



Mary Hare Policy: SCH014

Apprentice Safeguarding and Prevent Policy

Policy Owner: Joy Rosenberg
Date Created: 12 February 2025
Approved by: Care & Education

Next review date: Autumn 2026



Securing the future of deaf children and young people

Registered charity 1048386

Contents

Safeguarding Team Contact details	3
Safeguarding Referrals: Key contacts within the local authority	3
Introduction.....	4
Policy Aim	5
Definitions	5
Key Principles of Adult Safeguarding	5
Recognising the signs of abuse.....	6
Types of abuse.....	6
• Physical abuse	6
• Domestic violence/ Domestic abuse	6
• Sexual abuse.....	6
• Psychological or emotional abuse	7
• Financial or material abuse	7
• Modern slavery.....	7
• Discriminatory abuse.....	7
• Organisational or institutional abuse	7
• Neglect or acts of omission	7
• Self-neglect	7
Radicalisation to Terrorism.....	7
Reporting Concerns	8
Allegations against staff.....	10
Safe Recruitment & Selection.....	10
Training and Awareness	10
Confidentiality and Information Sharing	11

Safeguarding Team Contact details:

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Joy Rosenberg	j.rosenberg@maryhare.org.uk 01635 244298
Deputy Designated Safeguarding Lead (DSL)	Sarah Davis	s.davis@maryhare.org.uk 01635 244298
Chair of Governors	Tim Polack	governors@maryhare.org.uk
Safeguarding Governor	Sarah Butcher	governors@maryhare.org.uk
Deputy Safeguarding Governor	Daniel Clements	governors@maryhare.org.uk

Wider Safeguarding Team – Mary Hare School		
Robin Askew	Principal/ CEO	Safeguarding@maryhare.org.uk
Emma Kennett	Vice Principal/DSL Lead for School	

Safeguarding Referrals: Key contacts within the local authority

If a person is in immediate danger at any time, left alone or missing, you should contact the police directly using 999/101

Role	Name	Contact details
West Berkshire Adult Safeguarding Team	Duty Social Worker	01635 519056 Safeguardingadults@westberks.gov.uk
PREVENT Officer, Thames Valley Police	n/a	077883071787 preventreferrals@thamesvalley.pnn.police.uk
CQC	n/a	03000 616161 enquires@cqc.org.uk

Introduction

- Mary Hare is committed to protecting and preventing abuse towards its apprentices and providing them with support or guidance. Our policy and procedures apply to the apprenticeship provision at Mary Hare. We aim to create an environment where all learners can thrive and feel safe. Safeguarding is everyone's responsibility, and we expect all staff, stakeholders, and visitors to adhere to the guidelines set out in this policy.
- Mary Hare School believes that Apprentice Safeguarding means protecting an apprentice's right to live in safety, free from abuse and neglect. (Care Act 2014) and that all staff, Governors, Visitors and Volunteers working with them have a legal and moral responsibility to protect them and to act immediately to prevent abuse and provide support and guidance.
- This policy is available on the Mary Hare website [Policies and key info | Mary Hare School](#) and should be read alongside:
 - Safeguarding and Child Protection Policy
 - Whistleblowing Policy
 - Staff Code of Conduct
 - Safer recruitment policy

Policy Aims

- The policy aims are:
 - To provide all staff, Governors, Visitors and Volunteers with the necessary information to enable them to meet their safeguarding and prevent duty responsibilities, including awareness, identification and reporting.
 - To ensure consistent good practice and sound procedures are followed.
 - To ensure that all staff (as above) understand that apprentices have the right to protection regardless of age, identification, gender, race, culture, or disability.

Definitions

- The Care Act 2014 definition of an adult at risk of abuse: Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)
 - has needs for care and support (whether or not the authority is meeting any of those needs),
 - is experiencing, or is at risk of, abuse or neglect, and
 - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Key Principles of Apprentice Safeguarding

- We have established a strong and effective culture of safeguarding at Mary Hare, including safer recruitment practices which are in line with national legislation. We aim to ensure that all apprentices are able to feel supported and safe so that they are able to learn and develop. Staff are able to feel confident to professionally challenge when necessary.
- Mary Hare is guided by the six key principles that underpin adult safeguarding as set out in The Care Act 2014, and Making Safeguarding Personal. Mary Hare aims to demonstrate and promote these six principles in our work with apprentices. We have an established strong and effective culture of safeguarding at Mary Hare:
 - **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
 - **Prevention** - It is better to take action before harm occurs.

- **Proportionality** - The least intrusive response appropriate to the risk presented.
- **Protection** - Support and representation for those in greatest need.
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in delivering safeguarding.

Recognising the signs of abuse:

- Abuse can occur anytime, anyplace and to or by anyone. Young adults may suffer abuse from members of the family, friends, staff or strangers. In the majority of cases the abuser is known to and often trusted by the person. Employees, governors and volunteers are well-placed to identify abuse, and staff are aware that changes in patterns of behaviour could be an indicator that something is different for the young person.
- The apprentice may say or do things that let you know something is wrong. It may come in the form of a disclosure, complaint, or an expression of concern.
- Mary Hare ensures that all staff are trained to respond promptly and effectively to any concerns relating to the safety or wellbeing of apprentices. Staff are aware of who they can report concerns to.

Types of abuse

- The Care Act 2014 defines the following ten areas of abuse when working with adults. Wigan borough also includes self-neglect as an additional category. These are not exhaustive but are a guide to behaviour that may lead to a safeguarding enquiry. This includes:
 - **Physical abuse** - Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
 - **Domestic violence/ Domestic abuse** - This could be any of the indicators of abuse relating to physical, psychological/emotional, sexual or financial but by a person with whom you have a close family or intimate relationship such as a partner, child, parent.
 - **Sexual abuse** - Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography. Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- **Psychological or emotional abuse** - Including 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 those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory abuse** - Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational or institutional 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 long-term ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.
- **Neglect or 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 behavior, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. There is a difference between what constitutes a safeguarding incident that requires a statutory response and an incident that is rooted in concern for someone's general wellbeing.
- In addition, we are vigilant about the categories of abuse defined in Keeping Children Safe in Education 2024 and recognise that these may also apply to apprentices.

Radicalisation to Terrorism and Prevent and Protect Duty

- History and Objectives of Prevent and Protection Duty (PPD):
The 2015 Counter Terrorism Act Section 26 gives statutory duty to "specified authorities" to have "*due regard to prevent people from being drawn into terrorism*" with objectives to:
 - Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
 - Prevent people from being drawn into terrorism and give them advice and support.
 - Work with sectors and institutions where there are risks of radicalisation that we need to address.

- The Government through its Prevent programme has highlighted how some adults may be vulnerable to exploitation and radicalisation and involvement in terrorism. Signs and indicators of radicalisation may include:
 - Being in contact with extremist recruiters.
 - Articulating support for violent extremist causes or leaders.
 - Accessing violent extremist websites, especially those with a social networking element.
 - Possessing violent extremist literature.
 - Using extremist narratives to explain personal disadvantage.
 - Justifying the use of violence to solve societal issues.
 - Joining extremist organisations.
 - Significant changes to appearance and/or behaviour.
- Principles of PPD for Mary Hare Apprenticeships:
 - In accordance with Office for Students, Ofsted and Education Skills Funding Agency (ESFA) guidance, ensuring freedom of speech (within the law) on campus, online and within the employer setting, protecting the importance of academic freedom.
 - Partnering/liaison
 - Mary Hare School (safeguarding policies which are already in place)
 - Partner university's prevent guidance
 - Risk assessment for the postgraduate programme and apprenticeship completed
 - Postgraduate application context is part-time postgraduate training in audiology and education of the deaf, a low prevalence disability which translates to a small professional population nationally. Apprentices (n<100) are mature professionals who attend face-to-face lectures just four (Year 2) or 5 (Year 1) weekends per year.
 - Action Plan is proportionate to our risk level given our context.
 - Awareness Training completed by Programme Leadership
 - External speakers and placement managers
 - Along with permanent staff recognise the importance of academic freedom and freedom of speech
 - Are invited for lectures or mentoring.
 - Informal guidelines for selection include being experts in our context and mostly known by Programme Leaders
 - National course providers meet with Programme Leader regularly
 - IT PPD issues are covered in Mary Hare IT policies
 - This guidance document signposted in induction materials and sessions
 - Student representation on Boards of Study
 - Welfare/Pastoral care and tutorial routes made known as above and at induction
 - Student issues needing discussion are handled in programme team meetings.

Reporting Concerns

- Any employee, employer, governor or volunteer who becomes aware that an apprentice is or is at risk of, being abused or radicalised must raise the matter immediately with the DSL for Apprentices, Joy Rosenberg (j.rosenberg@maryhare.org.uk), or in her absence the DDSL or a member of the safeguarding team (safeguarding@maryhare.org.uk)
- A centrally held Apprenticeship Safeguarding log for all identified safeguarding apprenticeship concerns will be managed and maintained by the DSL/DDSL identified in this policy.

- If an apprentice discloses a safeguarding issue to you, you should:
 - Listen to show that you believe them. Allow them time to talk freely and do not ask leading questions.
 - Stay calm and do not show that you are shocked or upset.
 - Tell the person they have done the right thing in telling you. Do not tell them they should have told you sooner.
 - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
 - Write up your conversation as soon as possible in the person's own words. Stick to the facts, and do not put your own judgement on it.
 - Initially contact the DSL for apprentices by email marked urgent if necessary. A phone call or online meeting will be imminently arranged where you will need to provide details such as time, date, location, details of concern and actions taken. Aside from these people, do not disclose the information to anyone else.
 - When reporting the incident, use the actual words spoken by the person wherever possible and describe observations on their behaviour eg. Was crying, shaking, however do not interpret these behaviours.
- When necessary, the DSL or person acting on behalf of the DSL will make a referral to the Adult Safeguarding Team in West Berkshire and/or the Police. If different, a referral should also be made to the authority responsible for placing the apprentice.
- Support will be offered throughout the process in whatever way meets the needs of the apprentice.
- Working in partnership is important and we recognize the need for apprentices to be involved in their own decisions around their safety and welfare. The apprentice will be informed that advice is being sought or that a referral is being made. Where possible their wishes will be listened and responded to. Where the ability to protect themselves and keep themselves safe from the risk of harm, actual harm, maltreatment and/or neglect is considered to be a risk in itself, decisions in their best interests may be taken in regards to making a referral or informing others.
 - Support and guidance will be sought from West Berkshire Council Adult Social Care should anyone have concerns regarding an adult's capacity.
- If necessary, the Safeguarding Governors will be informed of the disclosure and/or referral.
- Bear in mind that some people may:
 - Not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
 - Not recognise their experiences as harmful

- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.
- In most situations there will not be an immediate threat and the decision about protecting the person with safeguarding needs will be taken in consultation with themselves and if needed through referral to Adult Social Care.
- The safeguarding email address is monitored throughout the school holidays on a rota basis and a member of the safeguarding team can be contacted during periods of school closure.
- **If the apprentice requires immediate protection from harm, contact the emergency services.**

Allegations against staff

- Allegations and low-level concerns against staff are managed in line with the Children Protection and Safeguarding policy and further information should be sought there.
- In addition to informing the West Berkshire LADO, West Berkshire Adult Safeguarding, Social Care and or the Police will be consulted.

Safe Recruitment & Selection

- Mary Hare is committed to safe employment and safe recruitment practices, that reduce the risk of harm to apprentices with care and support needs from people unsuitable to work with them.
- We have policies and procedures that cover the recruitment of all governors, employees and volunteers. More details can be found in the Safer Recruitment Policy, including information about the single central record.
- All employees and volunteers should be aware of the code of conduct and use of mobile phones policy (within the Child Protection and Safeguarding Policy).

Training and Awareness

- Mary Hare School will ensure an appropriate level of safeguarding training is available to its Governors, employees, volunteers and any relevant persons linked to the organisation who requires it (e.g. contractors).
- Not all staff, Governors, Volunteers or Visitors will receive specific adult safeguarding training but should be aware of procedures for reporting concerns, which are in line with the Child Protection and Safeguarding policy.
- For all employees who are working or volunteering with apprentices at risk, they are required as a

minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in Safeguarding Apprentices.
- Recognise an apprentice potentially in need of safeguarding and take action.
- Understand how to report a safeguarding alert.
- Understand dignity and respect when working with individuals.
- Have knowledge of the Apprenticeship Safeguarding and Prevent Policy.
- Key staff, including the DSL and those who have responsibility for apprentices such as module leaders, will undertake available local training such as the Adult Safeguarding Level 1.

Confidentiality and Information Sharing

- Mary Hare expects all employees, volunteers, and governors to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.
- However, information should be shared with the Local Authority if an apprentice is deemed to be at risk of harm or they pose a risk of harm to another.
- All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR).

Version number	Version Date	Review Date	Comments
Version 1	12 Feb 2025	31 August 2026	TBC by Mary Hare Governors following APAR approval