

Safeguarding Children and Adults at Risk Policy

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1. Introduction

Safeguarding is everyone's responsibility. LTS Group acknowledges the duty to safeguard and promote the welfare of children and adults at risk; and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All children and adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

This policy applies to all internal staff and candidates and will be widely promoted and be mandatory for everyone involved in LTS Group. Failure to comply with this policy and the company's safeguarding procedures may result in disciplinary action being taken, including termination of employment and/or contract.

All candidates placed by LTS Group are expected to familiarise themselves with arrangements for safeguarding children and adults at risk in the organisation where they are placed and to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

Here at LTS Group we expect all staff, and candidates to follow and promote good practice in safeguarding. In order to do so, they should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries and safe working practices.
- Report any concerns or disclosures related to the protection and safety of children and adults at risk.
- Undertake mandatory safeguarding and child protection training and awareness sessions where provided.
- Help educate learners/service users in placements regarding matters of keeping safe, including acting as a good role model.

This policy should be read in conjunction with our other relevant safeguarding policies, such as:

- Health and Safety Policy
- Allegations Policy
- Complaints Policy
- Code of Conduct
- Safer Recruitment
- Whistleblowing policy

2. Definitions

Child: According to the Children Act 1989, a 'child' is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under current legislation.

In this policy, the terms 'child' and 'young person', or 'children' and 'young people', are used interchangeably to refer to any individual under the age of 18.

Adult at risk: The Care Act 2014 defines an 'adult at risk' as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/adult at risk by inflicting harm, or by failing to act to prevent harm.

Harm: Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

The Children Act 1989 defines 'harm' as "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another"

Abuse may be perpetrated by an individual from the child's school, community, family, those in a position of trust or another child.

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). This is most likely to include but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, up-skirting, the making or sharing of nudes or semi-nudes (including AI-generated or digitally altered images); and initiation/hazing type violence and rituals.

Categories of Abuse – Children

Child abuse can be one of the following categories as set out in Working Together to Safeguard Children (2026):

Abuse: Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Domestic Abuse: The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse (section 1 of the Act). The statutory definition is clear that domestic abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse.

Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the Domestic Abuse Act 2021). The definition ensures that different types of relationships are captured, including ex-partners and family members.

All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. Section 3 of the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18), as victims in their own right, if they see, hear or experience the effects of abuse.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

The 'Domestic Abuse Act 2021: statutory guidance' provides further advice for frontline professionals who have responsibility for safeguarding and supporting victims of domestic abuse, including children. This guidance provides further information about the different forms of domestic abuse (including teenage relationship abuse and child to parent abuse) and the impact of domestic abuse on children.

Physical Abuse: Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse: The persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are

worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers);
- ensure access to appropriate medical care or treatment; or
- provide suitable education.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For detailed guidance on the signs which may indicate abuse and neglect see What to do if you're worried a child is being abused (2015).

Inclusive and non-stigmatising language: All staff, tutors and mentors must use language that is respectful, inclusive and non-stigmatising when communicating with or about children, young people and their families. This includes avoiding labels or assumptions, using person-centred language, and recognising each individual's strengths, needs and identity. Language should promote dignity, equality and a sense of belonging at all times.

Prejudice-based harm and discrimination: Staff, tutors and mentors must be alert to racism, faith-based prejudice and other forms of discrimination. Such experiences can affect a child's welfare, wellbeing, mental health and willingness to seek help and must be considered within safeguarding practice where appropriate.

Online and technology-facilitated harm: Safeguarding risks may occur online, offline, or both at the same time. Staff must remain alert to grooming, exploitation, cyberbullying, harmful sexual behaviour, the sharing of nudes or semi-nudes, and content that has been digitally altered or generated using artificial intelligence.

Children may experience multiple and overlapping harms, including child criminal exploitation, child sexual exploitation, modern slavery, financial exploitation, serious violence, county lines, radicalisation and abuse outside the family home.

Categories of Abuse – Adults at Risk

The categories of adult abuse are set out in the Care Act 2014 and are as follows:

Physical Abuse: including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.

Domestic Abuse and coercive control: including psychological, physical, sexual, financial, emotional abuse. It also includes so called "honour" based violence. It can occur between any family members.

Sexual Abuse: including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Psychological Abuse: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or Material Abuse: including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern Slavery: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory Abuse: discrimination is an abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act 2010.

Organisational Abuse: including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and Acts of Omission: including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Emotional or Psychological Abuse: including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Further information can be found at <https://www.gov.uk/government/publications/adult-safeguarding-statement-of-government-policy>

3. Our Commitment to Safeguarding

This policy is designed to meet the above principles by ensuring that:

- LTS Group has robust safer recruitment processes that ensures that those who are known to be a risk to children or adults do not gain access to them; those whose actions suggest that they are a risk to children/adults are detected at the earliest stage and prevented from continuing to work with children/adults; and that those who intend to do harm are prevented at every possible stage from entering the workforce.
- Staff and candidates understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and adults at risk.
- There is an open and transparent culture which enables staff and candidates to raise concerns around children/adults at risk, those that work with children/adults at risk, and processes within LTS Group.
- It is as simple as possible for an individual to report concerns about harm or risk and clear procedures are implemented where safeguarding and child/adult protection issues arise. Where concerns are reported LTS Group will ensure that individuals are supported.
- LTS Group has robust policies and procedures in place, which are reviewed and updated at least every 12 months.

- LTS Group stays up to date with developments on safeguarding best practice, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- LTS Group will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.
- LTS Group will work in partnership with other services (including local authority children's and adult social care) to ensure that those who are identified as being at risk of abuse are protected.
- LTS Group will ensure that staff has access to all relevant training that meets local and national safeguarding requirements.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

4. The Role of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is a senior member of staff of LTS Group with the necessary knowledge, experience, and training to take the lead responsibility for safeguarding and child protection.

The DSL is the point of contact for anyone in the business who is concerned about a child.

The role of the DSL includes:

- Ensuring that all relevant staff and candidates have received at induction safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) appropriate to their role and continue receiving training to enable the development of skills and good practice when working with children/adults at risk.
- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by staff members, partner agencies or candidates.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to candidates or children/adults at risk that they work with.
- Liaising with Designated Safeguarding Leads in partner organisations.
- Acting as a source of support, advice and expertise for staff and candidates with concerns and liaising with other agencies and professionals.
- Supporting staff and candidates involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Referring any allegations of abuse or safeguarding concerns to the relevant children or adult social care and if relevant, the police and/or the Local Authority's Designated Officer (LADO). In order to do this, the DSL will need to consult the Local Safeguarding Partnership Arrangements/Local Safeguarding Adult Board for the area in which the organisation is located. Further details on referral routes are located in Working Together to Safeguard Children (2026), Care and Support Statutory Guidance, and in Keeping Children Safe in Education (2026).
- Reporting concerns to the Disclosure and Barring Service (DBS), this may be where a staff member or candidate has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and the company believes they pose a risk to children/vulnerable adults. The DSL will complete the necessary referral documents to the DBS and liaise with them thereafter if they have any further questions regarding the staff member or candidate.
- Keeping senior management apprised of any safeguarding incidents and their outcome.
- Liaising with LTS Group's Compliance Manager and senior management regarding training and skill development programmes available to staff and candidates.
- Policy development (or overseeing this, including ensuring that all policies are updated as and when needed, but in any event on an annual basis).
- Ensuring clear cover arrangements are in place whenever the DSL is unavailable, so that safeguarding concerns can be raised and acted upon without delay.

- Understanding and applying current information-sharing requirements and ensuring safeguarding records are clear, factual, secure and record the rationale for decisions.
- Maintaining awareness of the additional safeguarding and online risks faced by children with SEND and other vulnerabilities, and encouraging a culture of listening to children and taking account of their wishes and feelings.

5. Recruitment and Selection Process

LTS Group is also committed to protecting children and adults at risk through a careful recruitment and selection process (Safer Recruitment), a Whistleblowing Policy and guidance on appropriate behaviour (Code of Conduct). These policies should be read alongside this policy.

LTS Group's rigorous procedures, following APSCo's Compliance+ process ensures that any candidate found to have a history of unacceptable conduct or practice, will not be placed.

In addition, LTS Group:

- Ensures all pre-appointment checks comply with statutory guidance (KCSIE 2026) and applicable safer recruitment and regulated activity requirements.
- Applies the 2026 definition of regulated activity and obtains the appropriate level of DBS and barred-list information where the role requires it.
- Will, where candidates are supplied to schools, colleges or other education settings, cooperate with the placement to confirm that required safeguarding and pre-employment checks have been completed.

6. Responding to Safeguarding Concerns

All staff have a responsibility to protect children/adults at risk. This includes:

- Observing LTS Group policies and processes including any Code of Conduct
- Attending the recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date
- Reporting any concerns arising from meeting candidates or carrying out pre-placement checks to the DSL without delay and making a clear written record of all relevant information to be passed to the DSL
- Reporting any concerns arising from organisation visits/placements to the Designated Safeguarding Lead at the relevant organisation and confirming that this has been done to LTS Group DSL
- Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.

All candidates working through LTS Group are expected to keep children and vulnerable adults safe by:

- following LTS Group policies including the Code of Conduct;
- following the Safeguarding Policy of each placement, including any Code of Conduct;
- making the Designated Safeguarding Lead at the placement aware of any concerns regarding any children/vulnerable adults; or any adults caring for or working with those persons;
- seeking advice and support from LTS Group's DSL when they have reason to believe that their concerns have not been responded to appropriately or they have concerns about practice in the placement;
- carrying out their responsibilities for safeguarding and promoting the welfare of children;
- understand the importance of sharing information about children, young people and their families in order to safeguard children; and
- following any mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare.

All staff and candidates must also:

- Never promise a child absolute confidentiality, and explain that information may need to be shared with people who can help keep them safe.
- Listen carefully, take the child seriously, avoid leading questions, make a factual written record and report the concern without delay.
- Use professional curiosity where a child may be unable, unwilling or not ready to disclose abuse, exploitation or neglect.
- Keep their knowledge up to date, including online safety and the safeguarding implications of emerging technology and AI.

7. Dealing with Allegations of Abuse Made Against Candidates

All candidates placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, such as the Code of Conduct.

In accordance with the Care Act (2014), Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (2026), where an organisation has received an allegation that a volunteer, supply staff or member of staff who works with children/vulnerable adults has:

- behaved in a way that has harmed a child/adult, or may have harmed a child/adult;
- possibly committed a criminal offence against or related to a child/adult;
- behaved towards a child/adult in a way that indicates he or she may pose a risk of harm to children/vulnerable adults; or
- or behaved or may have behaved in a way that indicates they may not be suitable to work with children/vulnerable adults,

a referral should be sent to the LADO within one working day, giving as much detail as possible.

Details regarding allegations that meet the harms threshold and concerns that do not meet the allegations threshold (referred to as 'low level concerns'), including who will take responsibility for this once a candidate is placed, are set out in LTS Group's Allegations Policy which should be read alongside this policy.

8. Duty to Make a Referral to the DBS

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child or adult at risk, there is a legal duty on LTS Group to report that person to the Disclosure and Barring Service using the DBS referral guidance published on GOV.UK. The DBS has statutory authority to bar a person from working in regulated activity with children and/or adults at risk in the UK.

A referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

LTS Group will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with children/vulnerable adults. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a child's or adult at risk's welfare or who believe that a child or adult at risk may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

9. Whistleblowing

Candidates may find it difficult to raise concerns about colleagues, managers, people in placement or concerning how safeguarding concerns are responded to within a setting. LTS Group has a specific Whistleblowing Policy which encourages candidates to raise concerns and also provides details of outside organisations that candidates can approach for support and advice. LTS Group aims to have an open and honest culture where safeguarding is responded to effectively, and both staff and candidates feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to.

10. Summary

LTS Group will make clients and candidates aware of the Safeguarding Policy through the company website (www.ltsg.co.uk), our internal server, and our registration and induction process.

All staff, temporary workers, candidates and contractors must be aware that they have a professional duty to share information with other recruitment firms in order to safeguard children/adults at risk. The public interest in safeguarding children/adults at risk may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by LTS Group.

All tutors and other candidates working with children must read KCSIE 2026 Part One in full and follow the safeguarding procedures of the placement in which they are working. The KCSIE Part One overview may be used as a quick-reference aid, but it does not replace Part One.

Concerns about data protection must not prevent necessary safeguarding information from being shared lawfully and appropriately, and safeguarding information must be recorded clearly and stored securely.

11. Key Safeguarding Updates for 2026/27

- KCSIE 2026 is in force from 1 September 2026. All staff working in schools and colleges are expected to read Part One in full; the overview is supplementary only.
- Working Together to Safeguard Children 2026 strengthens child-centred, inclusive and anti-discriminatory practice, Family Help, information sharing and responses to hidden and overlapping harms.
- KCSIE 2026 strengthens expectations around online safety, generative AI, mobile phones, information security, DSL cover, children with SEND, young carers and children with medical conditions.
- Changes to regulated activity in 2026 remove the previous supervision exemption in relevant circumstances; LTS Group will apply current DBS and barred-list requirements to roles it supplies.
- The statutory information-sharing duty and updated guidance take effect from 30 September 2026 and will be reflected in LTS Group safeguarding practice.

Appendix

List of relevant legislation and guidance governing this policy.

Relevant Legislation and Guidance

Legislation / Guidance	Web Address
Keeping Children Safe in Education 2026 (in force from 1 September 2026)	KCSIE 2026
Working Together to Safeguard Children 2026 (HM Government)	Working Together 2026
Children Act 1989	Children Act 1989
Children Act 2004	Children Act 2004
Care Act 2014	Care Act 2014
Domestic Abuse Act 2021	Domestic Abuse Act 2021
Disqualification under the Childcare Act 2006	Disqualification guidance
Rehabilitation of Offenders Act 1974	ROA 1974
Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')	Prevent Duty

Legislation / Guidance	Web Address
Modern Slavery Act 2015	Modern Slavery Act
Human Rights Act 1998	Human Rights Act
Female Genital Mutilation Act 2003	FGM Act
Safeguarding Vulnerable Groups Act 2006	SVGA 2006
United Nations Convention on the Rights of the Child (UNCRC) 1989	UNCRC
Crime and Policing Act 2026 (regulated activity changes)	Regulated activity 2026
The Prevent Duty guidance: England and Wales (Home Office)	Prevent Duty guidance
Care and Support Statutory Guidance	Care and Support guidance
Information sharing to safeguard children and young people 2026	Information Sharing 2026
Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium)	Safer working practice
What to do if you're worried a child is being abused (HM Government)	What to do if you're worried
Data Protection Act 2018 and UK GDPR	Data Protection and UK GDPR
Disclosure and Barring Service	Disclosure and Barring Service (DBS)

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Approval

Signed	<i>Eddi Banks</i>
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