



Safeguarding & Low-Level Concerns

Guidance and Policy

v.8.2 - May 2026

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1. Statement

1.1 At Language Tree the welfare of all our students, whether they are children or adults, is of paramount importance.

1.2 All students, whatever their age, culture, ability, gender, communication ability, racial origin, religious beliefs or sexual identity, have the right to protection from harm.

1.3 Everyone at Language Tree is committed to providing a safe environment for any student whether they are:

- studying at the school
- staying with one of our approved homestay providers
- participating in an organised activity
- travelling with a recommended transport service
- or enjoying free time as provided by the school

1.4 It is our priority to provide a caring, positive, safe, and stimulating environment in which all students should feel comfortable at all times, be protected from potential risks while also being able to fully participate in the course they have joined us for.

1.5 Safeguarding is not just about protecting students from harm. It includes consideration and awareness of child and adult safety, bullying, racist abuse and harassment, online safety and radicalisation, and awareness of how to raise low-level concerns.

2. Principles

2.1 This Guidance and Policy document is based on the following principles:

- All people should be treated with respect and dignity
- All children and adults have the right to safeguarding from potential harm and abuse
- All individuals have a role in ensuring a safe and comfortable environment at all times
- Everyone has a responsibility to report any concerns about children or adults

3 Aims

3.1 This Guidance and Policy document, in conjunction with the referenced documents, has the following aims:

- To explain our commitment to the safeguarding of children and adults
- To inform all employee adults at Language Tree of their responsibilities when working with children and adults at our school
- To promote good practice by providing guidance and advice to children, adults, and staff
- To provide a clear procedure (including documentation and escalation) to be implemented in the event of concerns
- To ensure awareness of our safeguarding principles and procedures

4. Our school & courses

4.1 Our courses

Language Tree offers English language and culture courses on a seasonal basis from the Penryn Campus.

We may also offer closed group courses from other locations.



We accept the following students on courses with us:

- Adults (aged 18+) on our Language Experience programmes
- Individual students and school groups (aged 13-17) studying on our Junior Summer School courses.
- All school / private groups must be accompanied by group leaders – who act *in loco parentis* - to the ratio of at least 1 group leader to every 10 students.
- Family groups (aged 9+) studying on our Family Summer School courses. All family groups must include at least one parent / guardian / relative and one child.

In exceptional circumstances, we may accept students outside these age ranges. In these circumstances, additional risk assessments will be made and explicit arrangements will be discussed and agreed with the parents / guardians / group leaders.

4.2 Our surroundings

We take all reasonable steps to ensure a safe and comfortable learning environment, by:

- Performing regular risk assessments on all buildings, classrooms and other rooms used in the delivery of our courses.
- Accompanying site, excursion, teaching site visitors at all times and providing a clear system to register and recognise visitors.
- Maintaining a good standard of cleanliness at all times, where necessary providing culturally supportive measures.
- Ensuring there is an appropriate fire detection system on all premises with a clear evacuation procedure.
- Ensuring the presence of a member of staff with First Aid training at all times.

4.3 Our staff

We take all reasonable steps to ensure our staff are well selected and trained by:



- Having a named Designated Safeguarding Lead (DSL.) The DSL is responsible for leading all aspects of safeguarding and child protection at Language Tree. The DSL will ensure that all staff understand and follow safeguarding procedures, will act as the primary point of contact for safeguarding concerns and will liaise with external agencies as needed.
- Providing appropriate safeguarding training for all staff. This includes staff completion of British Council Safeguarding Training and bespoke Language Tree systems training direct from the Safeguarding Lead once per year.
- Giving clear guidelines on appropriate behaviour and reporting requirements.
- Encouraging an open and trusting environment where concerns can be aired in confidence.
- Ensuring that all staff have read and agree to uphold our policies, procedures, and principles.

4.4 Our students

We take all reasonable steps to ensure our students are informed of our Safeguarding Principles by:

- Highlighting our terms and conditions regarding acceptable behaviour in advance of arrival
- Providing students with a clear and detailed induction, as well as safety advice, on arrival.
- Issuing all students with the Student Handbook that includes emergency contact details.
- Monitoring attendance and investigating a missing student immediately.

4.5 Our responsibilities

We take all reasonable steps to meet our legal safeguarding responsibilities by:

- Requiring our staff to report any incident, allegation, evidence, or suspicion of abuse, safeguarding need, wellbeing or low level concern to the Safeguarding lead, or other appropriate organisation.
- Following safer recruitment strategies for all posts.
- Referring any such incident to statutory authorities as required by law.
- Implementing this policy, and all supporting documents, and reviewing everything on a yearly basis.
- Adhering to our staff code of conduct.
- Providing and upholding a student code of conduct.
- Appropriate vetting and training of homestay hosts.
- Operating under the campus filtering and monitoring systems for safe internet use and advise homestay hosts on what to do with concerns regarding internet use by our students

Supporting Documents:

- *Staff Handbook*
- *Safeguarding and Low Level Concerns Guidance and Policy*



- *Student Handbook*
- *School Risk Assessments*
- *Safeguarding Incident Reporting Forms*
- *Group Leader Handbook*
- *Critical Incident Management Policy*

5. Our accommodation options

Language Tree is committed to providing a safe environment for any person who chooses homestay / host family or residential accommodation organised by the school.

It is also common for students and their families to find their own accommodation privately. In this situation, we explicitly inform students that we do not hold the same level of responsibility as when the students choose from one of our homestay providers or our residential accommodation.

5.1 Accommodation Options

Accommodation Type	Safeguarding Policy	Maximum length of stay
Homestay accommodation provided by one of the school's registered homestay providers	Safeguarding policy applies	28 days
Residential accommodation on one of our study holiday programmes	Safeguarding policy applies	28 days
Accommodation organised privately by the student to stay with family, friends or in privately rented accommodation. <small>(Under 18s, without parents or guardians, are not permitted to stay in privately rented accommodation)</small>	Safeguarding policy only applies to under 18s.	Under 18 – maximum of 28 days. Over 18 – no limit.
Accommodation suggested us but privately organised between the student and the accommodation provider	Safeguarding policy does not apply	Over 18s only
Accommodation independently organised by the student without Language Tree input	Safeguarding policy does not apply	Over 18s only

5.1.1 Our homestay hosts

We take all reasonable steps to ensure our hosts are well selected and well trained. This includes:

- Inspecting all potential hosts in advance and revisiting all active hosts regularly.
- Assessing host family homes for appropriate numbers of students up to a maximum of three per home.
- Having a clear understanding of all members of a host family
- Completing DBS checks for all members of a host family over 18 years old.
- Establishing and maintaining an open and positive dialogue with all hosts.
- Keeping hosts fully informed about the students they will be hosting including dietary needs and interests.
- Providing all hosts with our Host Family Handbook to provide guidance and support for successful hosting.
- Where necessary, providing training opportunities for host families to develop their hosting skills.
- Ensuring that all hosts have read and agree to uphold our policies, procedures, and principles.



5.1.2 Residential Accommodation

We endeavour to ensure that our staff, group leaders and our accommodation hosts appropriately support our students by:

- Giving students and group leaders a welcome tour on arrival.
- Establishing and maintaining a positive relationship with the accommodation staff.
- Ensuring DBS checks have been completed for all accommodation staff and that all other necessary checks and insurances are in place and up to date.
- Providing separate male and female accommodation for under 18s and ensuring an appropriate mix of both male and female group leaders and Language Tree residential staff.
- Providing separate bathroom facilities for students and staff.
- Completing DBS / International Police checks for all group leaders.
- Ensuring that residential accommodation is not overcrowded and is only used by a suitable number of students.



- Working with group leaders to ensure the allocation of rooms is appropriate for the group and individual students.
- Inspecting the residential accommodation regularly, reacting to any concerns immediately.
- Providing regular and appropriate safeguarding training for all staff.
- Ensuring that all staff are fully aware of the extra responsibilities of working and living on a residential school site and the continuing responsibilities whether on or off shift.

5.2 Our students

We take all reasonable steps to ensure our students are fully informed about the type of accommodation they have chosen by:

- Giving students clear guidelines on acceptable behaviour in advance of arrival.
- Collecting mobile phone numbers for every student.
- Providing parents with a 'what to bring' checklist in advance.
- Putting students in touch with their host family to make initial contact and to discuss any key issues regarding their accommodation such as dietary requirements and allergies.
- Asking students to give us information about their dietary requirements and personal preferences in order to ensure the accommodation fully meets their needs.
- If more than one student is placed with a particular host, it will only be done with the express consent of all parties involved. We only normally place more than one person with a host if the students already know each other and have specifically requested that arrangement.
- Obtaining regular feedback from students with regard to their home environment.
- Reacting swiftly to deal with any uncertainty or discomfort.
- Ensuring gender and identity parameters are considered.



6. Social Activities & Excursions

6.1 Language Tree provides a supervised leisure programme as an integral part of its Summer School programme. Bespoke leisure programmes are also produced for closed group courses throughout the year.

6.2 During our Summer School courses, there is a comprehensive activity and excursion programme that students are automatically registered on as part of the course they have booked.

6.4 We take all reasonable steps to ensure our students are safe during all activities and excursions, including:

- Making age-appropriate choices for all activities and excursions.
- Only working with accredited providers with professional supervision for activities that involve more risk such as, but not limited to, water sports.
- Preparing students in advance for upcoming activities and excursions.
- Listening to feedback after each activity and excursion.
- Recruiting staff with relevant qualifications and also providing in-house training to all staff who accompany students on social activities and excursions.
- Ensuring all staff and group leaders understand our risk assessments and their responsibilities while on social activities and excursions.
- Providing supervisors with appropriate access to students' contact details, and medical declarations.
- Providing an appropriately-stocked activity pack with information relevant to the day.
- Maintaining an appropriately-stocked first aid kit that is taken on all excursions.
- Ensuring First Aid trained staff are on all excursions.
- Performing a risk assessment in advance of every activity or excursion.
- Briefing supervisors and group leaders in advance of all excursions and activities.
- Regularly reviewing our risk assessments.

Supporting Documents

- *Risk Assessments*
- *Critical Incident Management Policy*
- *Group Leader Handbook*
- *Student Handbook*
- *Staff Handbook*





7. Travel & Transport

We take responsibility for travel and transport in three situations:

1. Airport transfers to transport students from their point of arrival in the UK to Language Tree and their accommodation. In this case, we would also usually offer the return journey at the end of their stay too.
2. To facilitate excursions and social activities which are beyond walking distance from Language Tree.
3. When required, to provide transport to Language Tree from the student accommodation.

In many situations students will arrange their own transport to arrive at Language Tree at the start of their course. Similarly, students may also be happy to make their own transport arrangements to attend their course. In these situations, we are happy to provide information about different transport options but this Safeguarding Policy will not apply, students use this form of transport at their own risk. Of course, we will always endeavour to give all students as much information as possible to support safe travel.

7.1 Airport transfers

Where we are asked to assist with airport transfer, we would normally do this through the use of private transport, though occasionally we may also organise the transfer with public transport.

We endeavour to ensure that all students are protected from harm when using public transport and private hire vehicles by:

- Ensuring that all drivers are DBS checked and professionally qualified.
- Only working with fully accredited and licensed suppliers who provide a high level of care to passengers and use high-quality vehicles.
- Making bookings far enough in advance to avoid potential problems.
- Maintaining an open dialogue and positive relationship with suppliers.
- Sending students and their parents journey details in advance of arrival.
- Keeping in touch with all parties leading up to the start of the journey so everyone can be kept informed of any delays or other transport issues.
- If a student aged under 18 is travelling by public transport as part of an airport transfer, we would usually send a member of staff to accompany them throughout the airport transfer up to the point of check in. All arrangements would be made through close discussion with the parent / guardian.

7.2 Transport for excursions & social activities

We generally use private transport to facilitate all excursions and social activities that are not within walking distance of the school.

We endeavour to ensure that all our students, staff and group leaders are protected from harm when travelling in our private hire vehicles by:

- Ensuring that all drivers are DBS checked and professionally qualified.
- Only working with fully accredited and licensed suppliers who provide a high level of care to passengers and use high-quality vehicles.
- Making bookings far enough in advance to avoid potential problems.
- Maintaining an open dialogue and positive relationship with suppliers.
- Ensuring that our staff have contact details for the driver to stay in touch regarding pick-up and drop-off times and locations.



7.3 Transport to Language Tree

Where we provide transport to attend Language Tree, we would normally do this through the use of private transport or we organise for our hosts to provide transport for students.

- Providing students and hosts with our weekly timetable to understand required timings
- Only using our preferred private hire partners to provide daily transport to the school.



8. How to deal with disclosures

8.1 It is important you are fully familiar with these guidelines so you are ready if, one day, someone discloses to you. It can be extremely distressing to receive a disclosure of abuse or harm from a child or an adult and Language Tree is here to help our staff through the process. Abuse can take place in any family, institution or community setting, by telephone, or over the internet. Abuse can often be difficult to recognise, however, it is important to know the indicators of abuse and be alert to the need to consult further.

8.2 Staff are therefore expected to attend Safeguarding Sessions held by the DSL, and additional training can be signposted by the DSL to individual staff. You must take any disclosure and/or allegation seriously and seek advice from the Designated or Deputy Safeguarding Lead immediately.

8.3 When handling a disclosure, it is essential that you take the time to receive all the information while also remaining calm and professional at all times. It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional protection agencies, following a referral from the designated officer.

8.4 The Safeguarding Incident Report Forms must be used to document events.

8.5 How to handle a disclosure –

Receive

- Listen to what is being said without displaying shock or disbelief.
- Accept what is being said without judgement.
- Take it seriously and thank the person for sharing this information with you.

Reassure

- Reassure the person, but only so far as is honest and reliable.
- Don't promise confidentiality – you have a duty to report your concerns.
- Gently tell the individual that you will need to tell some people, but only those whose job it is to protect and offer help.
- Acknowledge how difficult it must have been to talk.
- Never agree to keep secrets – be honest.
- Do reassure the person that they are right to be speaking out.

React

- Listen quietly, carefully and patiently.
- Do not investigate, interrogate or decide if the individual is telling the truth.
- Don't ask leading questions, e.g. "What happened next?"
- Do ask open questions like "Is there anything else that you want to tell me?"
- Do not criticise the alleged abuser; the person may love him/her and a reconciliation may be possible.
- Do not ask the person to repeat what they have told you to another member of staff.
- Explain what you have to do next and whom you have to talk to.
- Do not use diagnostic language: 'She has bulimia/He is self-harming.'

Record

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes in case they are required by a court of law.

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- Record the date, time, place, words used by the child and how the child appeared to you.
- If relevant, note on a diagram the presence of any marks or bruises.
- Record statements and observable things, not your interpretations or assumptions – keep it factual.
- Do not assume anything – don't speculate or jump to conclusions.
- Complete Safeguarding Incident Report form with your DSL.

9. What happens next?

9.1 The DSLs will review the disclosure / Safeguarding concern and if it is apparent that the individual is suffering or is at risk of suffering harm, appropriate referrals must be made.

9.2 The individual (subject to their age/understanding) and, when concerning a child, the parents/primary carers will be told that this referral has been made, unless to do so would increase the risk to the child.

10. Reporting directly to other agencies

10.1 Staff should follow the reporting procedures in this policy, however, they may also wish to share information directly with LADO/MARU, NSPCC, Police, Prevent:

- In the event that the Designated and the Deputy Safeguarding Leads are unavailable
- The situation is an emergency
- They are convinced that a direct report is the only way to ensure the individual's safety
- For any other reasons they make a judgement that the direct referral is in the best interests of the individual

11. Low-Level concerns about a member of staff / adult

As part of Language Tree's approach to Safeguarding, we aim to ensure an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant, it means that although the adult's behaviour towards a child does not meet a cause for significant concern, or warrant a full safeguarding referral, it is still concerning in some way.

In any kind of situation like this, we encourage people share their concerns with either the Designated Safeguarding Lead or the Deputy Safeguarding Lead.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with our organisation's staff code of conduct, including inappropriate conduct outside of work, and,
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral but may merit consulting with and seeking advice from your Designated Safeguarding Lead.



11.1 Once staff have shared what they believe to be a low-level concern, the DSL will:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- speak to any potential witnesses
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by other relevant external agencies, where they have been contacted);
- review the information and determine whether the behaviour:
 - (i) is entirely consistent with their staff code of conduct and the law;
 - (ii) constitutes a low-level concern.

11.2 While responding to any incident, the Director and/or DSL will make appropriate notes of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
- all external conversations
- the action taken and the rationale for the decision taken.

11.3 Possible Outcomes from a low-level Concern

If it is determined that the behaviour is entirely consistent with the school's staff code of conduct and the law, the Director will:

- update the individual in question and inform them of the outcome.
- speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law.
- where appropriate, all parties will be encouraged to reflect on the event and consider what can be learnt for the future

If it is found that the low-level concern is justified, the DSL will act in accordance with this policy and the disciplinary process will come into effect.

12. Concerns about a member of staff, the DSL or Director:

- All concerns about a member of staff should be referred directly to Joel Ashton, Director.
- Concerns about Joel Ashton, Director, should be made to the Police via 101 or online – check local authority website at time of concern for best route.



Appendix 1

Safeguarding Incident Report Form

- All allegations, complaints, or suspicions of harm of abuse must be recorded as close as possible to the time of the incident.
- **Safeguarding leads must be informed immediately: If you are initiating the use of this form, you need to alert a Safeguarding Lead.**
- Details of incidents should be recorded in as much detail and as accurately as possible.
- Any disclosure of abuse must be a reflection of what was actually said.
- **Do not try and interpret any of the information; just record what was said or witnessed.**

At risk person: Name, Sex, DoB/Age	Name and initials of <u>any</u> inputter on this form
Type of incident	Date this form was initiated, and Staff Member Name

Details of Incident (to be completed by the person who initiates form):

DATE and Time	INCIDENT LOG NOTES	Staff Member INITIALS

Please continue on an additional sheet if required – please use this same form for each additional page and add a page number.



Appendix 2

Low-Level Concern Report Form

Handler	Issue
Date of initial concern raised	Reporting Staff member

Details:

Follow Section 11 of Safeguarding and Low Level Concerns Guidance and Policy Document, including any files or notes on this form.



Appendix 3

Language Tree – Safeguarding Reflection

To be completed after a Safeguarding incident

Name	
Role at Language Tree	
Date of incident	

Did you find the reporting process easy?	
What was your involvement in the incident?	No specific details of the incident are required here
Were you aware of the Safeguarding policy & procedures at Language Tree	
Who did you report the incident to?	
Were you satisfied with their response?	
Do you feel action was taken quickly enough?	
Do you feel the actions were appropriate?	
Have you felt supported by Language Tree?	
Do you feel anything could have been done differently?	

If you have any comments you would like to add here, please do. All information given is used to improve and monitor our systems.

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Thank you for taking the time to complete this form.
We are always here to help and discuss any issues you may have.



Designated Safeguarding Lead:
 Janey Ashton / 07828 021754 / marimonarcha@gmail.com

Compliance and Governance

This document was reviewed in May 2026 and changes made.

- Designated Safeguarding Lead: Janey Ashton | marimonarcha@gmail.com | 07828 021754
- Deputy Safeguarding Lead: Joel Ashton | joel@languagetree.co.uk | 07957 497937

Next review date is October 2027 or following a learning review.

<u>Date</u>	<u>Lead</u>	<u>Changes Made</u>
January 2018 v.1	Joel Ashton	NA
August 2020 v.2	Janey Ashton	How to handle a disclosure information added
April 2022 v.3	Janey Ashton	Full review undertaken: Low Level Concerns information added Safer Recruitment link added Formal training standards included
May 2022 v.3.1	Joel Ashton	Additional review for summer 2022 season – no changes made
June 2023 v.4	Joel Ashton	Final review for summer 2023 – no changes made
April 2024 v.5	Janey Ashton	Full review undertaken: Slight wording change to (1.2) Age parameters stipulated (4.2) British Council Link to SG training added, and Care Inspectorate link removed (no longer relevant) (4.3) Document list updated – <i>Safeguarding Essential Information Leaflet</i> removed from Supporting Documents list – no longer in use (4.5)

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		<p>Removal of 'Student What to Bring Checklist' from Supporting Documents list – no longer issued in this manner (6.0).</p> <p><u>Appendix 1 Safeguarding Incident Report Form</u> updated for ease of use. Checked that this form matches Dropbox available form.</p> <p><u>Appendix 2 Low Levels Concern Form</u> reviewed – slight wording change made</p> <p><u>Appendix 3 Added Safeguarding Reflection form</u> (New 2024).</p>
October 2024 v.7	Janey Ashton	<p>Review following Summer 2024 incidents. Learning points actioned by changes to:</p> <p>Section 4.5 – Staff code of conduct.</p>
June 2025 V.8	Joel Ashton	<p>The following sections reviewed and wording updated to reflect current provision:</p> <p>4, 5, 6, 7.</p>
May 2026 v.8.2	Janey Ashton Katy Daly	<p>SG contacts checked and updated on front page.</p> <p>The following sections had minor word changes to update to current policy document changes:</p> <p>1.2: Wording to include 'harm and abuse.'</p> <p>4.1: Family group age range changed</p>



		<p>4.3 Outdated link for BC SG training removed</p> <p>4.5 Student Code of Conduct mentioned here now and safer recruitment strategies and vetting and training of homestay hosts added. Statement on safe internet use added.</p> <p>5. Unnecessary wording removed pertaining to care of students</p> <p>5.1 Caveat added to accommodations organised privately</p> <p>5.2 Minor word change regarding dietary requirements</p> <p>8.1 Minor word change</p> <p>10: Updated to include mention of LADO alongside MARU</p> <p>12 Removed mention of Board of Directors</p> <p>Updated version of Safeguarding Incident Report Form included</p>
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