



THE BRITISH RACING SCHOOL

Safeguarding Policy

“Safeguarding is everyone’s responsibility”

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This Policy links to:

- **Health and Safety Policy**
- **Safeguarding Policy & Procedures**
- **Child Protection Policy & Procedures**
- **Equality & Diversity Policy**
- **Anti-Bullying Policy**
- **Keeping Children Safe in Education 2020**
- **Online Safety Policy and Procedures**

British Racing School Safeguarding Policy

1. Purpose and Aims

The purpose of the British Racing School's (BRS) Safeguarding Policy is to provide a robust and secure framework for the BRS in safeguarding and promoting the welfare of trainees who attend the BRS or in the workplace whilst on the BRS programme. The policy aims to ensure :

- all trainees are safe and protected from harm and able to achieve the Every Child Matters outcomes. (Be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being)
- it will help prevent impairment of trainee's mental and physical health or development.
- trainees and their parents/carers have confidence in the systems we have in place.
- other elements of provision and policies are in place to enable trainees to feel safe and adopt safe practices.
- staff, trainees, trustees, visitors, employers and parents are aware of expected behaviours and the BRS legal responsibilities to its trainees.
- staff are trained to the appropriate level, receive regular updates and are aware of procedures for reporting concerns.

2. Ethos

Safeguarding at the BRS is considered everyone's responsibility and as such the school aims to provide a safe environment for every trainee, where they have the opportunity to achieve their potential. The BRS recognises the importance attached to ensuring that all trainees and staff feel safe and that they will be listened to and that appropriate action will be taken when concerns are raised. This will be done by, where necessary, working with other agencies (**Appendix 1**) and by providing activities and opportunities throughout the curriculum that will help equip our trainees with the knowledge, skills and ambition they need to succeed in modern Britain and to compete in the global labour market. This will include materials and learning experiences that will encourage our trainees to develop essential life skills and protective behaviours.

The BRS adopts a trainee centred approach which understands the needs and views of individual young people and vulnerable adults.

In safeguarding and promoting the welfare and wellbeing of our trainees, the BRS will act in accordance with key statutory and non-statutory guidance:

- "Working Together to Safeguard Children" 2018
- "Keeping Children Safe in Education" 2020
- "What to do if you think a child is being abused" 2015
- "Information Sharing" 2018
- The Children Act 1989 and 2004
- The Local Authority Safeguarding Children Board Inter Agency Procedures
- The Health and Safety at Work Act 1974
- Management of Health and Safety at Work Act (amended 1994)
- The Human Rights Act 1998
- The Data Protection Act 2018 (GDPR)
- Equalities Act 2010

- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- The Education Act 2002 and 2011
- The Counter Terrorism Act 2015(Prevent Duty for England & Wales 2016)
- FGM Act 2003 Section 5B
- Suffolk Safeguarding Partnership (SSP) interagency safeguarding and child protection procedures.

3. Roles and Responsibilities

Specific responsibilities for safeguarding at BRS are as follows:

Board of Trustees:

- the Chairman of the Board is Martin Mitchell (and Julia Budd Chair Designate): They oversees all aspects of BRS business including Safeguarding.
- has a duty to ensure that the BRS meets its statutory responsibilities and that the school is a safe place to train.
- will ensure they facilitate a whole school approach to safeguarding as outlined in KCSIE 2020
- must oversee all policies and procedures relating to safeguarding.
- to ensure that there are effective safeguarding policies, procedures and Code of Conduct in place and that they are available to all staff and also publicly through the BRS website or other means.
- to appoint a Trustee with specific responsibility for safeguarding (**Steve Johnson**)
- to ensure safeguarding will be an agenda item for all trustee meetings.

Safeguarding Committee:

- consisting of 2 trustees (**Lydia Hislop and Steve Johnson**) the CEO (**Grant Harris**) and the Designated Safeguarding Leads/DSLs (**Lawrie Gillespie, Sarah Hayde-Salter & Carol Bramhill**)
- to oversee and monitor all aspects of safeguarding.
- to provide support and guidance for DSLs.
- to satisfy themselves that trainees are safe in all aspects of the training they receive.

Senior Management (SMT):

- **Grant Harris (CEO), Duncan Gregory (Operations Director) and Andrew Braithwaite (Finance Director).**
- to develop and ensure the implementation of a robust safeguarding policies and procedures
- to manage all aspects of safeguarding.
- to appoint a senior member of staff as the Designated Safeguarding Lead with suitable alternatives.
- To ensure DSLs are “given the additional time, funding, training, resources and appropriate supervision support they need to carry out the role effectively.

Designated Safeguarding Lead (DSL) and Alternatives:

- currently **Lawrie Gillespie** (Welfare Manager), **Sarah Hayde-Salter** (Workplace Support Manager)and **Carol Bramhill** (Operations Manager)

- to be trained to Level 3 Safeguarding.
- to ensure that the BRS complies with current legislation in relation to safeguarding.
- to help develop and implement all aspects of BRS Safeguarding policies and procedures
- to ensure the policies are reviewed as required, at least annually, and the procedures and implementation are updated and reviewed regularly.
- At least one DSL to be available at all times, for BRS staff to discuss any safeguarding concerns.
- to provide advice and support to other staff on trainee welfare and child protection matters.
- to be the first point of contact for any safeguarding issues or concerns and to ensure all staff are aware of procedures for reporting concerns.
- To liaise with the three safeguarding partners (Local Authority, chief officer of police and Clinical commissioning groups) and work with other outside agencies
- To liaise with the BRS school nurse
- To work closely with and support BHA Safeguarding team regarding safeguarding concerns in the wider industry and deliver training and awareness to jockeys, trainers and senior staff through courses held at BRS.
- To ensure Foundation Course trainees complete BHA Safeguarding modules.
- to keep detailed, accurate and secure written records of concerns and referrals.
- to cover issues of safeguarding, bullying and harassment, personal/cyber safety and welfare during foundation course induction.
- to ensure that all safeguarding issues raised are effectively dealt with in accordance with procedure and to ensure appropriate action is taken in a timely manner to safeguard and promote trainee's welfare
- to attend regular safeguarding team meetings and weekly Trainee Welfare meetings
- to attend government WRAP training- Workshop to Raise Awareness of Prevent.
- to cover Safeguarding Policy and Code of Conduct during new staff induction and ensure that all staff have access to and understand the BRS safeguarding policy and Code of Conduct.
- to arrange training for both new staff during induction and current staff at regular intervals throughout the year
- to ensure safeguarding is on the agenda of Monthly Operations Committee meetings
- to provide safeguarding report for all trustees meetings. These reports may also feature in the BRS Quality Improvement Plan (QIP).
- to liaise with SMT and keep them informed of issues especially ongoing enquiries under Section 47 of the Children Act 1989 (Local Authority investigations) and/or police investigations.
- to complete a Safeguarding report/summary annually which will feed into the BRS Self-Assessment Report (SAR). If Self-Assessment highlights any areas for improvement, these will be included in an action plan which will be monitored by the Named Trustee for Safeguarding to ensure improvements are implemented.

All Staff:

- trained to Level 1 Safeguarding as a minimum.
- to attend refresher training on a regular basis.
- to familiarise themselves with Good Practice Guidelines/ Code of Conduct and procedures for reporting concerns.
- staff are required to be familiar with "Keeping Children Safe in Education 2020 Part one & Annex A) and to sign register to say they have read it.

Workplace Instructors Specific:

- to cover safeguarding during enrolment of new apprentices in the workplace.

- to monitor safeguarding in the workplace through regular contact with apprentices and use of the Safeguarding/Training Reviews on Onefile.
- liaise with employers and safeguarding team when issues arise.
- report any concerns associated with Trainees and their workplaces directly to the BRS safeguarding team.

4. Giving Prominence to Safeguarding

It is important that Safeguarding is given prominence that anyone attending the BRS and parents and/or carers are aware of how we deliver this. This is done in a number of ways:

- Publicly by publishing this policy on the BRS website.
- Trainee handbook contains a section on Safeguarding.
- Induction of new courses and staff, covered by DSL
- Safeguarding Policy, code of conduct and most up to date version of Keeping Children Safe in Education which all staff are required to have read and signed to confirm they have read this.
- weekly welfare meetings
- Mid-course questionnaire contains specific questions on Safeguarding.
- Trainee Partnership meetings, Safeguarding covered as an agenda item.
- End of Course Questionnaire contains specific questions on safeguarding and referred to during the end of the course interview with CEO.
- Workplace instructors must ensure that all trainees are aware of what action to take in the case of a safeguarding issue.
- BRS Onefile system contains Safeguarding review which **must** be carried out for each trainee entering the workplace within 10 days of starting.
- Use of SMS messaging **BRSSAFE to 62277 which is free at point of use.**

5. Recognising Concerns, Signs and Indicators of Abuse

Safeguarding is not just about protecting trainees from deliberate harm. For the BRS it includes such things as trainee safety, bullying, racist abuse, harassment, on-line safety and radicalisation amongst others.

Witnessing of abuse is never easy and can have a damaging effect on those who witness it as well as the victim subjected to the actual abuse.

Abuse can take place anywhere, at any time, in any family, institution or community, it can also take place wholly online or technology may be used to facilitate offline abuse.

It is important not to take the stance of:

“IT WOULDN’T HAPPEN HERE”

Abuse can be difficult to recognise as trainee may behave differently or seem unhappy for a multitude of reasons, as they move through stages of their development or possible changes to family circumstances. However it is important to know the types of abuse and their indicators.

Definition

“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. They may be abused by an adult or adults or another child or children.”

Children includes everyone under the age of 18 but the BRS has a Duty of Care to all trainees regardless of age.

Types of Abuse

Emotional abuse is a persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to the person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally appropriate expectations being imposed on a person. These may include interactions that are beyond the person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the person participating in normal social interaction. It may involve serious bullying causing individuals frequently to feel frightened or in danger, or the exploitation or corruption of young people or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Key Factors

- Development delay.
- Abnormal attachment to parent/carer.
- Low self-esteem.
- Lack of confidence.
- Inappropriate emotional response.

Sexual abuse involves forcing a young person or vulnerable adult or enticing a young person/ vulnerable adult to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts (e.g. masturbation, kissing, rubbing and touching outside the clothing). They may include non-contact activities, such as involving young people/vulnerable adults in looking at, or in the production of pornographic materials or watching sexual activities, encouraging young people/vulnerable adults to behave in sexually inappropriate ways or grooming a child in preparation for abuse (Including via the internet). Sexual abuse is not solely perpetrated by males; women can also commit acts of sexual abuse as can other children. While the media often promote "stranger danger", between 80 and 90% of cases involve a known adult. The internet has increased risk of non-contact sexual abuse and trainees must be alert of these dangers when online.

Key Factors

- Aggression.
- Withdrawn.
- Self-harming, including eating disorders.
- Drawings of sexually explicit behaviours.
- Promiscuity/precociousness.
- Inappropriate sexualised conduct.
- Sexually explicit behaviour.
- Reluctance to remove clothing e.g. fitness.

Neglect is the persistent failure to meet a young person's/vulnerable adult's basic and/or psychological needs, likely result in the serious impairment of the individual's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a young person is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a young person/vulnerable adult from physical and emotional harm and danger, failure to

ensure adequate supervision including the use of inadequate caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

Key Factors

- Inadequate clothing for size or time of year/weather
- Underweight for age.
- Poor health.
- Emotionally needy.
- Persistently dirty with a body odour.
- Frequent absences.

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

Key Factors

- Bruising of various ages.
- Bite marks.
- Burns and scalds.
- Injuries in unusual areas or with well-defined edges.
- Old injuries or scars.
- Refusal to discuss injuries or inconsistent explanations.
- Talk of punishment which seems excessive.
- Reluctance to remove clothing e.g. fitness.
- Arms and legs kept covered.
- Parents/carers uninterested or undisturbed by an accident or injury.

The **Key Factors** are by no means an exhaustive list and the presence or one of more is not proof that abuse is actually taking place or has taken place.

Abuse and Young People and Vulnerable Adults with a Disability

Young people/vulnerable adults with a disability are at increased risk of abuse and those with multiple disabilities are at even more significant risk both of abuse and neglect. Parents of young people with a disability may experience multiple stresses. This group of young people/vulnerable adults may be particularly vulnerable to abuse for a number of reasons including:

- Having fewer social contacts than other young people.
- Receiving intimate personal care from a larger number of carers.
- Having an impaired capacity to challenge abuse.
- Having communication difficulties resulting in difficulties in telling people what is happening.
- Being reluctant to complain for fear of losing services.
- Being particularly vulnerable to bullying or intimidation.
- Being more vulnerable to abuse by peers than other young people.

6. Prevent Duty

Extremism and Radicalisation is another part of safeguarding children and young people. As with any other concern, the risk of harm is raised when young people are vulnerable and is often noticed when they change their behaviour, clothing, appearance or attitudes.

Extremism is defined as follows:

“Vocal or active opposition to fundamental British values” and includes “Calls for the death of British armed forces”

One aspect of Safeguarding young people from radicalisation is set out in “Promoting Fundamental British Values.” This guidance sets out British Values as:

- **Democracy**
- **The Rule of Law**
- **Individual Liberty**
- **Mutual Respect and Tolerance of those with different faiths and beliefs.**

Extremism takes many forms and all ideologies are included in this area of safeguarding e.g:

- Islamic Extremism
- Right-wing Extremism
- Left-wing Extremism
- Animal rights Extremism

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with other safeguarding risk staff must be alert to changes in trainee’s behaviour which could indicate they need help or protection. It is important that staff recognise indicators that could make a trainee vulnerable to radicalisation:

Key Factors

- **Identity:** e.g. Trainee may appear to be distanced from their cultural or religious heritage, feeling discomfort about their place in society, have low self-esteem, may have disassociated themselves from their peer group and become involved with a new and different group of friends or may change their appearance.
- **Personal Circumstances:** e.g. Events affecting the trainee’s country of origin may lead to a sense of grievance that could be triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations:** e.g. Trainee may have perceptions of injustice, a feeling of failure or a rejection of civic life.
- **Criminality:** e.g. Trainee could be, or have been, involved with criminal groups, imprisonment or experienced poor settlement in the past.
- **Special Educational Needs:** e.g. leaving to poor understanding of the consequences of their actions or the awareness of the motivation of others, lack of social interaction or a tendency to show empathy with others.

Other more critical risk factors could include:

- **Being in contact with extremist recruiters**
- **Accessing violent and extremist website especially through social networking**

- **Possessing violent or extremist literature**
- **Using extremist narratives to explain personal disadvantage**
- **Justifying the use of violence to solve issues**
- **Significant changes to appearance and/or behaviour**
- **Joining or seeking to join extremist organisations**

If any member of staff has a concern about a trainee they should adopt the following procedure:

NOTICE- identify concern

CHECK- Speak to the DSL or Alternate

SHARE- DSL will refer to the Multi Agency Safeguarding Hub who will in turn refer to the Suffolk Channel Panel

The BRS will raise awareness of the PREVENT duty amongst both trainees and staff through training and updates as necessary.

7. Specific Safeguarding Issues

Some members of our communities hold beliefs that may be common within certain cultures but which are at odds with the law in Britain and as such the BRS has a duty to report any such concerns to the appropriate authorities.

Mental Health

BRS places great importance on trainee's mental health and wellbeing. BRS recognises that mental health problems can be a sign that a trainee has suffered or is at risk of suffering abuse, neglect or exploitation. The school has taken steps that will help trainees with mental health issues get the help and support they need and these include:

- appointment of school nurse
- training for senior staff in Mental Health First Aid
- training for other staff in Mental Health Awareness
- clear procedures for reporting both mental health and safeguarding issues

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. An appropriate guide is in place to support 12 -17 year olds. The guide explains each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that Trainees going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware that any Trainee regularly absent from either the workplace or the BRS should be reported to the safeguarding team.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are characterised by children and young people receiving goods, favours or money in return for sexual and criminal activities. In all such exploitation the balance of power remains with the abuser(s) and can be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status and resources.

Both CSE and CCE can affect both males and females, in fact it is suggested that round a third of victims are male but warning signs are the same for all, e.g. appearing with unexplained gifts, poor sexual health, violent mood swings and poor anger management, inappropriate sexualised behaviour (especially around strangers).

both CSE and CCE can take many forms and a range of coercive techniques are used for grooming through the extreme violence.

If any staff member or trainee has any concerns regarding such abuse they must report it to DSL or Alternate who will involve the appropriate authorities or in an emergency dial 999/112.

Risk Factors

- Homelessness
- Those in care or care leavers(especially residential care)
- Those with learning difficulties
- Migrant children/ unaccompanied asylum-seeking young people
- History of or involvement in substance abuse
- Those disengaged from education
- Poor mental health

- Disrupted family life
- Domestic violence
- Parental drug/alcohol misuse
- History of physical or sexual abuse
- Those involved in gang culture

Warning Signs

- Appearing with unexplained, usually expensive, gifts. Eg jewellery, phones, money
- Frequently in the company of older people, particularly boyfriends or girlfriends
- Self-harm
- Secretive behaviour
- Low level crime
- Chronic tiredness association with risky adults inappropriate sexualised behaviour, especially around strangers
- Mood swings, poor anger control, changes in emotional well-being
- Poor sexual health
- Drug and /or alcohol misuse (often a method of increasing compliance)

These signs and factors alone may not show the exploitation has happened or is happening but a combination of some should lead to concerns.

If staff are concerned about anything mentioned above they must follow BRS safeguarding procedures and report it to DSLs

Serious Violence

The above listed Risk Factors and Warning Signs could also indicate that a young person has been approached by, or is involved with, individuals associated with criminal networks or gangs who may be involved in serious violent crime. If staff are concerned about this they must follow BRS safeguarding procedures and report it to DSLs

Exploitation and Online Safety

Children and young people can be exploited and suffer bullying through their use of modern technology such as the internet, mobile phones and social networking sites. Trainees could be groomed to share indecent images with others on the internet; the prevalence of **sexting** (see below) is a significant risk factor and Staff should be aware that these devices can be used to carry many forms of abuse and exploitation not purely sexual.

It is essential that BRS trainees are safeguarded from potentially harmful and inappropriate online material. This is reflected in the delivery of an Online Safety lecture soon after trainee's arrival at BRS and backed up by an appropriate filter on BRS IT system (monitored by Dolphin ICT) and BRS Online Safety Policy.

Communication with trainees by mobile phone or other electronic devices must only be done using BRS equipment or BRS official social networking pages. **Use of personal equipment or social media is strictly forbidden.**

Sexting

Sexting is a significant issue for older teenagers and involves the sharing of indecent images of themselves with others. It may be the intention for the image to be shared only with one person, but invariably these pictures or videos end up being shared across the internet. These images can be part of the early stages of grooming.

“Up to 60% of teenagers have been asked for sexual images of themselves” NSPCC/Childline 2013”

Although sexting is a widespread phenomenon, it is illegal to send, create or be in possession of indecent images or videos of people under 18 years old therefore if evidence of sexting comes to light the BRS will report its concerns to the appropriate authority. Trainees will also receive further guidance as part of induction process and curriculum.

County Lines

The term ‘county lines’ refers to a form of criminal exploitation and is when gangs and /or organised crime networks groom and exploit young people to transport and sell drugs but can also include money and weapons. Often these young people are made to travel across counties, and they use dedicated mobile phone lines to supply drug etc.

Children as young as 7 are being put in danger by criminals who take advantage of how innocent and inexperienced these young people are. They will

Many victims are recruited over social media, with offenders luring them with images of cash, designer clothing and luxury cars, but vulnerable girls and women are being targeted by men who create the impression of a romantic relationship before subjecting them to Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).

If any staff member or trainee has any concerns regarding such abuse they must report it to DSL or Alternate who will involve the appropriate authorities or **in an emergency dial 999/112.**

Domestic Abuse

“Any incident or pattern of incidents of controlling 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” HM Gove 2013.

Controlling Behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive Behaviour is: an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

Trainees may suffer both directly or indirectly if they live in households where there is domestic violence. Domestic violence is likely to have a detrimental effect on the health, development and wellbeing of a trainee and it will often be appropriate for such to be regarded as Children in Need under The Children Act 1989. If

there is evidence of domestic abuse the BRS will report is concerns to the appropriate authority and the police in order to help prevent further abuse taking place.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a trainee's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

It should also be recognised that 16 and 17 year olds could be living independently from their parents or carers for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the trainee's circumstances.

Honour Based Violence (HBV) including Forced Marriage & Female Genital Mutilation (FGM)

Forcing someone to marry is a criminal offence in England, Wales and Northern Ireland. The legislation is part of The Anti-Social Behaviour, Crime and Policing Act 2014.

The legislation criminalises the use of violence, threats, deception or any form of coercion for the purpose of forcing someone into marriage or leaving the UK with the intention of forcing that person to marry.

Honour based violence can be described as a collection of practises which are used to control behaviour within families or other social groups, to control perceived cultural and religious beliefs and/or honour. There is no specific offence of "honour based crime", but it encompasses various offences covered by existing legislation.

FGM is the non-medical, partial or total removal of the female external genitalia or other injury to the female genital organs. This procedure is typically carried out on young girls but can be carried out later in life. FGM is illegal in Britain since 1985 and in 2003 it became an offence to take children abroad to have the procedure carried out.

Since October 2015 every professional has a mandatory reporting duty to notify police when they discover that an act of FGM has been carried out on a girl under 18 years old. Unless they have a good reason not to, staff should still consider and discuss any such case with the DSL or deputies who will involve Children and Young Peoples Services as appropriate.

Risk Factors

- low level integration into UK society
- mother or sister who has undergone FGM
- girls who do not want to take part in evening PSHE (personal, social, health and economic) sessions
- visiting female elder from country of origin
- being taken on a long holiday to country of origin
- talk about a "special" procedure to become a woman

Peer on Peer Abuse

All staff should be aware that Trainees can abuse other Trainees (often referred to as Peer on Peer abuse). This may include, but not limited to:

- bullying (see BRS Anti-Bullying policy)
- physical abuse (as described on page 7)
- abuse in intimate personal relationships between peers.
- sexual violence (such as rape, assault by penetration and sexual assault, see KCSIE page 87)
- sexual harassment (such as sexual comments or innuendo, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of abuse).
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; As of April 2019 upskirting is a criminal offence.
- sexting (see below)
- initiation/Hazing type violence and could include activities such as harassment, abuse or humiliation used as a way of initiating a person into a group and could also include an online element

Any reports or concerns will be dealt with in accordance with BRS safeguarding procedures and the Peer on Peer Abuse policy.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the BRS and/or can occur between Trainees outside the BRS. All staff, but especially the designated safeguarding lead (and deputies) will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of trainees will consider whether wider environmental factors are present in a trainee's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that the BRS provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Bullying

Trainees may be bullied for a number of different reasons including the protected characteristics: age, disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation all of which are included in The Equality Act 2010.

At the BRS we believe that all trainees have a right to attend the school and learn in a safe environment, free from harm by adults in the school or other trainees and all reports of bullying will be dealt with in accordance with procedures in the BRS Anti Bullying policy.

Abuse and Young People and Vulnerable Adults with SEN and disabilities

Trainees with disabilities have exactly the same rights to be safe and protected from harm at the BRS and achieve the Every Child Matters outcomes as non-disabled trainees.

Trainees with a disability are at increased risk of abuse and those multiple disabilities are at even more significant risk both of abuse and neglect. Parents of young people with a disability may experience multiple stresses. This group of Young people/vulnerable adults may be particularly vulnerable to abuse for a number of reasons including:

- Having fewer social contacts than other young people.
- Receiving intimate personal care from a larger number of carers
- Having an impaired capacity to challenge abuse
- Having communication difficulties resulting in difficulties in telling people what is happening.
- Being reluctant to complain for fear of losing services.
- Being particularly vulnerable to bullying or intimidation.
- Being more vulnerable to abuse by peers than other young people.

It is not always easy to recognise when abuse has taken place or a situation that has taken place may develop to become abusive. Staff are not expected to be experts at recognising such situations, but do have a responsibility to act if they have concerns about the behaviour of an adult towards another young person or vulnerable adult. All staff has a duty to discuss any concerns they may have about the welfare of a young people/vulnerable adult with the Designated Safeguarding Lead(s) or appropriate senior member of staff as soon as possible.

Gambling

The anticipation and thrill of gambling creates a natural high that can quickly become addictive. The internet has made gambling more accessible, allowing more and more people to do it in privacy or at home. This has also led to an increased in young people gambling.

Problem gamblers are more likely to suffer from low self-esteem, stress, anxiety and depression. Gamblers are also more likely to end up in prison for crimes such as theft or fraud.

The BRS operates in an industry heavily associated with gambling however in no way does the BRS promote gambling. The BRS employs a sophisticated system (Open DNS) which prevents online gambling and if staff have concerns about a trainee, they should report them according to BRS safeguarding procedures. The safeguarding team will help refer those involved to specialist help.

The Young Gamers and Education Trust (YGAM): <https://www.ygam.org/> or 0203 837 4963

National Problem Gambling Clinic: gambling.cnwl@nhs.net or 020 7381772

Gam Care: www.gamcare.org.uk or 0808 8020113

Gamblers Anonymous: www.gamblersanonymous.org.uk

The above list of Current Safeguarding Issues is not exhaustive and as new or updated policy guidance or legislation comes to light, the BRS will review and update its policy as appropriate and in line with the Suffolk Safeguarding Partnership and Local Authority to ensure the BRS is a safe place in which to learn and work.

What to do if you have a concern about a trainee

Unfounded allegations of abuse do sometimes occur. However if a trainee indicates that they are being abused, or information is obtained which raises concern that a person is being abused, this should never be ignored but taken seriously and always acted upon.

There are a number of barriers that exist which prevent a young person or vulnerable adult from telling others about abuse, some of the main barriers are that they may:

- be scared because they have been threatened
- think they will be removed from the School
- believe that they are to blame, or they may feel guilty
- think it happens to others
- feel embarrassed
- not want their abuser to get in trouble
- have communication or learning difficulties
- not have the vocabulary to describe what has happened
- be afraid that they won't be believed
- think they have already disclosed the abuse e.g. by dropping hints
- have told someone before and weren't believed so what's the point in trying again

If a disclosure is made:

DO

- stay calm and listen carefully
- reassure the person that they were right to tell you
- inform the DSL(s) without delay
- take notes on what is said, not what you think has happened. Do not destroy any notes taken. They **must be signed, dated and state the time and your position** and attached to the form stated below.
- let them know that the information will be shared but only with those that need to know
- make a full written record of what has been said, heard and/or seen as soon as possible (form can be found on QF No.811 or from the DSL) This **must be signed, dated and state the time and your position.** (These will be filed separately from other records in a secure cabinet in the admin office and keys held by DSLs)

DO NOT

- panic
- allow shock and/or distaste to show
- investigate- you may jeopardise any future prosecution
- ask leading questions. Stick to WHO, WHEN, WHERE?
- speculate, make assumptions or include your opinion in any notes taken
- make negative comments about the alleged perpetrator
- promise confidentiality, explain who you will have to share information with
- ask the trainee to repeat the disclosure to another member of staff
- **do nothing**, expecting someone else to deal with it
- do not discuss the issue with anyone other than the appropriate member of staff (DSLs)
- **delay referral**

If any staff members have concerns about a trainee they should, as stated, raise these without delay with the DSL but it is important to remember that **ANY** staff member can refer their concerns directly to Children's

Services. If there is a risk of immediate serious harm to a trainee, a referral should be made to **Customer First on 0808 800 4005 or in an emergency call 999/112.**

If you are unsure what your next course of action should be, talk to the DSL and you can also seek advice from the **MASH Professional Consultation Line on 0345 6061499.**

“The MASH (Multi Agency Safeguarding Hub) is for you to discuss the most appropriate and effective way of providing or obtaining help and support for a child (or adult) you feel is at risk of abuse. This will include advice and guidance about making a referral where necessary.”

What to do if you have a concern about a member of staff

If you have a concern about a member of staff then this should be referred to the Chief Executive. Where concerns are about the Chief Executive this should be brought to the attention of the Chair of the Board of Trustees. They must then discuss the nature of the allegation with the Local Authority Designated Officer (LADO) in order for the appropriate actions to be taken.

Action to be taken by CEO/Chair:

- refer to the LADO immediately and follow up in writing within 48 hours.
- consider safeguarding arrangements of the trainee to ensure they are away from the alleged abuser.
- contact the parents/carers if advised to do so by the LADO
- consider the rights of the staff member for a fair and equal process of investigation.
- ensure that any disciplinary measures are followed including whether to suspend the staff member pending the outcome of any investigation.
- act on the decisions made in any strategy meeting or evaluation meeting.
- advise the DBS (Disclosure and Barring Service) whether a member of staff has been disciplined or dismissed as a result of an allegation being founded.

The above is a brief summary of actions please also see “BRS procedures for dealing with allegations against a staff member or contractor”.

Recruitment of staff

All job descriptions will state whether an enhanced DBS check is required for the position.

- **Selection.** For each role a detailed job description is created if an existing one is not available. All positions will be advertised appropriately and the advert will clearly state that applicants will be required to undergo a DBS check where appropriate, the Recruitment Manager will approve all adverts before publication. The selection of new staff will always be carried out by at least two members of staff one of which will have completed safer recruitment training. For positions which have regular contact with young people, those being interviewed should be asked specifically about their experience of dealing with young people and any concerns raised in their responses to such questions should be noted and taken into account in the selection of the successful candidate. .
- **References.** At least two references will be taken up for any candidate selected for a position, irrespective of whether the job requires a DBS check. References will usually be obtained by the Line Manager responsible for the position. The Recruitment Manager holds the template to be used when requesting details of referees from a prospective new employee and generic letter to be used when writing to a referee.

- **Initiation of DBS Check.** The Recruitment Manager will initiate the DBS check process for any new member of staff whose position requires a DBS check. DBS checks will also be initiated for any new trustee.
- **Section 128.** This will be carried out for all trustees and senior management.
- **Single Central Register of Recruitment.** The Recruitment Manager is responsible for maintaining the single central register of recruitment and vetting checks.

For further information refer to Safer Recruitment Policy.

Induction of New Staff

All new staff will undergo the standard induction process. Their identity will be checked during induction. All staff are subject to minimum 1 month probation but some appointments are liable to 3 or 6 month probation.

Induction of new staff consists of:

- Office call with the Chief Executive.
- Briefing from Operations Director. Given a copy of Staff Handbook to read and sign to confirm that the details contained within will be complied with.
- Briefing from Recruitment Manager to include confirmation of DBS check.
- Briefing with DSL to cover safeguarding and staff code of conduct. This will also include details of safeguarding training to be carried out and an introduction to the safeguarding team and their contact details.
- Given a copy of BRS Safeguarding Induction booklet to be read, completed and signed.
- Health and Safety induction from Health and Safety Advisor.
- Job specific briefings and learning.

Part time/occasional Staff

Part time/occasional staff are to go through the same induction process outlines above for new full time staff, with the exception that the office call with the Chief Executive may be undertaken by the Operations Director.

Training Staff

Training of staff is an essential component of the School's Safeguarding policy. The School is a member of SafeCIC and Suffolk School's Choice, organisations dedicated to child protection. They provide child protection training, risk assessments and child protection policies. Level 1 Safeguarding training will be provided for all staff and this will be undertaken at least every three years. The School's Welfare Adviser and Trustees also take this training, which can be either face to face or online. There will also be regular updates throughout the year delivered by the DSL or Alternate, as when required.

The DSL and Alternatives will undertake training to Level 3 standard and this training to be renewed every two years to update their awareness and understanding of Safeguarding issues. This is delivered through links with Suffolk Safeguarding Children's Board. They will also have completed Common Assessment Framework training for dealing with disclosure issues. They also have access to regular updates through Suffolk CPD, Suffolk Safeguarding Children Board and NSPCC CASPAR amongst others.

Workplace Specific

“All those who come into contact with children and families in their everyday work..., have a duty to safeguard and promote the welfare of children” HM government Department of Health.

It is important to remember that children refers to all those under 18 years of age.

Workplace abuse comes in many forms: violence, harassment, threatening or aggressive behaviour and bullying. These can have devastating results with serious physical or psychological damage being common occurrences. Not only can this lead to lost staff or at the very least our staff morale it can also lead to legal or financial implications if employees seek financial compensation for their grievances. It can also lead to loss of reputation as “word” gets round, often making it difficult to recruit staff.

So it can be seen that robust and effective safeguarding procedures can help all staff, not only young people. They can help maintain good staff morale leading to a happier workforce which in turn can lead to better staff retention.

BRS Role

BRS will play its part in Safeguarding in the workplace as follows:

- A Health and Safety Standards (HASS) check will be carried out on all yards prior to a trainee being placed there, this will be reviewed every 3 years.
- Trainees will receive lessons in Equality and Diversity, Personal Safety, E-Safety, Prevent Strategy during their time at BRS.
- Trainees will be given a copy of Trainee Workplace Handbook which includes a section on a safeguarding, advice on how to deal with safeguarding situations and a list of useful contact details. This will also include contact information for BRS mentor and safeguarding leads.
- Also included in this are details of BRS safeguarding **SMS** service which provides round the clock contact with DSLs and also information on a variety of help lines
- Parents/guardians will be encouraged to play an active role in their young person’s transition to the workplace. E.g. finding accommodation, local amenities etc.
- Trainee Safeguarding Review will be carried out by Workplace Instructors (WIs) within 10 days of trainee commencing employment. This will also take place if a trainee moves to another yard.
- BRS Mentor (currently Sarah Hayde-Salter) will also be available outside normal working hours.
- Training Review will be carried out at regular intervals as long as the trainee remains on the BRS programme.
- A random selection of these reviews will be checked by the safeguarding team at regular intervals and these checks recorded.
- WIs are required to report any concerns, no matter how serious, to one of the BRS safeguarding team.
- The BRS Safeguarding team will offer help and support where possible to both trainees and employers.
- The BRS will deal with all Safeguarding matters as per procedures laid down in the BRS Safeguarding Policy.
- The BRS safeguarding team will liaise closely with their counterparts at the BHA.

Employers Role

- Employers taking on a BRS trainee should have a safeguarding policy in place. Those who do not have one may use the template provided in the BRS handbook or request a copy of the full BRS Safeguarding Policy to use as a basis of their own. This policy is also available on the BRS website.
- This policy should apply to all staff, clients and sub-contractors.
- Employers must also abide by the BHA Safeguarding Policy and undertake BHA safeguarding training.
- Employers should also have in place a Code of Conduct, again they may refer to the code included in BRS Safeguarding Policy to use as a basis of their own.
- Employers must agree to the HASS check carried out by BRS.
- Employers must agree to the action plan (if any) after the HASS check.
- Employers are encouraged to contact BRS safeguarding team if they need help with safeguarding issues.
- It is recommended that employers consider how they will enable protection for young people using their computers or Wi-Fi.
- Suspected or disclosure of abuse involving a BRS trainee must be reported to one of the BRS Designated Safeguarding Leads whose details are available in the BRS handbook. **In an emergency call the police 999/112.**
- Employers should follow the procedures shown in the safeguarding template or in the BRS/BHA Safeguarding Policies.
- Guidance on specific issues may be obtained from one of the Designated Leads at the BRS.
- Allegations against a member of BRS staff should be reported to Grant Harris, the CEO of the school.
- Should the trainer offer accommodation they have a duty to ensure that it is safe, secure and habitable.
- Trainers should also ensure that trainees under the age of eighteen do not have to share with older staff members.

Appendix 1

A number of agencies assist the School in fulfilling safeguarding responsibilities. These are:

- **SafeCIC AND Suffolk School's Choice.** These organisations provide 'first line' general advice, guidance and training on safeguarding issues.
- **BHA:** Matt Mancini (Lead Safeguarding Officer) & Ashlee Byrne (Safeguarding Officer) e-mail safeguarding@britishhorseracing.com
- **Suffolk Safeguarding Partnership (SSP)**
 - e-mail safeguardingpartnership.suffolk.gov.uk
 - Telephone: **01473 2026539**
- **Racing Welfare:** racing welfare has a nationwide network of welfare officers and a 24 hour help line. The number is: **0800 6300443**.
- **Racing Chaplain, Simon Bailey** visits the School on a weekly basis and at other times when dealing with a specific welfare issue. His contact number is: **07840 902450**.
- **Suffolk Multi Agency Hub (MASH):** The Local Authority in Suffolk have established a MASH which brings together a team of multi-disciplinary professionals from partner agencies to deal with all safeguarding concerns. **This consolation line is not a point of referral** but will allow professionals who may be unclear on which course of action to take to access advice and to discuss the most appropriate and effecting way of obtaining help. The number is: **0345 6061499**.
- **Suffolk Children and Young People's Services:** where there is a serious concern relation to a safeguarding issue this should be referred to Customer First. The contact details are:
 - **Daytime: 0808 8004005**
 - **Out of hours/weekend: 0808 8004005**
- **Local Authority Designated Officer (LADO):** There is now one central telephone number for LADO enquiries and referrals. The contact details are:

0300 1232044 LADO@suffolk.gov.uk

There is also a referral form, which ensure that basic information is captured and LSCB ask that this form is used whenever possible and emailed direct to the address above. **(Appendix)**

IN THE CASE OF A SERIOUS ISSUE OR CONCERN THE POLICE SHOULD BE CONTACTED

Local Police: 01473 613500

Emergency: 999/112

Appendix 2

STAFF CODE OF CONDUCT

- Treat all the trainees and colleagues with equal dignity and respect.
- Put the welfare, success and achievement of each trainee first, before the winning or achieving of goals.
- Be polite and friendly but don't forge close personal relationships with trainees or have favourites.
- Avoid physical contact unless absolutely necessary e.g. Legging up, first aid or other emergencies.
- If contact is unavoidable, explain and discuss these actions with trainee first.
- Be an excellent role model for trainees, this includes not smoking, drinking alcohol or using abusive language in the company of trainees in any work related environment.
- Recognise that caution is required especially when dealing with sensitive moments e.g. when dealing with bullying, bereavement or abuse.
- Do not accept swearing, bullying or other inappropriate behaviours either from colleagues or members of the public when trainees are involved or in close proximity.
- Do not allow trainees to use inappropriate language unchallenged.
- Give constructive feedback rather than negative criticism.
- Never reduce a trainee to tears as a form of control.
- Never make sexually suggestive comments, even in fun.
- Never transport trainees in your own personal vehicle.
- If you need to transport a trainee in a BRS vehicle you must ensure that they are accompanied by at least one other trainee or staff member.
- Never administer medication unless specifically trained and approved by the person's parents to do so.
- Never contact a trainee on your own phone, all contact should be made using official BRS devices.
- Never make contact with a trainee through a private social networking account or have social networking 'friendships' with any trainee for the duration of any training scheme they are enrolled on.
- Always observe Health and Safety regulations.
- Always follow BRS ID and security procedures.
- Be aware of visitors seemingly having no business on the premises. **NO BADGE? ASK!**
- Be alert to members of the public/staff approaching, videoing or taking photographs of trainees especially if using their own equipment.
- Report any such behaviours, incidents or concerns to the DSL or Alternate without delay.
- If none of these are available seek help from a member of the Senior Management Team.
- If you consider any such behaviours to be dangerous or criminal you may call Social Services "Customer First" on **0808 8004005** or **if in an immediate danger call 999/112.**
- Never allow allegations made by a person to go unchallenged, unrecorded or not acted upon.

The list is not exhaustive. Some specific posts and activities may need more detailed guidance. If employees have any concerns about the appropriateness of any practice or action, they should contact the DSL or Alternate.



**THE BRITISH RACING SCHOOL SAFEGUARDING YOUNG PEOPLE POLICY STATEMENT AND
IMMEDIATE ACTION GUIDE**

(To be displayed in all ‘collective’ offices, hostel and yard)

Designated Safeguarding lead: Lawrie Gillespie

Designated Safeguarding Lead Alternative: Sarah Hayde-Salter and Carol Bramhill

The British Racing School recognises that all young people have a right to protection from abuse. We take our responsibilities to protect and safeguard the welfare of young people seriously.

We will:

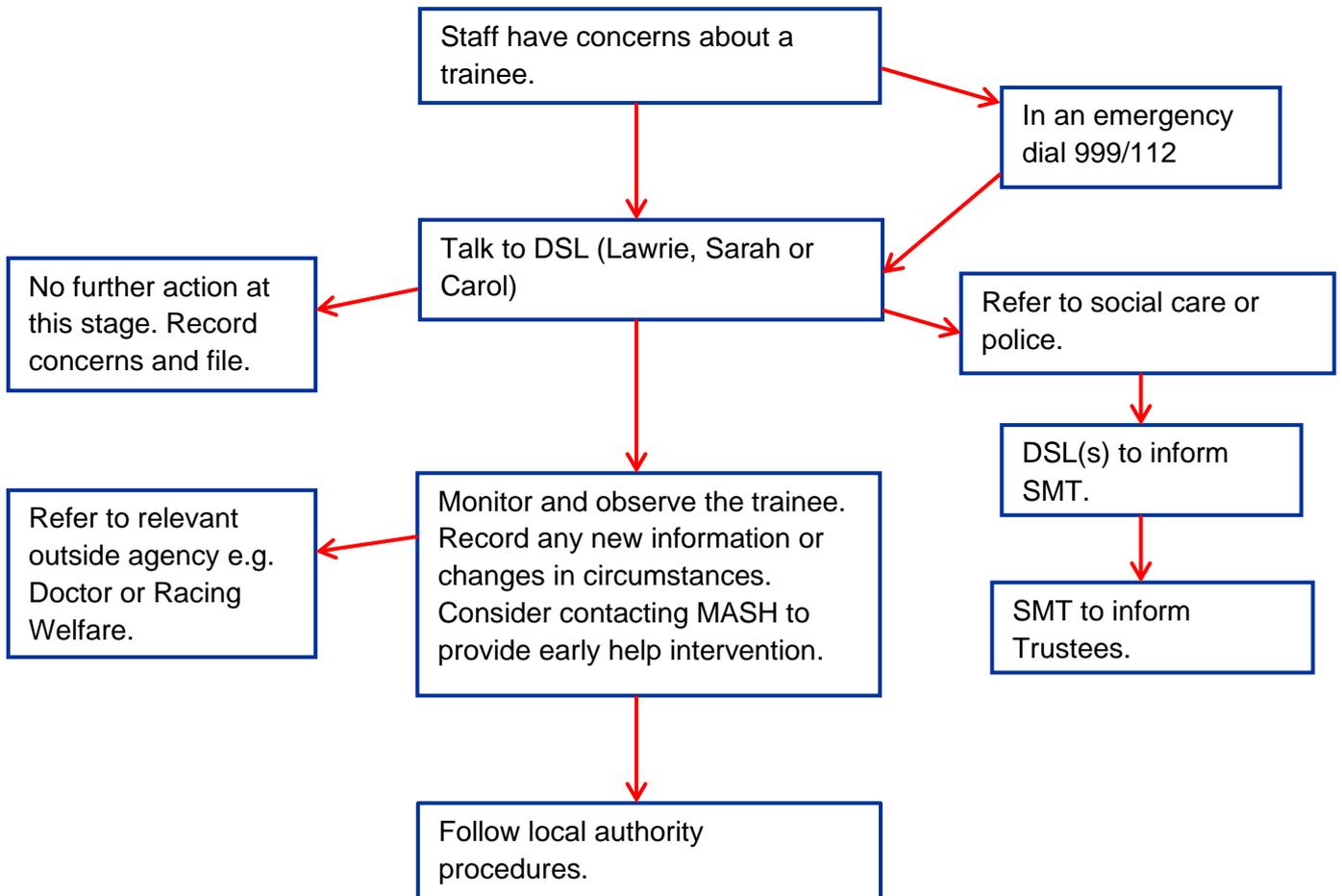
- Appoint a Trustee and a member of the Senior Management Team (SMT) with responsibility for safeguarding and nominate a Designated Safeguarding Lead and Alternate.
- Ensure we practise safer recruitment in checking suitability of all staff who have contact with young people.
- Raise awareness of Safeguarding issues with trainees and equip them with skills they need to stay safe.
- Respond swiftly and appropriately to all suspicious or allegations of abuse and provide parents and trainees with the opportunity to voice their concerns.
- Have a system for raising concerns about a young person’s welfare and possible abuse.
- Provide ongoing training for all staff on safeguarding and ensure they are aware of the School’s policy and procedures.

ISSUE	ACTION BY MEMBER OF STAFF INITIALLY AWARE OF ISSUE	ACTION BY DESIGNATED SAFEGUARDING LEAD
Complaint by/Concern of welfare of a trainee (because you have seen, been told, anonymous allegation, or disclosure)	<ol style="list-style-type: none"> 1. Keep calm, consider who else can hear, listen carefully, do not ask leading questions. Do not offer confidentiality. 2. Do not investigate. 3. Write down all that you are told and sign, date and time this. 4. Inform DSL or Alternative 5. Do not delay. In an emergency dial 999/112. 	<ol style="list-style-type: none"> 1. Inform Suffolk Social Services “Customer First”: 0808 800 4005 , 24 hr line: LADO@suffolk.gov.uk If of a serious nature contact the police. In an emergency dial 999/112
Allegation or Concern about the behaviour of a member of staff.	Actions as above but inform Chief Executive or Chair of Board of Trustees (if Chief Executive involved). In an emergency dial 999/112.	<p align="center">ACTION BY CEO OR CHAIR OF BOARD</p> <ol style="list-style-type: none"> 1. Inform Local Authority Designated Officer. 2. If of a serious nature contact the Police. In an emergency dial 999/112.

DATED: September 2020

SIGNED..... (Chief Executive)

Trainee Concern Flow Chart



At any point in the process, DSLs may seek advice from Safeguarding trustee.

DSLs may contact MASH consultation line for advice.

If relevant DSLs may inform BHA (See BHA flowchart)