), Keeping Children Safe in Education (2024), and the Ofsted Social Care Common Inspection Framework (SCCIF). It applies to all adults at Cameron and Cooper Limited, including permanent and temporary adults at Cameron and Cooper Limited, volunteers, and contractors.

At Cameron and Cooper Limited, we understand that safeguarding is not just a procedural obligation—it is a moral imperative. By embedding love, care, and consistency into every interaction, decision, and practice, we strive to create a home where children and young people feel valued, respected, and protected. This policy outlines our approach to safeguarding, the roles and responsibilities of the adults at Cameron and Cooper Limited, and the procedures we follow to ensure the highest standards of care and protection for every child.

Together, we are committed to fostering an environment where children and young people can grow, flourish, and experience the love and stability they deserve.

### **Love, Care, and Consistency**

At Cameron and Cooper Limited, we believe that safeguarding is not just about protecting children and young people from harm—it is about creating an environment where they feel loved, cared for, and secure. Our approach to safeguarding is rooted in the values of love, care, and consistency, which guide every decision, interaction, and practice within our home.

- **Love:** We are committed to showing unconditional positive regard for every child and young person in our care. This means treating each child with kindness, empathy, and respect, and ensuring they feel valued and supported at all times. Love is the foundation of trust, and we strive to build trusting relationships that enable children to feel safe and understood.
- **Care:** We prioritise the physical, emotional, and psychological well-being of every child. The adults at Cameron and Cooper Limited are trained to provide compassionate, person-centred care that meets the unique needs of each individual. We recognise that care is not just about meeting basic needs but also about nurturing growth, resilience, and self-esteem.

- Consistency: We understand that children thrive in environments where they know what to expect. Consistency in our routines, boundaries, and responses helps children feel secure and builds their confidence in the care we provide. By maintaining clear, predictable, and fair practices, we create a stable foundation for their development.

These values are embedded in all aspects of our safeguarding practices, from the way we recruit and train the adults at Cameron and Cooper Limited to the procedures we follow when responding to concerns. We believe that by promoting a culture of love, care, and consistency, we can create environments where children and young people feel truly safe, supported, and empowered to reach their full potential.

## **Legal and Regulatory Framework and other supporting Cameron and Cooper Limited Policies**

Cameron and Cooper Limited adheres to the following key legal and statutory frameworks:

- [Children Act 1989 and 2004](#)
- [Care Standards Act 2000](#)
- [Children's Homes \(England\) Regulations 2015](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Keeping Children Safe in Education \(2024\)](#)
- [The Ofsted SCCIF for Children's Homes](#)
- [The Data Protection Act 2018 and GDPR](#)
- [The Equality Act 2010](#)
- Promoting Positive Behaviour and Relationships Policy
- Complaints Policy
- Whistleblowing Policy
- Substance Misuse Policy
- Missing from Care Policy
- Health and Safety Policy
- Equality, Diversity, and Inclusion Policy
- Countering Bullying Policy
- Online Safety Policy
- On-call Policy
- Self-Harm Response Policy

This policy aligns with the latest safeguarding legislation, guidance, and best practices to ensure compliance and accountability.

## **Definitions, Types, Signs, and Symptoms of Abuse**

### **Definitions**

Safeguarding and child protection are central to our work at Cameron and Cooper Limited. Safeguarding refers to the proactive measures taken to promote children's welfare and protect them from harm, including abuse, neglect, exploitation, and other risks. Child protection is a specific aspect of safeguarding, focusing on responding to concerns where a child is suffering or is at risk of suffering significant harm.

**Abuse can take many forms, but the four primary categories are:**

- **Physical Abuse – Deliberate harm such as hitting, shaking, or inflicting injuries. Adults at Cameron and Cooper Limited must be vigilant for unexplained injuries, bruising in children, and inconsistent explanations.**
- **Emotional Abuse – Persistent emotional maltreatment that negatively impacts a child’s self-esteem and development. This includes verbal abuse, threats, humiliation, rejection, or excessive criticism. Warning signs may include low self-confidence, withdrawal, or fearfulness.**
- **Sexual Abuse – Forcing or enticing a child to take part in sexual activities, whether or not they are aware. This includes physical contact and non-contact abuse, such as grooming, exploitation, or exposure to sexual content. Indicators may include distress, inappropriate sexualised behaviour, or difficulty trusting adults.**
- **Neglect – The persistent failure to meet a child’s basic physical or emotional needs, leading to serious impairment of health or development. This may involve inadequate food, shelter, supervision, or medical care. Signs include malnourishment, poor hygiene, frequent absences, or an inability to manage emotions.**

The concept of Significant Harm, introduced in the Children Act 1989, underpins the legal threshold for compulsory intervention to protect a child.

- **Contextual Safeguarding**  
Children’s vulnerabilities do not exist in isolation. Contextual Safeguarding recognises that risks extend beyond the home or care setting and can be shaped by external factors such as:
- **Peer-on-peer abuse – Harm caused by other young people, including bullying, harassment, violence, and sexual abuse.**
- **County Lines – Criminal networks exploiting children for drug trafficking or other illegal activities.**
- **Online Risks – Exposure to grooming, exploitation, cyberbullying, radicalisation, or harmful content through social media and gaming platforms.**
- **Community and Environmental Factors – Risks linked to unsafe local areas, gang activity, or social influences that may increase a child’s vulnerability.**

Adults working within Cameron and Cooper Limited must stay alert to external influences, ensuring a holistic safeguarding approach that identifies and addresses risks in a child's wider context.

### **Safeguarding Oversight and Responsibility**

The Local Authority Designated Officer (LADO) oversees allegations against professionals working with children. Within Cameron and Cooper Limited, the Head of Safeguarding ensures that all safeguarding and child protection practices align with statutory guidance and best practice, maintaining a culture of safety, trust, and vigilance.



## Responsibilities of Adults at Cameron and Cooper Limited

**Safeguarding is everyone's responsibility. All adults must:**

- Be **vigilant** to signs of abuse or neglect.
- **Respond immediately** to concerns and report them appropriately.
- **Work collaboratively** with external safeguarding agencies.
- **Follow safer caring guidelines** to minimise risk.

### Recognising Signs of Abuse

To ensure all adults can effectively identify abuse, the following table provides key warning signs:

Type of Abuse	Possible Signs
<b>Physical Abuse</b>	Unexplained bruises, burns, fractures, reluctance to be touched, fear of adults.
<b>Emotional Abuse</b>	Low self-esteem, withdrawal, extreme behaviour (aggression or passivity), excessive fear of making mistakes.
<b>Sexual Abuse</b>	Knowledge or behaviour inappropriate for age, secrecy, fear of a particular individual, STIs, discomfort in sitting or walking.
<b>Neglect</b>	Poor hygiene, malnourishment, untreated medical conditions, frequent absence from education, lack of supervision.
<b>Child Criminal Exploitation (CCE)</b>	Unexplained wealth, association with gangs, missing episodes, carrying weapons, fear of law enforcement.
<b>Child Sexual Exploitation (CSE)</b>	Relationships with older individuals, secrecy, signs of coercion, frequent mobile phone use, sudden changes in behaviour.
<b>Radicalisation</b>	Increased isolation, extremist views, hostility towards different groups, secretive online activity.

### Key Principles

#### Person-centred Practice

The welfare of the child is paramount. Children's and young people's voices, wishes, and feelings are actively sought and valued. Every safeguarding decision is made with their best interests at heart, and all interventions prioritise their safety and wellbeing. We believe that children and young people thrive in an environment where they feel safe, valued, and consistently supported by caring and trusted adults.

#### A Culture of Vigilance

All Adults must remain alert to signs of abuse and neglect and act swiftly. When a young person discloses concerns, adults must listen attentively, remain calm, and offer reassurance. It is important to:

- **Believe what is being said and take their concerns seriously.**
- **Explain that the information will be shared with the appropriate people to ensure their safety and protection.**
- **Avoid leading questions or introducing new ideas.**
- **Never promise confidentiality if it cannot be maintained.**

### **Organisational Oversight and Governance**

The Head of Safeguarding has strategic oversight of all safeguarding processes, ensuring alignment with legal and regulatory requirements. The Designated Safeguarding Lead (DSL) is available during office hours and through the on-call system. Any safeguarding concern must be reported immediately to the home manager, deputy manager, or on-call safeguarding lead. If a child is at immediate risk of harm, an urgent referral must be made to the local authority and, if necessary, the police. An email detailing the safeguarding concern must be sent to the relevant safeguarding leads, including the Head of Safeguarding.

### **Record-Keeping and Monitoring**

Accurate and timely records are essential in safeguarding practice. All safeguarding incidents must be documented using Clear Care, our secure recording system. Adults must ensure that all safeguarding concerns are documented with clarity and sensitivity, recognising that these records may be used in multi-agency meetings or legal proceedings. Key record-keeping responsibilities include:

- Informing the Designated Safeguarding Lead (DSL) verbally before transferring information to the safeguarding report.
- Accurately recording any injuries or bruises, using language as expressed by the young person where applicable.
- Ensuring records remain factual and accessible only to authorised personnel.
- Conducting weekly management reviews to identify patterns and ensure appropriate support for young people and required actions are being implemented.
- Logging all safeguarding reports in the organisation's risk register for weekly senior leadership oversight and monitoring.

### **Multi-Agency Collaboration**

At Cameron and Cooper Limited, we recognise that safeguarding is most effective when it is a shared responsibility. We are committed to working proactively and collaboratively with external safeguarding agencies to ensure that concerns are addressed in a coordinated, timely, and effective manner.

Our approach is guided by the Working Together to Safeguard Children (2023) framework, ensuring that information sharing and decision-making are transparent, lawful, and focused on the best interests of the child.

### **Key Multi-Agency Partnerships**

Cameron and Cooper Limited works closely with the following safeguarding agencies:

- **Surrey Early Help Team – Supporting children and families at the earliest opportunity to prevent safeguarding concerns from escalating.**
- **Hampshire Safeguarding Hub – A single point of contact for safeguarding referrals, enabling timely and appropriate action.**
- **Prevent and Counter-Terrorism Partnerships – Working with local Prevent teams to identify and support children vulnerable to radicalisation and extremist influences.**
- **Local Domestic Abuse Services – Ensuring children who have experienced domestic abuse receive specialist support and intervention.**
- **Local Authority Designated Officer (LADO) – Liaising with the Surrey and Hampshire LADOs to address allegations against professionals working with children.**
- **Police and Youth Offending Teams – Ensuring a coordinated response to criminal exploitation (CCE), County Lines activity, and missing episodes.**
- **Health Professionals – Working with CAMHS, GPs, and specialist health practitioners to address the physical and emotional well-being of children.**
- **Education Providers – Partnering with schools, alternative provisions, and virtual schools to ensure educational stability and safeguarding support for children.**

#### **Information Sharing and Compliance**

We follow strict protocols for information sharing, ensuring compliance with:

- **The Data Protection Act 2018 and UK GDPR – Protecting confidentiality while ensuring that safeguarding takes precedence over data protection concerns where a child is at risk.**
- **Working Together to Safeguard Children (2023) – Ensuring that information is shared proactively to facilitate effective multi-agency decision-making.**
- **The Surrey and Hampshire Safeguarding Children Partnership Procedures – Aligning our practices with local safeguarding guidance and information-sharing agreements.**

#### **Key Information Sharing Principles**

- **Timely Sharing – Relevant safeguarding information is shared promptly to prevent delays in protecting children.**
- **Proportionate and Necessary – Information is shared only when required for safeguarding purposes and in a manner that balances risk and confidentiality.**
- **Lawful and Transparent – All information sharing aligns with legal requirements and best practice guidance, ensuring transparency and accountability.**
- **Record-Keeping – Every instance of information sharing is documented in the child’s safeguarding file, including the reason for sharing, agencies involved, and decisions made.**

## **Multi-Agency Meetings and Record-Keeping**

Multi-agency meetings play a critical role in safeguarding children and ensuring a shared, coordinated approach to risk management.

### **Cameron and Cooper Limited ensures that:**

- **All multi-agency meetings are recorded with a clear summary of discussions, actions agreed, and responsible individuals identified.**
- **Decisions from meetings are logged in the child's safeguarding file to ensure transparency and accountability.**
- **Key safeguarding leads attend strategy discussions, core group meetings, child protection conferences, and Early Help assessments to contribute meaningfully to multi-agency planning.**
- **Unresolved concerns are escalated following the Surrey and Hampshire escalation procedures, ensuring swift action when multi-agency responses are inadequate.**

By embedding a strong culture of multi-agency collaboration, structured information sharing, and clear record-keeping, Cameron and Cooper Limited ensures that children receive the protection, intervention, and support they need to thrive.

## **Early Identification and Intervention**

Recognising concerns early and taking appropriate action prevents harm and ensures children receive the support they need. The adults at Cameron and Cooper Limited are expected to remain proactive in identifying risks and addressing them through risk assessments and personalised safeguarding plans. Stability, trust, and ongoing care are at the heart of our interventions, ensuring that young people feel supported through every stage of their journey.

## **Accountability and Continuous Improvement**

Safeguarding is a shared responsibility. All adults at Cameron and Cooper Limited must report concerns immediately, and the organisation is committed to learning from incidents, complaints, and regulatory feedback to enhance safeguarding practices continually. Ongoing training and reflective practice ensure that our team remains well-equipped to uphold the highest standards of safeguarding, ensuring children and young people receive the care, love, and consistency they deserve.

By adhering to this policy, the adults at Cameron and Cooper Limited will ensure the safety and wellbeing of the children and young people in our care, maintaining compliance with legal and regulatory requirements. This policy is subject to regular review to uphold its effectiveness.

## **Safeguarding Culture and Ethos**

At Cameron and Cooper Limited, safeguarding is embedded within our culture, values, and daily practice. Our approach is child-centred, ensuring that children's voices are heard, their rights are upheld, and their experiences shape the way we provide care and protection.

Safeguarding is not just about responding to risks but about creating an environment where children and young people feel safe, valued, and empowered. Love, care, and consistency are at

the heart of our approach, ensuring that every child experiences stability, emotional security, and a sense of belonging.

We are committed to ensuring that safeguarding information and procedures are accessible to all children and young people, ensuring they understand their rights, how to seek help, and what support is available to them.

### **Child-Centred Safeguarding**

- **Empowering Children to Speak Up – Young people in our care are actively encouraged to express their views, raise concerns, and be involved in decisions affecting them. We achieve this through:**
  - **Regular key worker sessions focused on safety, well-being, and emotional expression.**
  - **House meetings where young people can discuss concerns, make suggestions, and contribute to decision-making.**
  - **Direct participation in their care planning and safeguarding discussions, ensuring their views shape their experience in the home.**
  - **Access to independent advocacy services, ensuring young people can raise concerns externally if needed.**
- **Ensuring Safeguarding Information is Accessible to All Young People – To ensure that children understand their rights and how to seek help, Cameron and Cooper Limited provides:**
  - **A child-friendly version of the Safeguarding Policy, explaining their rights in clear, age-appropriate language.**
  - **A Safeguarding Guide, which outlines how to report concerns, what happens after they report, and who can support them.**
  - **Posters and visual guides in communal areas, reminding young people of key safeguarding contacts.**
  - **Details on how to contact external safeguarding bodies (e.g., NSPCC, Childline, Ofsted).**
- **Ensuring Children Feel Safe in the Home Environment – All adults at Cameron and Cooper Limited are trained to:**
  - **Build strong, trusting relationships with young people, ensuring they feel comfortable seeking help.**
  - **Recognise the signs when a child may not feel safe and proactively create opportunities for them to talk.**
  - **Be consistent and predictable, ensuring that young people experience love, care, and stability at all times.**

## Promoting a Safe Environment

At Cameron and Cooper Limited, **safeguarding is not just about responding to risks**, but about **actively creating an environment where children and young people feel safe, secure, and valued**. Our approach is underpinned by **love, care, and consistency**, ensuring that children experience **emotional security, stability, and a strong sense of belonging**.

Through a **proactive safeguarding culture**, we ensure that every child feels **listened to, empowered, and fully supported**, enabling them to thrive in a **safe, stable, and nurturing environment**.

## Behaviour and Safety in the Homes and School

At **Cameron and Cooper Limited**, we are committed to fostering a safe, nurturing, and structured environment where children feel supported, valued, and understood. Our approach to behaviour and safety is built on **positive relationships, proactive strategies, and a culture of consistency and care**.

## Behaviour Management Framework

Our behaviour management approach is guided by the principles set out in our **Promoting Positive Behaviour and Relationships Policy**, ensuring a **consistent and child-centred approach**. Key elements include:

- **Relational Approaches** – Behaviour is understood as a form of communication. Adults at Cameron and Cooper Limited seek to recognise underlying needs, provide emotional support, and respond in a way that builds trust and security.
- **Positive Reinforcement and De-escalation** – We focus on recognising and reinforcing positive behaviours while using de-escalation techniques to manage challenging situations safely and effectively.
- **Team Teach Principles** – Adults are trained in **Team Teach**, ensuring that physical interventions are only ever used as a last resort and in a way that prioritises **respect, dignity, and safety**.
- **Structured Risk Assessments** – Individualised risk assessments are used to **identify triggers, assess potential risks, and inform behaviour support plans** that help keep children and adults safe.

## Behaviour Management and De-Escalation

To ensure young people are supported appropriately, the following de-escalation techniques should be applied before physical intervention is considered:

1. **Stay calm** – Maintain a non-threatening posture and steady tone of voice.
2. **Give space** – Allow the young person physical and emotional space.
3. **Use active listening** – Show empathy and acknowledge feelings.
4. **Offer choices** – Help the young person feel a sense of control.
5. **Redirect focus** – Shift attention to another topic or activity.

6. **Only use physical intervention as a last resort** – Must be proportionate, necessary, and clearly recorded.

### **Use of Physical Intervention**

At Cameron and Cooper Limited, **physical intervention is only ever used as a last resort**, when all other strategies have been exhausted and where there is an **immediate risk of harm** to the child or others. It is never used as a punishment, to enforce compliance, or as a substitute for relationship-based support.

- **Legal Compliance** – All interventions align with relevant **UK legislation and statutory guidance**, ensuring that any use of force is lawful, proportionate, and in the best interests of the child.
- **Reasonable and Necessary** – In line with the **Department for Education's guidance on reasonable force**, any intervention must be **proportionate** to the risk and used only when absolutely necessary to prevent **injury, serious harm, or significant property damage**.
- **Prohibition of Harmful Practices** – Any form of **corporal punishment, degrading treatment, or excessive force** is strictly prohibited. Our approach prioritises the **safety, rights, and well-being of the child** at all times.

### **Training and Continuous Development**

At Cameron and Cooper Limited, we are committed to ensuring that all adults working within our organisation receive high-quality, ongoing safeguarding training to uphold the highest standards of care, safety, and professional practice.

Our training framework is designed to ensure that staff are equipped with the knowledge, skills, and confidence to respond to safeguarding concerns effectively and provide a safe, nurturing environment for children and young people.

### **Safeguarding and Behaviour Management Training**

All adults at Cameron and Cooper Limited receive comprehensive training in safeguarding and positive behaviour management, ensuring they can respond to challenging situations safely and effectively.

- **Mandatory Team Teach Behaviour Management Training** – All adults complete specialist training in **de-escalation techniques, positive behaviour strategies, and the appropriate use of physical intervention**.
- **Ongoing Professional Development** – Regular refresher training and reflective practice sessions ensure that our approach remains consistent, effective, and in line with current best practices.
- **Emotional Regulation and Trauma-Informed Practice** – Training emphasises the importance of emotional regulation, trauma awareness, and relationship-building, ensuring that children receive support that is responsive to their experiences and needs.

## **Strengthening Safeguarding Training Requirements**

To ensure compliance with Surrey and Hampshire safeguarding frameworks and national best practices, we have strengthened our safeguarding training programme with the following:

- **Annual DSL Refresher Training – All Designated Safeguarding Leads (DSLs) are required to complete annual refresher training in line with Surrey and Hampshire safeguarding training frameworks to stay updated on legislative changes, local safeguarding priorities, and best practice developments.**
- **Regular Local Safeguarding Updates – All staff receive ongoing training and briefings on local safeguarding issues, including:**
  - **County lines exploitation and criminal activity trends in Surrey and Hampshire.**
  - **Child Sexual Exploitation (CSE) and grooming risks.**
  - **Changes to local multi-agency safeguarding procedures.**
- **Comprehensive Staff Induction Programme – All new staff members undergo a structured safeguarding induction, which includes:**
  - **An overview of Cameron and Cooper Limited’s safeguarding policies and procedures.**
  - **Information on local safeguarding contacts, including Surrey Early Help, Hampshire Safeguarding Hub, and LADO contacts.**
  - **Training on recognising, reporting, and recording safeguarding concerns.**
- **Tracking and Auditing Training Completion – We actively monitor and record all training to ensure that:**
  - **All staff meet safeguarding competency standards.**
  - **Refresher courses are completed on time.**
  - **Training content remains relevant and responsive to emerging safeguarding risks.**

By embedding ongoing safeguarding training, regular updates on local risks, and rigorous tracking of training completion, Cameron and Cooper Limited ensures that all adults are fully equipped to safeguard children effectively and provide the highest standard of care and protection.

## **Incident Recording, Review, and Learning**

We are committed to **transparency, accountability, and continuous improvement** in all aspects of behaviour management:

- **Incident Recording** – Any situation requiring the use of force is recorded in detail, ensuring a **clear and accurate account** of the event, actions taken, and outcomes.



- **Parental Notification** – In line with best practice and forthcoming statutory requirements, parents or guardians are informed of significant incidents as soon as practicable.
- **Post-Incident Reflection and Support** – A debrief process is conducted with both the child and the adults involved to **review what happened, offer emotional support, and identify any necessary changes to support plans.**

### **Safeguarding and Individualised Support**

Our **Promoting Positive Behaviour and Relationships Policy** provides **full oversight** of our approach to behaviour management, ensuring that every child receives **individualised support tailored to their specific needs, circumstances, and experiences.**

- **Preventative and Early Intervention Strategies** – We focus on **early support, emotional coaching, and proactive interventions** to prevent challenging situations from escalating.
- **Personalised Behaviour Support Plans** – Each child has a **tailored individual positive support behaviour plan** informed by their needs.
- **Commitment to Love, Care, and Consistency** – Everything we do is **rooted in building trusting relationships**, ensuring that children **feel safe, valued, and supported** in their journey toward positive growth and emotional well-being.

By embedding these principles into our daily practice, **Cameron and Cooper Limited** ensures that our homes are safe, structured, and supportive spaces where **children can thrive, develop, and feel genuinely cared for.**

### **Safer Recruitment**

At Cameron and Cooper Limited, we are committed to maintaining a safe and protective environment for children by ensuring that every adult working with us is suitable, competent, and aligned with our values of love, care, and consistency.

### **Recruitment Process**

Our safer recruitment process is rigorous and designed to prevent unsuitable individuals from working with children. It includes:

- **Clear safeguarding statements in job advertisements** – All recruitment materials **explicitly state our commitment to safeguarding and the requirement for appropriate checks.**
- **Standardised application forms** – A structured application process ensures consistency in information collection, helping to identify gaps or concerns in employment history.
- **Comprehensive interviews** – Every applicant undergoes an interview that includes **safeguarding-related questions to assess their understanding of child protection responsibilities.**

- **Thorough reference checks – At least two references are obtained, including one from the most recent employer. References are verified to ensure the individual has no prior safeguarding concerns.**
- **Enhanced Disclosure and Barring Service (DBS) checks – No adult is permitted to work with children until they have undergone an enhanced DBS check, including checks against the children’s barred list.**

### **Post-Recruitment Safeguarding Measures**

Safer recruitment does not end when an individual is hired. Cameron and Cooper Limited continues to promote a culture of safeguarding by ensuring that:

- **All adults complete mandatory safeguarding training before starting their roles, with ongoing refresher training to maintain awareness of evolving risks.**
- **Any concerns regarding an adult’s suitability are immediately investigated and addressed in line with statutory guidance and internal procedures.**
- **The Head of Safeguarding oversees all safer recruitment processes and ensures compliance with Keeping Children Safe in Education (KCSIE 2024) and other relevant safeguarding legislation.**

Through these measures, we create an environment where children’s safety is prioritised at every stage, ensuring that every adult at Cameron and Cooper Limited upholds our commitment to love, care, and consistency.

### **Safeguarding Training**

Safeguarding is a shared responsibility, and all adults must be equipped with the knowledge and confidence to act protectively in any situation. Safeguarding training is embedded into our practice, starting with a thorough induction for new adults, ensuring they understand their roles, responsibilities, and reporting procedures from day one.

Ongoing training is mandatory, with regular refresher courses to keep adults informed about best practices, legislative changes, and emerging safeguarding concerns. Specialist training on trauma-informed care, attachment theory, and contextual safeguarding supports our team in delivering care that is responsive to the needs and experiences of the children we support. Reflective practice and learning from safeguarding incidents also form an important part of our approach, ensuring continuous improvement.

### **Safer Caring Practices**

Children need relationships built on trust, emotional security, and consistency. Our safer caring practices provide clear guidelines to ensure professional boundaries are maintained while fostering warm and meaningful connections with children. The adults are expected to model appropriate behaviour at all times, demonstrating respect, reliability, and an unwavering commitment to each child’s wellbeing.

By embedding a culture of openness and accountability, we ensure that safeguarding is a collective effort. Supervision, team discussions, and safeguarding reviews provide opportunities to reflect on practice and reinforce expectations, creating an environment where children feel protected and valued.

## **Support for Adults**

Adults at Cameron and Cooper Limited are supported through monthly reflective group supervision sessions, with optional individual (1:1) sessions with the group facilitator as needed. Regular formal supervision meetings with line managers are also provided, along with access to the Employee Assistance Programme (EAP) for emotional or counselling support.

## **Risk Assessments**

Risk assessment is an essential safeguarding tool, helping to identify and minimise potential dangers while ensuring that children can engage in everyday experiences safely. We take a dynamic and proactive approach to risk management, assessing risks at an individual, environmental, and organisational level.

Every child has a personalised risk assessment that is regularly reviewed and adapted to reflect their changing needs and circumstances. Environmental risk assessments are carried out routinely to ensure the home remains a safe space, while wider assessments consider external risks, including online safety, community influences, and contextual safeguarding concerns.

Risk management is not about limiting experiences but ensuring that children can explore, learn, and develop within a framework of safety and support. Through thoughtful planning and a shared responsibility for safeguarding, we create an environment where children feel secure and empowered.

## **Supporting Children and Young People**

Safeguarding is not just about protecting children and young people from harm—it is about creating an environment where they feel safe, valued, and empowered. Love, care, and consistency are at the heart of our approach, ensuring that every child experiences stability, emotional security, and a sense of belonging.

Cameron and Cooper Limited is committed to supporting children throughout their journey in our care and ensuring that, as they approach adulthood, they are effectively prepared for their transition into the next stage of their lives.

## **Transition to Adulthood and Leaving Care**

While young people at Cameron and Cooper Limited do not remain in our care beyond their 18th birthday, we are committed to ensuring a well-planned transition that prioritises their emotional well-being, independence, and continued safeguarding. To support this, our young adults' service, Willow Lodge, is available for those transitioning to adulthood and leaving care, providing guidance, stability, and practical support during this critical stage.

### **Key Principles of Transition Support:**

- **Early Transition Planning – Discussions about a young person's future begin well before they turn 18, ensuring stability and preparedness.**
- **Multi-Agency Coordination – We work closely with the young person's local authority, social worker, and pathway planning team to ensure a smooth transition into their next placement, independent living arrangement, or continued care provision.**

- **Emotional and Practical Support – Young people are guided and supported in developing essential life skills, including budgeting, accessing healthcare, education, employment, and emotional resilience.**
- **Advocacy and Rights Awareness – Every young person is supported to understand their rights and entitlements, including post-18 support services, financial provisions, and advocacy support.**
- **Referral to Adult Services (if applicable) – Where a young person has ongoing additional needs, we liaise with the local authority’s Adult Social Care team to ensure appropriate referrals and continuity of care.**
- **Safety and Well-Being Monitoring – We maintain appropriate levels of communication with external agencies to ensure that young people leaving our care continue to be safeguarded and supported.**

Our role does not end abruptly at 18—instead, we ensure that young people are empowered, prepared, and supported in their journey into adulthood.

By embedding structured transition planning, strong external partnerships, and emotional and practical preparation, Cameron and Cooper Limited ensures that every young person leaves our care with confidence, resilience, and a foundation for a successful future.

### **Building Trust and Consistency**

Children thrive in relationships where they feel understood, respected, and supported. The adults at Cameron and Cooper Limited prioritise building trusting relationships through consistency in care, clear communication, and genuine emotional availability. Predictability and reliability in daily routines help children feel secure, particularly those who have experienced instability in the past.

We recognise that trust is earned over time and that every child’s journey is different. The adults at Cameron and Cooper Limited take the time to get to know each young person, understanding their individual needs, fears, and aspirations. By being present, listening attentively, and following through on commitments, we create a culture where children know they can rely on the adults around them.

### **Promoting Emotional Well-being**

Emotional well-being is central to a child’s overall development and safety. We take a trauma-informed approach, recognising the impact of adverse experiences and responding with sensitivity, patience, and understanding. The adults at Cameron and Cooper Limited are trained to recognise signs of distress, offer appropriate reassurance, and support children in developing healthy coping strategies.

Our environment is designed to be a safe space where children can express their feelings without fear of judgement. Therapeutic approaches, keyworker relationships, and access to emotional support services ensure that children receive the help they need. We promote self-care, positive identity, and resilience, helping children develop the confidence to navigate challenges and build healthy relationships.

### **Encouraging Participation**

Children and young people have the right to be heard and involved in decisions that affect them. We actively encourage young people to share their views, whether in day-to-day conversations, keywork sessions, or more formal settings like care planning meetings.

By creating a culture where children and young people feel their opinions matter, we strive to empower them to take ownership of their lives and develop a sense of agency. The adults at Cameron and Cooper Limited are committed to ensuring that every child understands their rights and feels comfortable voicing concerns, preferences, and aspirations. Their input is valued in shaping the care and safeguarding practices within the organisation and respective homes.

### **Advocacy and Independent Support**

At Cameron and Cooper Limited we recognise the importance of independent advocacy in ensuring that children's voices are heard and their rights upheld. Every young person has access to an independent advocate who can provide support, guidance, and representation if needed.

Our role is not just to care for children but to empower them. Whether through advocacy services, independent visitors, or informal champions within the home, we ensure that children and young people know they are not alone in their journey. Adults actively encourage children and young people to seek support and help them understand how to access independent services.

By embedding trust, emotional support, and advocacy into our safeguarding approach, we create an environment where children and young people feel safe, valued, and listened to—ensuring they have the foundation they need to grow and thrive.

### **Working with Families and External Agencies**

Safeguarding is most effective when it is a shared responsibility. At Cameron and Cooper Limited we recognise the importance of working collaboratively with families and external agencies to ensure the best outcomes for children and young people. Through open communication, professional partnerships, and clear procedures, we create a safeguarding framework that is responsive, accountable, and centred on the needs of young people.

### **Engaging Families**

Where appropriate and in the best interests of the child, we work closely with families to promote their involvement in safeguarding and care planning. We recognise that maintaining positive relationships with family members can provide children with a sense of identity, continuity, and emotional support.

The adults at Cameron and Cooper Limited approach family engagement with sensitivity, ensuring that communication is clear, transparent, and respectful. Families are kept informed about key aspects of their child's well-being, where it is safe and appropriate to do so, and are encouraged to participate in meetings, decision-making, and support plans. Our approach is always person-centred—prioritising the child's voice, feelings, and best interests while balancing the complexities of family relationships.

### **Multi-Agency Working**

Safeguarding requires effective collaboration between multiple agencies, including social care, education, health services, and the police. We actively engage with external professionals,

ensuring that information is shared appropriately and that safeguarding concerns are addressed in a coordinated manner.

The adults at Cameron and Cooper Limited follow established procedures for making referrals, attending strategy meetings, and contributing to child protection plans. Information sharing is conducted in line with the **Data Protection Act 2018** and **Working Together to Safeguard Children (2023)**, ensuring that concerns are raised and addressed in a timely and lawful manner.

Regular communication with external partners ensures that each young person receives the right support at the right time. We work proactively with external safeguarding leads, ensuring that any interventions are in the best interests of the child.

### **Escalation Process**

While we aim to resolve safeguarding concerns through professional dialogue and cooperation, there may be instances where appropriate action is not taken, or safeguarding concerns are not adequately addressed. In such cases, Cameron and Cooper Limited follows a structured escalation process to ensure that risks to children are never ignored and that concerns are addressed in a timely and effective manner.

If a concern is not acted upon by an external agency or professional, the Head of Safeguarding and Designated Safeguarding Lead (DSL) must escalate the matter using the following process:

#### **1. Internal Escalation**

- **Staff must first raise the concern with the DSL and/or the Head of Safeguarding, who will assess the issue and determine the next steps.**

#### **2. Formal External Escalation**

- **If concerns remain unresolved, the Head of Safeguarding or DSL must escalate the issue to the relevant Children's Services Team or Local Authority Designated Officer (LADO).**
- **Escalation should include a clear written record detailing previous concern, actions taken, and responses received.**

#### **3. Multi-Agency Resolution and Dispute Process**

- **If safeguarding concerns are still not adequately addressed, Cameron and Cooper Limited will follow the relevant local safeguarding escalation procedures:**
  - **Surrey: Use the "*Finding Solutions Together*" (FST) Process to challenge decisions made by external agencies.**
  - **Hampshire: Use the *Professional Differences Resolution Process* to formally raise concerns regarding delays or inadequate responses.**

#### **4. Referral to Ofsted**

- **If all escalation routes have been exhausted and there is a continued failure to protect a child, the matter must be referred to Ofsted without delay.**

- **The Head of Safeguarding or Registered Manager will make this referral, ensuring that Ofsted is provided with a clear timeline of concerns and actions taken.**

All escalation steps must be recorded, ensuring a clear audit trail of concerns raised, actions taken, and responses received. The adults at Cameron and Cooper Limited are encouraged to be professionally curious and persistent in advocating for children, ensuring that safeguarding remains proactive rather than reactive.

By maintaining strong partnerships, clear procedures, and unwavering commitment to safeguarding, we ensure that every child receives the protection and support they need to thrive.

### **Responding to Allegations or Concerns Regarding Adults at Cameron and Cooper Limited**

At **Cameron and Cooper Limited**, we are committed to maintaining a culture of safety, transparency, and accountability. Any allegation or concern regarding an adult's conduct towards a child must be taken seriously, responded to promptly, and managed in line with statutory safeguarding procedures.

This procedure applies when an allegation or concern arises that an adult at Cameron and Cooper Limited has:

- **Engaged in behaviour that has caused harm or poses a risk of harm to a child.**
- **Possibly committed a criminal offence against or related to a child.**
- **Demonstrated conduct towards children that raises concerns about their suitability to work in a child-centred environment.**
- **Engaged in behaviours outside of work that may indicate they are unsuitable to work with children.**

All concerns should be assessed in the context of the four types of abuse: **physical, sexual, emotional, and neglect**. Where necessary, a **risk assessment** must be conducted to determine the potential impact on children within our care.

### **Examples of Behaviour That May Constitute Harm**

Any behaviour that could place a child at risk of harm must be reported. The following are examples of behaviours that constitute safeguarding concerns:

- Engaging in a sexual relationship with a child under the age of 18 while in a position of trust (Sexual Offences Act 2003, Sections 16-19).
- 'Grooming' behaviours, including meeting a child under 16 with intent to commit an offence (Sexual Offences Act 2003, Section 15).
- Inappropriate communication with a child, such as suggestive or personal messages via text, email, or social media.
- Possession, distribution, or production of indecent images of children.



## **Reporting and Managing Allegations**

All allegations or concerns must be reported immediately to the **Head of Safeguarding or Designated Safeguarding Lead (DSL)**, who will assess the situation and take appropriate action. This may include:

- **Referral to the Local Authority Designated Officer (LADO)** to ensure a fair, independent assessment.
- **Informing Ofsted, the police, or other regulatory bodies** where necessary.
- **Implementing precautionary measures**, such as suspension, where there is an ongoing risk to children.

**No concern should be dismissed, and all allegations will be handled in a fair, confidential, and transparent manner, prioritising the safety and well-being of children at all times.**

## **Managing Low-Level Concerns and Whistleblowing**

At Cameron and Cooper Limited, we are committed to fostering a culture of openness, transparency, and accountability to ensure the safety and well-being of the children in our care. A vital part of this is having clear procedures for raising and managing low-level concerns, as well as a robust whistleblowing framework that empowers adults to report serious safeguarding issues.

This section outlines how low-level concerns should be managed and provides clear guidance on whistleblowing procedures, ensuring that concerns of all levels are appropriately addressed to uphold the highest safeguarding standards.

### **Low-Level Concerns**

A low-level concern is any behaviour by an adult that does not meet the threshold for serious misconduct but is inconsistent with expected professional standards and safeguarding principles. Addressing these concerns early prevents potential escalation and ensures the integrity of the care environment.

### **Recognising Low-Level Concerns**

**Low-level concerns may include, but are not limited to:**

- **Being overly friendly with a child in a way that creates blurred professional boundaries.**
- **Favouritism or giving a child special treatment that could be misinterpreted.**
- **Using inappropriate language, jokes, or comments around children.**
- **Engaging in unnecessary physical contact or interactions that lack a clear professional intent.**
- **Failing to maintain professional boundaries, either in person or online.**

These behaviours may not constitute abuse or serious misconduct but addressing them early and transparently is key to maintaining a strong safeguarding culture.

### **Reporting Low-Level Concerns**



- **Creating an Open Culture – All adults at Cameron and Cooper Limited are encouraged to report any concern, no matter how small, as part of our proactive safeguarding approach.**
- **Reporting Process – Concerns should be raised promptly with the Head of Safeguarding, DSL, or a senior manager, who will assess the situation and determine next steps.**
- **Use of Surrey’s “Traffic Light Tool” – To categorise concerns appropriately and determine whether escalation is required, all low-level concerns will be assessed using Surrey’s “Traffic Light Tool”, which provides clear thresholds for intervention.**
- **Self-Reporting – Adults at Cameron and Cooper Limited are encouraged to self-report if they recognise that their own actions may have been misinterpreted, or if they believe they have made a professional misjudgement.**

### **Managing Low-Level Concerns**

- **Assessment and Review – Each concern is reviewed on a case-by-case basis, considering the context and impact while maintaining fairness to the individual involved.**
- **Secure Tracking Log – A secure log will be maintained to track all low-level concerns, allowing patterns of behaviour to be identified and ensuring concerns do not go unnoticed.**
- **Proportionate Response – If necessary, adults may receive additional training, mentoring, or guidance to ensure professional boundaries are maintained. Where concerns indicate a pattern of inappropriate behaviour, further action may be taken, including formal disciplinary procedures.**

By effectively managing low-level concerns, Cameron and Cooper Limited ensures that all adults maintain the highest safeguarding standards while fostering a learning and reflective environment where concerns can be raised without fear of undue consequences.

### **Whistleblowing (Sounding the Alarm)**

Whistleblowing is the reporting of serious concerns about malpractice, wrongdoing, or safeguarding failures that could put a child at risk. It plays a crucial role in protecting children and maintaining the integrity of our service.

### **When to Raise a Whistleblowing Concern**

Whistleblowing applies when a concern involves:

- **A serious breach of safeguarding policy, including neglect, abuse, or misconduct by a colleague.**
- **A failure to act on known safeguarding concerns, placing a child at continued risk.**
- **Unsafe practices, serious health and safety risks, or non-compliance with statutory safeguarding requirements.**
- **Attempts to conceal wrongdoing or discourage reporting of concerns.**

While low-level concerns are usually handled internally, whistleblowing is necessary when issues are more serious or systemic, particularly if concerns are being ignored or mishandled by those in positions of responsibility.

### **Reporting Whistleblowing Concerns**

- **Internal Reporting – Adults at Cameron and Cooper Limited should report concerns in the first instance to their line manager, Head of Safeguarding, DSL, or senior leadership team.**
- **Alternative Reporting Routes – If concerns cannot be addressed internally, or if the whistleblower fears repercussions, they may escalate concerns externally to the:**
  - **Local Authority Designated Officer (LADO)**
  - **Ofsted**
  - **NSPCC Whistleblowing Helpline**

### **Protection for Whistleblowers**

- **Legal Protection – Employees who raise safeguarding concerns in good faith are protected under UK whistleblowing laws, meaning they cannot be dismissed, penalised, or victimised for reporting concerns.**
- **Confidentiality – Reports will be handled confidentially, with information shared only on a need-to-know basis to ensure appropriate investigation.**
- **Protection for Reporting Low-Level Concerns – Whistleblowing protections extend to staff who report low-level concerns, ensuring they are protected from retaliation if they raise concerns about inappropriate behaviour by colleagues.**
- **No Tolerance for Retaliation – Cameron and Cooper Limited does not tolerate any form of retaliation against individuals who raise legitimate concerns. Any form of intimidation, harassment, or unfair treatment of whistleblowers will be taken seriously and investigated accordingly.**

### **Response to Whistleblowing Reports**

- **Immediate Action – Any reported concern will be investigated thoroughly and objectively by the appropriate safeguarding lead or an external authority if required.**
- **Outcome and Learning – Findings from whistleblowing reports contribute to service improvements and safeguarding enhancements, ensuring that all concerns lead to positive changes where necessary.**
- **Support for Whistleblowers – Whistleblowers will receive ongoing support, including assurance that their concerns are being taken seriously and guidance on any necessary follow-up steps.**

### **Embedding a Culture of Transparency and Accountability**

**Cameron and Cooper Limited is committed to creating an environment where:**

- **Every concern is taken seriously, investigated properly, and acted upon responsibly.**

- **Children’s safety and well-being remain the highest priority in all decision-making.**
- **All adults feel safe and empowered to raise concerns without fear of negative consequences.**

Through openness, integrity, and accountability, we ensure that Cameron and Cooper Limited remains a safe and supportive environment where safeguarding standards remain exceptionally high.

### **Photography, Videography, and CCTV: Privacy & Data Protection**

At Cameron and Cooper Limited, we recognise that photography and videography can be powerful tools for capturing meaningful moments, promoting self-esteem, and documenting achievements. However, we are equally committed to safeguarding privacy and ensuring compliance with legal and ethical guidelines to prevent misuse or misinterpretation.

Additionally, CCTV is used for external security purposes at residential homes and within classrooms at our educational provisions. This ensures the safety of young people, adults, and the wider community, while also respecting their privacy and dignity.

Our approach aligns with UK data protection laws, safeguarding policies, and best practices, ensuring that young people’s rights are respected while allowing them to safely celebrate their experiences.

### **Purpose and Safeguarding Considerations**

While photography and videography can enhance a child’s sense of belonging and identity, they also pose potential safeguarding risks if not managed appropriately. We ensure that:

- **The dignity, privacy, and protection of young people are prioritised.**
- **Images and videos are only taken and used with a clear, legitimate purpose and consent.**
- **Strict controls are in place to prevent misuse, unauthorised sharing, or inappropriate storage.**
- **CCTV use is limited to external areas of the homes and classrooms within educational provisions.**

These measures align with data protection regulations and safeguarding best practices, ensuring the safe and appropriate use of photography, videography, and CCTV.

### **Consent and Authorisation**

To safeguard young people, strict consent and approval measures must be followed before capturing or storing any images or video footage:

- **Managerial Approval – Any photography or video recording must be authorised in advance by a line manager and conducted in line with safeguarding policies.**
- **Informed Consent – Young people must have a clear understanding of why their image is being taken and provide their informed consent.**
  - **If a child is under 13, consent must be obtained from their parent/guardian/Social worker.**

- **For young people aged 13 and above, their own consent is typically required, unless safeguarding concerns or legal restrictions apply.**
- **Alternative Consent – If a child is unable to provide informed consent, written permission must be obtained from a legally designated authority.**
- **Use of External Photographers – If external photographers or videographers are engaged for events, they must:**
  - **Be fully briefed on safeguarding expectations.**
  - **Be clearly identified and never left unsupervised with young people.**
  - **Follow strict image storage and sharing protocols.**

These measures reflect UK GDPR requirements and ensure that young people and their families retain control over how images and recordings are used.

### **Storage, Security, and Use of Equipment**

To prevent unauthorised access or misuse, all photography and video equipment must be managed securely:

- **Centralised Storage – Digital and video cameras, as well as memory cards, must be stored in a secure, designated location when not in use.**
- **Prohibition on Personal Devices – Adults at Cameron and Cooper Limited must not use personal devices (including mobile phones) to take, store, or share images of children.**
  - **Any exceptions must be authorised in writing by a line manager and agreed upon with the Designated Safeguarding Lead (DSL).**
- **Restricted Use of Mobile Phones – Adults at Cameron and Cooper Limited are strictly prohibited from using personal phones to capture safeguarding or incident evidence. Instead, organisational recording procedures must be followed.**

These precautions align with UK GDPR and safeguarding best practice, ensuring safe and appropriate use of images while preventing potential data breaches or unauthorised sharing.

### **Use of CCTV in External Areas and Schools**

Cameron and Cooper Limited only uses CCTV in external areas of the homes and in school classrooms, ensuring compliance with ICO guidelines, UK GDPR regulations, and safeguarding best practices.

- **External CCTV for Security –**
  - **CCTV is installed only in external areas of the homes to support site security and safeguarding.**
  - **It does not operate inside residential homes, private areas, or communal living spaces.**
- **CCTV in School Classrooms –**

- **CCTV is used in school classrooms to support learning environments, safeguarding measures, and behaviour management.**
- **It is not used for continuous monitoring of children or staff but may be reviewed in response to specific safeguarding concerns or incidents.**
- **Retention and Access –**
  - **CCTV footage is stored securely and retained for a maximum of 30 days, unless required for an investigation or legal purpose.**
  - **Access to recorded footage is strictly limited to senior safeguarding staff and authorised personnel and can only be reviewed for legitimate safeguarding or security concerns.**

By ensuring clear privacy guidelines, Cameron and Cooper Limited upholds young people's rights while maintaining a safe and secure environment.

### **Preventing Misinterpretation and Misuse**

All adults at Cameron and Cooper Limited have a responsibility to ensure that their actions around photography, videography, and CCTV are not misconstrued. To uphold safeguarding principles:

- **Professional Conduct – Adults must always ensure that images and recordings are taken in appropriate contexts, avoiding any situations that could lead to misinterpretation.**
- **Appropriate Settings – Images and recordings must only be taken in designated areas and must never be captured in private spaces such as bedrooms or bathrooms.**
- **Sensitive Sharing and Distribution – Images and recordings must never be shared externally, posted online, or distributed without explicit consent and must always align with organisational and legal guidelines.**
- **Transparency and Accountability – Staff must be clear and open about the intended use of any images or videos taken.**

By following these principles, we reduce risks associated with the misuse of images and maintain a culture of professionalism, safety, and respect.

### **Ongoing Review and Compliance**

As technology and safeguarding challenges evolve, Cameron and Cooper Limited is committed to:

- **Monitoring changes in legislation, including GDPR and child protection laws, to ensure compliance.**
- **Regularly reviewing policies to reflect advances in technology and emerging safeguarding risks.**
- **Providing training to ensure that all adults at Cameron and Cooper Limited remain confident in applying best practices in photography, videography, and CCTV use.**

By following these safeguarding measures, Cameron and Cooper Limited ensures that photography, videography, and CCTV are used responsibly, ethically, and in a way that enhances young people's experiences while prioritising their safety, rights, and privacy.

### **Monitoring, Evaluation, and Review**

At **Cameron and Cooper Limited**, we maintain a **robust safeguarding monitoring framework**, ensuring that all **live safeguarding concerns** are **regularly reviewed, updated, and escalated where necessary**. Safeguarding is a **dynamic and evolving process**, requiring **continuous oversight, risk assessment, and collaboration** between safeguarding leads.

### **Weekly Risk Register Meeting**

To ensure a **proactive and coordinated approach to safeguarding**, a **weekly risk register meeting** is held between the **Head of Safeguarding and all Designated Safeguarding Leads (DSLs)**. The purpose of this meeting is to:

- **Review all open/live safeguarding concerns** – Ensuring that cases are progressing appropriately, that risk levels are accurately assessed, and that responses remain proportionate and effective.
- **Ensure timely updates and escalation** – Reviewing whether any safeguarding cases require **escalation to external agencies** (such as social care, LADO, or the police) and ensuring that outstanding actions are followed up.
- **Monitor multi-agency involvement** – Tracking **ongoing referrals and interventions** from external safeguarding partners and ensuring that **Cameron and Cooper Limited remains proactive** in advocating for the young person's needs.
- **Identify emerging patterns and risks** – Recognising **themes, repeated concerns, or service-wide safeguarding trends** that may require a **wider organisational response** or policy update.
- **Address barriers and delays** – Identifying any cases where **responses from external agencies have been slow, ineffective, or inadequate**, and agreeing on escalation strategies.

All discussions and decisions from the **weekly risk register meeting** are **formally recorded**, ensuring **accountability, transparency, and a clear audit trail** for all safeguarding actions taken.

### **Case Review and Risk Management**

In addition to the **weekly risk register meeting**, safeguarding cases are actively **monitored and reviewed** by the DSLs through:

- **Case-Specific Reviews** – DSLs regularly **assess risk, track safeguarding interventions, and ensure that actions are being followed through**. Any **emerging risks or deteriorating situations** are prioritised for immediate discussion at the risk register meeting.
- **Escalation Where Required** – If concerns remain unresolved or require further intervention, DSLs will escalate cases to:

- The **Head of Safeguarding** for additional oversight and strategic guidance.
- **External safeguarding bodies** (e.g., social care, LADO, police) if the risk level increases.
- **The Responsible Individual (RI) or senior leadership** where there are systemic safeguarding concerns requiring executive action.
- **Multi-Agency Liaison** – Ensuring that Cameron and Cooper Limited remains an **active partner in safeguarding discussions**, advocating for young people’s best interests and ensuring that external agencies **fulfil their statutory responsibilities**.

This structured **risk management approach** ensures that no safeguarding concerns **drift, remain unresolved, or become lost in operational pressures**.

### **Governance, Oversight, and Ongoing Safeguarding Monitoring**

Cameron and Cooper Limited is committed to maintaining the highest safeguarding standards through ongoing monitoring, quality assurance, and leadership oversight. Our governance framework ensures that safeguarding remains proactive, responsive, and continuously evolving in line with regulatory requirements and best practices.

We implement a structured approach to safeguarding governance, ensuring that regular audits, compliance checks, and senior leadership oversight drive continuous improvement.

### **Safeguarding Audits and Compliance Monitoring**

To ensure ongoing safeguarding effectiveness, Cameron and Cooper Limited conducts regular safeguarding audits at multiple levels:

- **Monthly Internal Safeguarding Reviews –**
  - **Each month, a comprehensive safeguarding review is conducted to assess policy compliance, incident reporting trends, and operational safeguarding standards.**
  - **Findings are discussed in monthly leadership meetings, with actions assigned to improve safeguarding responses.**
- **Quarterly Safeguarding Audits –**
  - **Every three months, a formal safeguarding audit is conducted, focusing on:**
    - **Incident trends and patterns (e.g., missing episodes, behaviour management interventions).**
    - **Effectiveness of safeguarding training and knowledge retention.**
    - **Quality of record-keeping in safeguarding logs and care plans.**
    - **Compliance with local and national safeguarding frameworks.**
  - **Reports from these audits are reviewed by the Head of Safeguarding and inform policy updates, staff training priorities, and operational improvements.**
- **Annual Safeguarding Self-Assessment –**

- **Cameron and Cooper Limited conducts an annual safeguarding self-assessment, benchmarking our practices against:**
  - **Children’s Homes (England) Regulations 2015.**
  - **Ofsted’s Social Care Common Inspection Framework (SCCIF).**
  - **Surrey and Hampshire Safeguarding Children Partnership Procedures.**
  - **Working Together to Safeguard Children (2023).**
- **The self-assessment results are used to identify strengths, highlight gaps, and develop an action plan for the following year.**

### **Leadership Accountability and Oversight**

The Head of Safeguarding/Responsible Individual, and Senior Leadership Team provide strategic oversight of safeguarding at Cameron and Cooper Limited. Their responsibilities include:

- **Ensuring clear governance structures for safeguarding, with defined roles and responsibilities at all levels.**
- **Reviewing safeguarding data and trends to proactively identify areas for improvement.**
- **Holding monthly safeguarding meetings, ensuring that all serious incidents, allegations, and risk concerns are reviewed.**
- **Ensuring Regulation 44 and 45 reports are completed, reviewed, and actioned in line with Ofsted requirements.**
- **Providing assurance to external agencies (e.g., local authorities, LADO, Ofsted) that safeguarding concerns are identified, escalated, and managed appropriately.**

### **Safeguarding Data, Record-Keeping, and Quality Assurance**

Cameron and Cooper Limited recognises that effective safeguarding depends on clear record-keeping, accurate data analysis, and rigorous quality assurance. To ensure transparency and accountability, we implement the following measures:

- **Tracking Safeguarding Concerns and Escalations –**
  - **A secure centralised system is used to record all safeguarding concerns, actions taken, and resolutions.**
  - **Trends are regularly analysed to identify patterns of risk, concerns regarding specific individuals, or training needs.**
- **Audit of Safeguarding Files –**
  - **The Head of Safeguarding conducts regular audits of safeguarding records to ensure that:**
    - **Concerns are accurately recorded and chronologically documented.**



- Follow-up actions are logged and completed.
- External agency referrals are tracked for accountability.
- **Quality Assurance of Multi-Agency Working –**
  - Cameron and Cooper Limited regularly reviews its engagement with external agencies to ensure that:
    - All multi-agency meetings are documented, with clear actions assigned.
    - Decisions from safeguarding meetings are effectively implemented.
    - Escalation procedures are followed when external agencies fail to act on safeguarding concerns.

### **Continuous Improvement in Safeguarding**

Safeguarding is a constantly evolving practice, requiring continuous reflection, learning, and adaptation. To maintain excellence in safeguarding, Cameron and Cooper Limited is committed to:

- **Embedding a learning culture, where staff are encouraged to reflect on safeguarding practices, share concerns, and suggest improvements.**
- **Updating safeguarding policies and procedures annually, ensuring that best practice developments, legislative changes, and lessons from audits are fully incorporated.**
- **Ensuring all safeguarding training is reviewed annually, with staff receiving regular updates on key safeguarding trends affecting Surrey and Hampshire.**
- **Seeking external safeguarding expertise, where necessary, to independently review policies and provide objective assessments of safeguarding effectiveness.**

By embedding robust safeguarding governance, clear accountability structures, and a culture of continuous improvement, Cameron and Cooper Limited ensures that safeguarding remains proactive, rigorous, and central to our ethos of love, care, and consistency.

### **Key safeguarding contact information**

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<b>NSPCC</b>	-	<b>0808 800 5000</b>	<a href="mailto:help@NSPCC.org.uk">help@NSPCC.org.uk</a>
<b>Whistleblowing Helpline</b>	-	<b>0800 028 0285</b>	<a href="mailto:help@NSPCC.org.uk">help@NSPCC.org.uk</a>

### Glossary of Terms

<b>Term</b>	<b>Definition</b>
Safeguarding	The proactive measures taken to promote children's welfare and protect them from harm.
Child Protection	A specific aspect of safeguarding, focusing on responding to concerns where a child is at risk of significant harm.
Significant Harm	The threshold defined in the Children Act 1989 that justifies compulsory intervention to protect a child.
Designated Safeguarding Lead (DSL)	The person responsible for overseeing safeguarding within the organisation.
Local Authority Designated Officer (LADO)	The officer responsible for managing allegations against professionals working with children.
Contextual Safeguarding	An approach that considers risks outside the home, such as peer-on-peer abuse, county lines, and online risks.
Whistleblowing	The act of reporting serious concerns about malpractice, wrongdoing, or safeguarding failures.
Team Teach	A training program that teaches de-escalation techniques and the appropriate use of physical intervention.

## Summary of Different Types of Safeguarding Concerns

This section provides a clear and concise breakdown of key safeguarding concerns that all adults at Cameron and Cooper Limited should be aware of and prepared to respond to appropriately.

<b>Peer-on-Peer Abuse</b>
Abuse that occurs between children and young people. Can include bullying, sexual harassment, assault, physical violence, and coercive behaviour.
<b>Upskirting</b>
A criminal offence in the UK involving taking photos or videos under someone's clothing without their consent, typically for sexual gratification or humiliation.
<b>Child Criminal Exploitation (CCE)</b>
When young people are manipulated, coerced, or forced to commit crimes, including drug trafficking (county lines), theft, or violence.
<b>Child Sexual Exploitation (CSE)</b>
A form of abuse where young people are manipulated or forced into sexual activities in exchange for gifts, money, status, or coercion. Often involves online grooming, exploitation by adults or peers, and may be linked to gang involvement.
<b>Online Safety and Exploitation</b>
Risks include grooming, cyberbullying, radicalisation, sharing of indecent images, and exposure to harmful content. Adults must monitor and educate young people on safe internet use.
<b>Neglect</b>
Persistent failure to meet a young person's basic physical or emotional needs, leading to significant harm or developmental issues. Includes inadequate supervision, lack of medical care, or emotional neglect.
<b>Physical Abuse</b>
Intentional physical harm, including hitting, shaking, burning, poisoning, or inflicting pain.
<b>Emotional Abuse</b>
Consistent emotional maltreatment that negatively impacts a young person's mental well-being and development. Includes verbal abuse, threats, humiliation, rejection, and manipulation.
<b>Sexual Abuse</b>
Forcing or enticing a child into sexual activities, including physical contact or exposure to inappropriate content. Includes both contact and non-contact abuse (such as grooming and sharing of explicit material).
<b>Radicalisation and Extremism</b>
Process by which individuals are drawn into supporting terrorist ideologies. Adults should be alert to signs of radicalisation and report concerns under the Prevent Duty.
<b>Domestic Abuse and its Impact on Children</b>
Exposure to domestic violence (physical, emotional, or sexual) can have severe psychological effects on young people. Includes coercive control and witnessing parental conflict.
<b>Self-Harm and Suicidal Ideation</b>
Signs of self-inflicted injuries or expression of suicidal thoughts. Requires immediate safeguarding intervention and support from mental health services.
<b>Honour-Based Violence (HBV), Forced Marriage, and Female Genital Mutilation (FGM)</b>

HBV includes cultural justifications for abuse or harm. FGM is an illegal practice causing severe harm to young girls and must be reported immediately.

**Homelessness and Young People in Unsafe Living Conditions**

Includes risk of exploitation, county lines involvement, and exposure to unsafe environments.