



Mary Hare Policy: SCH017

Adult Safeguarding Policy

Policy Owner: Vice-Principal (Pastoral / DSL)

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Securing the future of deaf children and young people

Registered charity 1048386

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Safeguarding Team Contact details:

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Emma Kennett	e.kennett@maryhare.org.uk 01635 244365
Deputy DSLs	Sarah Stefano - Director of Residential Care Michelle Flannery –Head of Year 7-8 Rachel Sheen– Head of Primary Charlie Hadley – Wellbeing Lead	safeguarding@maryhare.org.uk 01635 244200
Chair of Governors	Tim Polack	governors@maryhare.org.uk
Safeguarding Governor	Darren Mernagh	governors@maryhare.org.uk

Wider Safeguarding Team		
Robin Askew	Principal/ CEO	Safeguarding@maryhare.org.uk
Sarah Stefano	Director of Residential Care	
April McEniry	Head of Care Operations	
Nicky Mercer	Wellbeing Coordinator	
Helen Farthing	Wellbeing Coordinator	
Rachel Solly	Assistant Head Primary	

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 enquiries@cqc.org.uk

Introduction

1. Mary Hare School is committed to safeguarding and promoting the welfare of young adults within our school community and expects all staff, governors, visitors, and volunteers to share this commitment. Our policy and procedures apply to the educational day, residential time, and off-site activities.
2. Mary Hare School believes that Adult Safeguarding means protecting an adult'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 harm or further harm.
3. We recognise that young adults, who shall be known in this policy as 'pupils', who have special educational needs (SEN) or disabilities, or certain health conditions can face additional safeguarding challenges and are more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:
 - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration.
 - Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
 - The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
 - Communication barriers and difficulties in managing or reporting these challenges.
4. We will be alert to the extra vulnerabilities these pupils may face due to the residential nature of our setting.
5. This policy is available on the school website and should be read alongside:
 - Child Protection and Safeguarding Policy
 - Whistleblowing Policy
 - Staff Code of Conduct
 - Safer recruitment policy
6. This policy will be reviewed annually or sooner in response to legislative, regulatory or local safeguarding developments.

Legislation and Guidance

7. This policy is informed by:
 - Care Act 2014
 - Care and Support Statutory Guidance
 - Mental Capacity Act 2005
 - Human Rights Act 1998
 - Equality Act 2010
 - Data Protection Act 2018 and UK GDPR
 - Counter-Terrorism and Security Act 2015 (Prevent Duty)
 - Modern Slavery Act 2015
 - Domestic Abuse Act 2021

- Working Together to Safeguard Children 2026 (where young adults remain in education settings)
- Keeping Children Safe in Education 2026 (where applicable to residential and educational safeguarding practice)
- Berkshire West Safeguarding Adults Board Procedures

Policy Aim

8. The policy aims are:

- To provide all staff, Governors, Visitors and Volunteers with the necessary information to enable them to meet their safeguarding responsibilities.
- To ensure consistent good practice and sound procedures are followed.
- To ensure that all staff, Governors, Visitors and Volunteers are aware that the welfare of young adults is of the highest priority.
- To ensure that all staff (as above) understand that young adults have the right to protection regardless of age, identification, gender, race, culture, or disability.

Definitions

9. 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 Adult Safeguarding

10. We have an established 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 young adults 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.
11. Staff should work together in partnership with adults so that they are:
- Safe and able to protect themselves from abuse and neglect;
 - Treated fairly and with dignity and respect;
 - Protected when they need to be;
 - Able easily to get the support, protection and services that they need.
12. 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 young adults in school and care. 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. This approach recognises that adults have a general right to independence, choice and self-determination including control over information about themselves.
 - **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.

Mental Capacity

13. Mary Hare recognises that some young adults may require support to make informed decisions. Any decision relating to safeguarding, information sharing, medical treatment or welfare will be made in accordance with the Mental Capacity Act 2005.
14. Any assessment of capacity will be decision-specific and support will be provided to maximise an individual's ability to make their own decisions wherever possible.
15. Mary Hare School adopts the principles of Making Safeguarding Personal, ensuring that safeguarding responses are person-centred and outcome focused. Young adults will be supported to identify the outcomes they wish to achieve, and safeguarding arrangements will seek to support these wherever possible.

Equality, Diversity and Anti-Discriminatory Practice

16. Mary Hare School is committed to promoting equality, diversity and inclusion and to ensuring that all young adults are treated with dignity, fairness and respect.
17. We recognise that some adults may face increased vulnerability to abuse, neglect or exploitation because of protected characteristics, communication needs, disability, sensory impairment, mental health needs, ethnicity, religion or belief, sex, sexual orientation, gender reassignment, age or social circumstances.
18. Mary Hare School recognises that deaf young adults and those with communication differences may face additional barriers in recognising, reporting or communicating concerns about abuse. Staff will take appropriate steps to ensure individuals are understood, can express their views and are provided with information in a format that is accessible to them.

Recognising the signs of abuse

19. 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.
20. The young adult 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.
21. Mary Hare ensures that all staff are trained to respond promptly and effectively to any concerns relating to the safety or wellbeing of young adults. Staff are aware of who they can report concerns to and of the reporting systems of My Concern (young adult concerns) and Confide (staff allegations).

Types of abuse

22. The Care Act 2014 defines the following ten areas of abuse when working with adults. West Berkshire also includes self-neglect as an additional category and in addition other categories are emerging. 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** - Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse (as defined by the Domestic Abuse Act 2021): Psychological; Physical; Sexual; Financial; Emotional. Domestic Abuse includes controlling and coercive behaviour.
- **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 harassment, bullying, hate incidents, hate crime, victimisation, exclusion, cyber-abuse, derogatory language, threats or unequal treatment based on race, ethnicity, disability, deafness, religion or belief, age, sex, sexual orientation, gender reassignment or any other protected characteristic.
- **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 behaviour, 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.
- **Technology-Facilitated Abuse** - Abuse may occur online or through technology and can include cyberbullying, coercive control, financial exploitation, online grooming, sextortion, image-based

abuse, the misuse of artificial intelligence (AI), deepfake imagery and scams targeting vulnerable adults.

Staff should be alert to safeguarding risks associated with artificial intelligence, including deepfake images, manipulated audio recordings, online scams, impersonation, nudification technology and exploitation through AI-enabled communication tools.

- **Mate Crime** - A form of abuse in which an individual is befriended by someone who seeks to exploit, manipulate or abuse them. The perpetrator may present themselves as a friend in order to gain trust before exploiting the person financially, emotionally, physically or sexually. People with disabilities, communication difficulties or additional support needs may be particularly vulnerable to mate crime.

23. In addition, we are vigilant about the categories of abuse defined in Keeping Children Safe in Education 2026, and in the local West Berkshire Adult Safeguarding Policy and recognise that these may also apply to young adults.

Radicalisation to Terrorism

24. Prevent is part of the Government's counter-terrorism strategy CONTEST and aims to safeguard and provide support to divert vulnerable individuals at risk from being radicalised or groomed into supporting terrorist activity, before any crimes are committed. Radicalisation is comparable to other forms of exploitation, such as grooming and Child Sexual Exploitation. It is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Radicalisation is process rather than an event, and there is no single profile or pathway by which someone can be drawn into terrorism.
25. There are instead a range of contributing factors including, peer pressure, bullying, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances which can make people more vulnerable. Vulnerable individuals are often targeted and influenced by radicalisers either directly or increasingly in online chat rooms or through social media. The Counter-Terrorism and Security Act (2015) places a specific legal duty on specified authorities, including local authorities and health providers in the exercise of their functions, to have due regard to the need to prevent people being drawn into terrorism.
26. Channel is a confidential, voluntary, multi-agency safeguarding process designed to support vulnerable children and adults who may be at risk of being radicalised and drawn into terrorist activity.
27. It is an early intervention service which has been mandated in every local authority in England and Wales. Channel addresses all types of radicalisation including the extreme. Referrals in Berkshire are to be made to: Preventreferrals@thamesvalley.pnn.police.uk
28. 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

Reporting Concerns

- Any employee, governor or volunteer who becomes aware that an adult is or is at risk of, being abused or radicalised must raise the matter immediately with the DSL, Emma Kennett, or in her absence a member of the safeguarding team (safeguarding@maryhare.org.uk)
- MyConcern is the reporting system for both pupil concerns and staff concerns or allegations. There are different portals to use within MyConcern to register concerns.
- If a young adult 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.
 - Complete MyConcern/ Confide which will ask for details such as time, date, location, details of concern and actions taken. If urgent, please also inform the DSL by phone or in person. Aside from these people, do not disclose the information to anyone else.
 - When recording a MyConcern/ Confide record the actual words spoken by the person wherever possible and describe observations on their behaviour e.g. 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 young adult.
- Support will be offered throughout the process in whatever way meets the needs of the young adult.
- Working in partnership with young adults is important and we recognize the need for them to be involved in their own decisions around their safety and welfare. The young adult will be informed that advice is being sought or that a referral is being made. Where possible their wishes will be listened to 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 regard to making a referral or informing others who advocate on their behalf such as parents or carers.
- 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.
38. None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.
39. 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 through referral to Adult Social Care.
40. Where safeguarding concerns meet the criteria under Section 42 of the Care Act 2014, the Local Authority may undertake, or cause to be undertaken, a safeguarding enquiry to determine what action is required to protect the adult from abuse or neglect.
41. 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 period of school closure.
42. **If the young adult requires immediate protection from harm, contact the emergency services.**

Allegations against staff

43. 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.
44. In addition to informing the West Berkshire LADO, West Berkshire Adult Safeguarding, Social Care and or the Police will be consulted.

Safe Recruitment & Selection

45. Mary Hare is committed to safe employment and safe recruitment practices, that reduce the risk of harm to adults with care and support needs from people unsuitable to work with them.
46. 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.
47. 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

48. 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).
49. 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.

50. For all employees who are working or volunteering with young adults 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 Adults.
 - Recognise an adult 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 Safeguarding Adults Policy.
51. Key staff, including the DSL and those who have responsibility for young adults, such as Leaders in Residential Care and Head of KS5, will undertake available local training such as the Adult Safeguarding Level 1.
52. Safeguarding training will include awareness of equality, diversity and inclusion, unconscious bias, discriminatory abuse, hate incidents and barriers that may prevent adults from reporting concerns.

Confidentiality and Information Sharing

53. 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.
54. However, information should be shared with the Local Authority if an adult is deemed to be at risk of harm or they pose a risk of harm to another. A duty of confidence arises when sensitive personal information is obtained and/or recorded in circumstances where it is reasonable for the subject of the information to expect that the information will be held in confidence.
55. Adults at risk provide sensitive information and have a right to expect that the information that they directly provide, and information obtained from others will be treated respectfully and that their privacy will be maintained.
56. The challenges of working within the boundaries of confidentiality should not impede taking appropriate action. Whenever possible, informed consent to the sharing of information should be obtained. However:
- Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent.
57. The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. The law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality for example, where a serious crime may be prevented.
58. Whether information is shared with or without the adult at risk's consent, the information sharing process should abide by the principles of the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).
59. In those instances where the person lacks the mental capacity to give informed consent, staff should always bear in mind the requirements of the **Mental Capacity Act 2005**, and whether sharing it will be in the person's best interest.

60. The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) should not be a barrier to sharing information. It provides a framework to ensure that personal information about living persons is shared appropriately.

61. All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR).

Policy Version Detail

Reviewed Date:	Version:	Details of change:
Autumn 2024	0.1	Complete re-write
Autumn 2025	0.2	- Key Principles – paragraph 9 redefined; paragraph 10 ‘Empowerment’ redefined - Types of Abuse: Domestic Abuse – paragraph 14 – redefined - Radicalisation to Terrorism – paragraph 16 ‘Prevent’ redefined and added paragraphs 17-19 - Confidentiality & Information Sharing – paragraph 44 redefined and added paragraphs 45-50
Autumn 2026	0.3	- Team contact details on p3 updated - Paragraph 6 added - New sections added ‘Legislation and Guidance’, ‘Mental Capacity’ and ‘Equality, Diversity and Anti-Discriminatory Practice’ - Paragraph 22 – reworded bullet point ‘Discriminatory abuse’ and a added one about ‘Mate Crime’ - Paragraphs 40 and 52 added