



Equestrian Training

Equestrian Training Ltd Safeguarding and Prevent Policy

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Safeguarding Policy

Aim

The aim of Equestrian Training Ltd (ETL) is to provide and maintain an environment where young people, vulnerable adults and all learners and apprentices feel secure, safe and are encouraged to talk and are heard), regardless of:

- Gender
- Ethnicity
- Disability
- Sexuality

- religion

ETL is committed to ensuring learners and apprentices know that staff at any of our training locations can be approached if they are worried or have any concerns. We will provide opportunities throughout the learning programme for learners and apprentices to develop the skills they need to stay safe, healthy and recognise abuse and harmful behaviours.

ETL Intent

ETL will:

Ensure we practise safe recruitment in checking the suitability of staff, service providers and volunteers to work with learners through implementing Enhanced DBS checks and online searches (including social media).

- Train staff to identify and respond to potential indicators of abuse, neglect, harmful behaviours and safeguarding concerns among learners.
 - Ensure governors and all staff receive safeguarding training and are updated regularly so they have the knowledge and understanding to question, challenge and be assured that safe environments for learners are being created and sustained.
 - Work with safeguarding organisations and agencies to raise awareness of safeguarding issues.
 - Prohibit tutors from visiting learners at home even if the learner cannot visit a training site due to COVID.
 - Raise learner awareness of health, safety and safeguarding issues, equipping learners with the knowledge and skills needed to keep them safe both online and offline.
 - Follow and adhere to the relevant statutory guidance on safeguarding: 'Keeping Children Safe in Education, Department for Education, July 2021 (including additional guidance proposed for September 2022, and 'Working Together to Safeguard Children', Department for Education, December 2020).
 - Implement effective procedures for identifying and reporting cases, or suspected cases, of abuse and harmful behaviours.
 - Where necessary, work with safeguarding organisations and interagency frameworks to support learners who have been abused per their agreed protection plan.
 - By implementing and embedding our safeguarding policies and procedures within all learner processes, we shall establish a safe, stable, and secure environment where learners can learn, develop, and feel valued.
- Respond appropriately to allegations against staff, service users and other adults.

Responsibilities

Whilst it is expected that all staff of ETL will be committed to and accept personal responsibility for practical application of the policy, lead responsibility for its implementation will rest with the Director and Senior Management team responsible for Safeguarding Learner Protection and Welfare.

Our Designated Safeguarding Lead is Amy Hodgson, Director ahodgson@equestriantrainingltd.co.uk Tel 01768 785135. The number is monitored 365 days a year. We promote our Safeguarding contact details in our email footers and ID cards, which also identify external referral agencies to signpost apprentices, employers, staff, and family members.

We have additional staff to act as deputy DSO (Designated Safeguarding Officers) –

Rachel Parker, rparker@equestriantrainingltd.co.uk Tel: 07585 291818

Lara McCarron lmccarron@equestriantrainingltd.co.uk Tel: 07771 778101

Method

ETL will designate a Senior Person responsible for Safeguarding, Learner Protection and Welfare who has received appropriate Level 3 training and support for this role. The Designated Person will be responsible for recording an allegation or reported incident and will be responsible for contacting the local safeguarding board if necessary.

Every member of staff (including temporary, supply staff and volunteers) and appropriate partners will be briefed on the name and contact arrangements of the designated senior person responsible for Safeguarding Learner Protection and Welfare and their role. Currently, this person is Amy Hodgson, Director.

All staff shall undergo a formal briefing at an induction in responding to potential indicators of abuse, neglect, harmful behaviours, and safeguarding concerns among learners. They will complete the Level 2 Safeguarding qualification and the Level 2 Safeguarding Vulnerable Adults qualification within their first week of employment. The training will be renewed every three years or sooner if guidance/legislation is amended.

ETL will ensure that within the cohort, parents/guardians understand the responsibility placed on our company and its staff for Safeguarding Learner Protection and Welfare, setting out its obligations within the Learner PowerPoint and Induction programme and during progress reviews. ETL will notify the designated support services and interagency networks if there is an unexplained absence of more than two days of a learner who is on the protection register. Effective links between ETL and all relevant agencies will be maintained, and full co-operation will be afforded to all parties on enquiries regarding Safeguarding, Learner Protection and Welfare matters, including attendance at case conferences.

ETL have a Safeguarding Incident Report Form for those employed by ETL to complete and submit to the designated safeguarding officer. A learner, employer or family member can also complete our Safeguarding Concern Form to raise a concern, which will be investigated by one of the three designated safeguarding officers.

Written records shall be held securely, separate from the main learner administration file, on the Senior Management Team's OneDrive folder, which authorised personnel only can access and is password protected. All data will be held in line with the requirements of the GDPR Act 2018.

The Designated Safeguarding Lead, Amy Hodgson will establish contact with local Safeguarding Partners to determine their safeguarding 'alert' procedure and point of contact and record this information. The Company shall follow standard procedures where an allegation is made against any person, service provider or member of staff.

Definition

A young person is defined as a person/s under the age of 18 (The Children Act 2004). A vulnerable adult is a person over the age of 18 whose ability to protect themselves from violence, abuse or neglect is significantly impaired through physical or mental disability or illness, through old age or otherwise.

- Child Protection – Scope of Procedure Definition – a child or young person under the age of 18

Concerns re Young People & Vulnerable Adults :

What is or may be happening to a child or young person in an organisation. What is or may be happening outside that organisation (for instance, in their own family).

- Concerns may be about the behaviour of: A member of staff; A service provider; A peer/family member. The actions or inactions taken/not taken regarding the risk to a child or young person. Any member of staff receiving such information in all circumstances must respond under the following procedure – **DO NOT INVESTIGATE ANY CASE YOURSELF**

Immediate action to take if, as an employee of ETL you observe abuse taking place within the employer training network or training programme.

- Do all you can to stop the abuse immediately without putting yourself, the child, or the young person at undue risk.
- Inform the perpetrator of your concerns and advise them to stop and ask them to move themselves to an area where there is no contact with children and young persons. Advise them that you will immediately be informing the Senior Person on-site. If the perpetrator fails to desist – call for assistance. If the perpetrator does cease – stay with the child or young person until you can transfer them to the care of another responsible adult. Inform the Senior Person on site of what you have seen.
- Write notes on what you have seen, who did what, what was said and what you did, including the date, time and location, name of the perpetrator, name of the child or young person, sign, and date your notes. Report the incident immediately to your Safeguarding Contact, responsible for Safeguarding Learner Protection and Welfare. The Senior Person will, after discussion, decide whether the concerns should be referred to social services following the local child/safeguarding protection 'alert' procedure. The Senior Person will inform all parties within the employer organisation of action taken.

Immediate action to take if, as an employee of ETL you receive an allegation of harm to a child or young person taking place within the employer training network or training programme.

- If you are in direct contact with the person raising the concern, for instance, through a telephone call or discussion: Do not promise confidentiality. Explain what will happen next and assure them that you will only tell those you have to tell to try and get the matter dealt with as soon as possible.
- Avoid asking leading questions. Ask only what you need to know. Details of the allegation. – Name, DOB and address of the child or young person.
- Think about the immediate risk to the child or young person and what can be done to minimise the immediate risks. – Take notes of what has been said. – Don't at this stage tell the person who is the subject of an allegation what you have been told.
- Report the incident immediately to your Safeguarding Contact, informing the Senior Person responsible for Safeguarding Learner Protection and Welfare. After discussion, the Senior Person will decide whether the concerns should be referred to social services following the local child/safeguarding protection 'alert' procedure. The Senior Person will inform all parties within the employer organisation of action taken.

If you are not in direct contact with the person raising the concern, for instance, if you have received a letter or email:

- Retain any written records, including emails and letters. Don't at this stage tell the person who is the subject of an allegation what you have been told.
- Report the incident immediately to your Safeguarding Contact, informing the Senior Person responsible for Safeguarding Learner Protection and Welfare. After discussion, the Senior Person will decide whether the concerns should be referred to social services following the local child/safeguarding protection 'alert' procedure. The Senior Person will inform all parties within the employer organisation of action taken.

Allegations about an employee of ETL (or related partner such as sub-contractor or co-worker).

Any member of staff receiving such information in all circumstances must respond per the following procedure – DO NOT INVESTIGATE ANY CASE YOURSELF.

- Immediate action to take if you receive an allegation about an employee of ET (or related partner) Report the incident immediately to the Senior Person responsible for Safeguarding Learner Protection and Welfare. The Senior Person will liaise with the Director to coordinate decisions and any actions to be taken, including any referral to the child/independent safeguarding protection authority. Actions will be implemented by invoking the standard procedure.
- Allegations against staff meet the latest guidelines which talk about low level concerns and linking to the staff code of conduct, safeguarding policies and recording and sharing information with relevant parties. Low level concerns were revised to align against 'what to do in the event of safeguarding concerns about another member of staff.

Safeguarding Vulnerable Adults –

Scope of Procedure Definition – someone over the age of 18 years who:

- Is or may need community care services by reason of mental or other disability, age, or illness Is or may need additional support through learning difficulties.
- Is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation.

Concerns:

- Domestic Abuse.
- Physical abuse.
- Sexual abuse.
- Psychological abuse.
- Financial or material abuse.
- Neglect or acts of omission.
- Discriminatory abuse.

Concerns may be about the behaviour of:

- A member of staff.
- A provider of a service.
- A peer/family member

The principles for staff in identifying and responding to incidents of concern relating to adults are the same as those for children and young persons. In most cases, the same process and guidance in the sections will need to be followed.

Commitment

In order to demonstrate our commitment to safeguarding and child protection we will:

- Provide a safe environment for children and vulnerable adults to learn in.
- Take appropriate action including referrals to see that such children and vulnerable adults are kept safe, both at home and at Equestrian Training Ltd.
- Ensure that learners, staff (including freelance), visitors, volunteers, and employers feel safe.
- Implement safeguarding measures that exceed minimum DBS (Disclosure & Barring Service) compliance including the safe recruitment of staff.
- Appoint a Designated Safeguarding Lead (DSL) who will perform the required duties of Keeping Children Safe in Education, Department for Education July 2021 (Including additional guidance proposed for September 2022 and 'Working Together to Safeguard Children', Department for Education December 2020) with the support of identified deputies.
- Ensure that safeguarding is prioritised and that safe working practices are in place in all settings (including off site venues).
- Maintain a safe environment for all Equestrian Training Ltd stakeholders.
- Ensure all staff adhere to the E-safety policy regarding the use of computing equipment, the internet and all forms of electronic communication, including email, mobile phones, websites, social media sites and related learning technologies.
- Ensure apprentices receive guidance and training to help them stay safe online.
- Work with external agencies and professionals to safeguard stakeholders.
- Ensure risk assessments are in place and action as appropriate.
- Have procedures in place to safeguard all stakeholders including being able to respond effectively to incidents.
- Minimise the occurrence of accidents and incidents.
- Ensure a high quality of safeguarding principles and practices in our provider network where Equestrian Training Ltd learners are taught.
- Prevent learners and staff from being drawn into Radicalisation and Extremism. Maintain a line management framework through which staff are able to raise issue in relation to safeguarding and child protection in an appropriate, accessible and receptive environment

All company representatives (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.

Good practice should be promoted by being an excellent role model, contributing to discussions about safeguarding and positively involving people in developing safe practices.

This Safeguarding Policy will be implemented via a range of policies and procedures within the organisation. These include:

- Grievance and disciplinary procedures
- Appeals procedure
- Health and Safety policy
- Equality and Diversity policy
- Apprentice, employer and assessor induction
- Apprentice, employer and assessor training

Covid19 & Safeguarding

In England all legal restrictions have been lifted as part of the government's 'Living with Covid Plan for England' introduced in February 2022. The government is asking individuals to practice specific safe and responsible behaviour. From 22 February guidance still recommends that those individuals who test positive stay at home and avoid contact with others for at least 5 full days, and face coverings are still strongly encouraged. From 1 April employers will no longer have to consider Covid as a separate risk when working out how to keep employees safe.

Going forward ETL has several key priorities:

- To promote positive mental health and wellbeing for all learners and staff and ensure they have appropriate support in place
- To judge the most effective balance between different models of learning, and retain the capacity to deliver high quality education
- To maintain our strong focus on health and safety
- To review regularly our risk assessments
- To continue to follow government and other agency guidelines

We continue to provide clear policies, procedures and reporting arrangements, that protect our learners and workforce teams to help them understand how to stay safe at work and in their personal lives. At ET we link our Safeguarding and Prevent policies and procedures to:

- Health and safety-adherence to legislation and statutory requirements
- Health, wellbeing and welfare policy and procedures
- Covid-19 response policy and procedures
- Equality, diversity and inclusion (E,D&I)
- Fundamental British values (FBV), linked to your business, learning and working communities, underpinning safeguarding, Prevent, E, D&I and FBV
- Leadership adherence to the Single Equality Action Plan legislative requirements taken from the E&D Act of 2010 updated 2015 information.

To inform best practice at ETL we remain well informed of legislative requirements and guidance:

- <https://www.gov.uk/government/consultations/keeping-children-safe-in-education-proposed-revisions-2022>
- [Keeping children safe in education - schools and colleges - proposed revisions 2022 - Department for Education - Citizen Space](#)
- https://consult.education.gov.uk/safeguarding-in-schools-team/kcsie-proposed-revisions-2022/supporting_documents/KCSIE%202022%20consultation%20questionnaire.pdf

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1056992/FE_COVID_operational_guidance_Feb_2022.pdf
- **DfE**
- <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- **DfE**
- <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- **DfE Working Together to Safeguard Children**
- <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **Ofsted 2021 Review of Sexual Abuse in Schools and Colleges**
- <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>
- **Adherence to and embedding the Prevent guidance duty**
- [Prevent duty guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance)

Suicidal Disclosure

All employees of ETL will be required to complete the non-regulated Mental Health Awareness course within two weeks of their start date. They will have a robust understanding of suicide, suicide prevention, early intervention, and suicide postvention by completing the course. We will also have a qualified Mental Health First Aider at any given time to support our team in dealing with mental health concerns and learner suicidal disclosures. Our current first aiders are: Lara McCarron, lmccarron@equestriantrainingltd and Emily Massey emassey@equestriantrainingltd.co.uk

Based on their needs, all staff will be offered refresher opportunities after their first-course attendance on an annual basis to help maintain a commitment towards the policy. Training will contain comprehensive health and wellness information, including emotional, behavioural, and social skills development. The courses are CPD certified. Staff are taught not to make promises of confidence when they are concerned about a peer or significant other concerning suicide (or self-harm).

All staff are committed to and are responsible for safeguarding the health and safety of learners and colleagues. All staff are expected to exercise sound professional judgment, err on the side of caution and demonstrate extreme sensitivity throughout any crisis situation.

Any staff member who is made initially aware of any threat or witnesses any attempt towards suicide or self-harm that is written, drawn, spoken or threatened, will immediately notify the person responsible for Safeguarding (Amy Hodgson). Any threat in any form must be treated as real and dealt with immediately. No suicidal person should be left alone, nor confidences promised. In cases of a life-threatening situation, a person's confidentiality will be waived.

Suicide Crisis Response Procedures

Threat Definition – A suicide threat is a verbal or non-verbal communication that the individual intends to harm themselves with the intention to die but has not acted on the behaviour. The staff member who learns of the threat will locate the individual and arrange for or provide constant supervision until professional help is available. If the staff member has received their training and is a Mental Health First Aider, they may use these skills to support the person and keep them 'safe for now'. If the person at risk is an employee, learner or visitor, the Designated Safeguarding Officer will contact the person's emergency contact, for example, partner, parent, carer, other.

Suicidal Act or Attempt Definition – Suicidal act (also referred to as suicide attempt) – a potentially self-injurious behaviour for which there is evidence that the person probably intended to kill themselves; a suicidal act may result in death, injuries, or no injuries. The first staff member on the scene must call for help from another staff member, locate the individual where possible (if over the telephone), and contact emergency services 999. The crisis situation must then be reported to the DSO. Staff members should move (verbally, not physically) all other persons out of the immediate area and arrange appropriate supervision if needed. Others should not be allowed to observe the scene.

Post Intervention

The DSO will promptly follow up with any staff who might have witnessed the attempt. Appropriate support and/or professional help will be sought if required. Should the staff member choose to decline immediate support, they will be monitored for signs of post-trauma and re-offered support as and when needed. Support may include but is not exclusive to: MHFA, therapy, increased supervision from the line manager, or other appropriate and reasonable intervention.

Media representatives should be referred to the Director as the spokesperson.

****A review of this policy must also be undertaken following any suicide attempt or completion. ****

Reporting For FGM

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. The FGM mandatory reporting duty is legal in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe that the action was necessary for the girl's physical or mental health or purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e., it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restrictions on disclosure that might otherwise apply. The duty is a personal duty that requires the individual professional who becomes aware of the case to report; the responsibility cannot be transferred. The only exception to this is that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for statements to be made by the close of the next working day unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g., a sibling) and considers that consultation with colleagues or other agencies is necessary before the report being made.

Suppose you think you are dealing with such a case. In that case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable and record any decisions made. It is important to remember that the safety of the girl is the priority.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler with the following information:

- Explain that you are making a report under the FGM mandatory reporting duty
- Your details: Name, contact details (work telephone number and email address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and email address), place of work
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

FGM is child abuse, and employers and professional regulators are expected to pay due regard to the seriousness of breaches of the duty. All delivery staff will complete a separate FGM Awareness CPD training within their first week of work.

Honour based violence includes:

“Honour” based abuse (HBA) or “Honour” based violence (HBV): ‘So-called honour-based violence is a crime or incident, which has or may have been committed to protect or defend the honour or the family and/or community.

“Honour” based killings: ‘Murders within the framework of collective family structures, in which predominantly women are mutilated, imprisoned, forced to commit suicide and killed for actual or perceived immoral behaviour, which is deemed to have breached the honour codes of a household or community, causing shame.’ (Iranian and Kurdish Women’s Rights Organisation)

Often HBA/HBV and forced marriage are seen as synonymous, but there are differences. “Honour” based violence and abuse, which may include emotional, psychological, sexual and physical abuse, is a reaction to what is perceived as immoral behaviour that brings shame/izzat/namous/sharaf on the family or community.

These ‘immoral behaviours’ include:

- running away, coming home late
- ideological differences between parents and children
- Westernisation
- refusing an arranged marriage
- relationships outside marriage
- relationships outside the approved group
- 'inappropriate' make-up or dress
- loss of virginity
- pregnancy
- homosexuality
- reporting/fleeing domestic abuse, coercive and controlling behaviour, forced marriage
- girls who 'allow themselves to be raped.'
- causing gossip.

Sometimes a rumour about a family member doing one or more of the above is enough to elicit an abusive reaction. Unlike domestic abuse, where it is typically one person abusing another, in cases of HBA and forced marriage, the perpetrators can be one or many, including:

- father and mother
- brother and sister.
- grandparents
- uncles, aunts, cousins
- community members
- bounty hunters/'hit men.'

Crimes committed may include:

- ABH or GBH
- threats to kill
- harassment and stalking
- sexual assault
- rape
- female genital mutilation
- forced to commit suicide
- Forced Marriage
- Murder
- False imprisonment or kidnap
- Domestic Servitude

For every crime committed, there are also numerous incidents of bullying, emotional and psychological abuse. Some victims have very restricted movements and are under constant supervision, having little contact with the outside world.

One crucial thing is that if there is a suggestion of HBA, then family, friends and neighbours must **NOT** be automatically involved in any safety planning. Usually, in domestic abuse cases, family, friends, and neighbours, once they know of the issues, will rally around to offer support and keep an eye out for problems like calling the police if a perpetrator turns up. Still, in HBA cases, it is often complicated to identify those that could condone or be coerced into accepting what is seen as a way of preserving the community's heritage or

culture. The victim will say whom they trust, but family members may well have split loyalties, so the safest course is to try to work outside the community.

Prevalence

- At least 12 murders in the name of honour occur each year in the UK, although past murders are being reviewed to see if they are linked to HBA.
- South Asian women in this country are three times more likely to commit suicide than their white counterparts.
- There are 17,000 reported incidents of HBA or forced marriage in the UK each year.

There is no religious basis to HBA and forced marriage; all religious faiths and communities widely condemn them.

Safeguarding children & young people in education from knife crime

Knife crime involves a sharp or bladed instrument and can include anything from a kitchen knife or piece of glass to a potato peeler or a knitting needle. Knife crime can range from the threat of violence, where someone is carrying a sharp or bladed instrument, to someone who receives an injury resulting from a sharp object or bladed instrument. There are many different criminal offences relating to knives and offensive weapons – crimes include:

- Carrying a knife in a public place without good reason
- Using any knife in a threatening way
- Carrying, buying, or selling any banned knife such as a stealth knife, baton, disguised knife, or zombie knife.
- Selling a knife of any kind to anyone under 18-years-old.

Anyone carrying a knife or a gun, even an imitation one, will be arrested and prosecuted. There is no excuse in UK legislation to say it was for protection or carrying it for someone else.

A change in the [Law](#) means that anyone aged 16-17 years old convicted of carrying a knife for a second time will automatically receive a detention and training order of at least four months.

Why do people carry knives?

Many of those who carry knives say initially they had them for their own protection. Evidence shows that those who carry knives for their own protection are more likely to become victims as a result, and the knife can be turned on them.

However, some experts argue that it is often a fear of gangs and crime that leads to young people carrying knives because they believe it will help keep them safe. Those weapons may then be used, which could make the number of violent incidents go up.

No single agency, including schools, can solve knife crime on its own. In March 2019, the government published **Safeguarding children and young people in education from knife crime**. This report summarises findings and recommendations from a research project carried out in 29 schools, colleges, and pupil referral units in London. Read the report at www.gov.uk/knife-crime-safeguarding-children-and-young-people-in-education

Findings have been condensed into recommendations that focus on areas of practice and policy for schools and ITP's and wider agencies individually, and together, that can be tightened to keep children and young people safer – these include:

- improving partnership working and strategic planning
- sharing and promoting good practice concerning exclusions and managed moves
- coordinating early help and prevention
- improving information-sharing
- teaching the curriculum and supporting children to achieve

Sexual Harassment and Sexual Violence

Sexual violence or sexual harassment can occur between 2 children or Vulnerable Adults of any sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The guidance defines the following terms: Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours.

It is important to recognise that abuse of children does not just involve adults; it can occur between children – 'child-on-child abuse' The DfE's 'Sexual violence and sexual harassment between children in schools and colleges' (Sept 2021) makes this clear. A summary of this Guidance has been issued to staff (August 2021).

When such instances occur, ETL, as an Independent Training Provider will refer to The Education and Training (Welfare of Children) Act 2021 (<https://www.legislation.gov.uk/ukpga/2021/16/contents/enacted>), the Ofsted February 2022 version of the inspection handbook [GOV.UK \(www.gov.uk\)](http://www.gov.uk) and work on the assumption that sexual harassment affects our learners, and take a whole-provider approach to addressing these issues, creating a culture where sexual harassment is not tolerated, and steps to support the victim and perpetrator are taken.

These steps include:

- A risk assessment to evaluate the risks posed by the perpetrator
- Emotional support for the victim
- Support for the perpetrator
- Steps to try and maintain confidentiality regarding the issue in ETL
- Liaison with outside agencies, as required
- Liaison with parents/carers, as required
- Consideration of day-to-day routines in the workplace or training centre, for example, whether the victim and perpetrator are in the same group or office.

Sexual violence includes - rape, assault by penetration and sexual assault intentionally touching another person in a way that is sexual.

Sexual harassment is defined in the guidance as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's and/or a vulnerable adult's dignity and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

While not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual “jokes” or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools, colleges, Independent Training Providers should be considering when any of this crosses a line into sexual violence it is important to talk to and consider the experience of the victim) and displaying
- pictures, photos, or drawings of a sexual nature, and:
- **Online sexual harassment.** This may be standalone or part of a broader pattern of sexual harassment and/or sexual violence. It may include:
 - Non-consensual sharing of sexual images and videos.
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation; coercion and threats; and
 - Upskirting*

* Upskirting 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. **It is now a criminal offence, and we will take police advice on any cases.**

Harmful Sexual Behaviour (Including Sexting) from young people does not always occur with the intent to harm others.

In the guidance, harmful sexual behaviour is defined as problematic, abusive, and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children or vulnerable adults can be considered harmful if one of the children or adults are much older, particularly if there is more than two years’ difference in age or if one of the children is pre-pubescent and the other is not. Children and/or vulnerable adults displaying harmful sexual behaviours have often experienced their own abuse and trauma.

There may be many reasons why a young person engages in sexually harmful behaviour. It may be just as distressing to the young person who instigates it and the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play to sexually touching another or sexual assault/abuse. This also includes sexting when someone sends or receives a sexually explicit text, image, or video. This includes sending ‘nude pics’, ‘rude pics’ or ‘nude selfies’. Pressuring someone into sending a nude picture may occur in any relationship and to anyone, whatever their age, gender, or sexual preference. However, once the image is taken and sent, the sender has lost control of the image, and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be committing a criminal offence.

The phrase “Youth produced sexual imagery” has been introduced and covers:

- A person under the age of 18 creating and sharing sexual images of themselves with a peer under the age of 18
- A person under the age of 18 sharing sexual imagery created by another person under the age of 18

- with a peer under the age of 18 or an adult
- A person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> (Published December 2020)

Children or Vulnerable Adults who experience sexual violence and sexual harassment will likely find it stressful and distressing. It is more likely that girls will be the victims of sexual violence and more likely that boys will perpetrate sexual harassment. However, it is recognised that sexual violence and harassment can be and is perpetrated by girls.

Children or vulnerable adults who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child perceived by their peers as LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Children or Vulnerable Adults with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Additional barriers can sometimes exist when recognising abuse in SEND children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers.

Therefore, any reports of abuse involving children or Vulnerable Adults with SEND will involve liaison with the Designated Safeguarding Lead (or deputy). For the best way to respond to these issues, staff should read the following advice:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Sexual Violence and Harassment Summary we will –

- never tolerate or normalise this behaviour and are very clear it is not an inevitable part of growing up.
- not tolerate or dismiss sexual violence or sexual harassment as “banter”, “just having a laugh”, or “boys being boys.”
- challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts.
- understand that all of the above can be driven by broader societal factors beyond ET and the workplace, such as everyday sexist stereotypes and everyday sexist language.
- A whole organisation approach that exercises zero-tolerance to such behaviour

Staff will follow the safeguarding procedures already in place for ETL – alerting a DSL or deputy to manage the incident.

Transitioning from School to an Apprenticeship

According to [Apprenticeship statistics for England](#), in the first two quarters of the 2020/21 academic year (August 2020 to January 2021), there were 161,900 apprenticeship starts. This was a drop of 18% from the same period in 2019/20, with around 36,700 fewer starts. The fall in apprenticeship starts in quarters 1 and 2 of 2020/21 can be partly attributed to the coronavirus pandemic, as during the outbreak, some businesses have had to close and will have stopped hiring.

Apprentices under the age of 19 and intermediate level apprenticeships had the largest proportional fall for the first two quarters of 2020/21, from the same period a year before. There were 38,800 starts by apprentices under 19 in the first two quarters of the 2020/21 academic year, 19,300 fewer starts than the same period a year previously. This was a 33% fall in starts for this age group. In comparison, starts for apprentices aged 19-24 fell by 20% and fell by 7% for those aged 25 and over

Over the same period, intermediate level apprenticeship starts fell by 36%, while advanced level starts fell by 21%. Higher level apprenticeship starts increased over this period with 12% more starts.

To ease the transition any organisation educating young people under the age of 18 has statutory responsibilities under current legislation such as Keeping Children Safe in Education 2021. Apprentices need to be safeguarded against the same range of risks and dangers as their peers in schools and colleges.

Due to their relative inexperience in the workplace apprentices may be particularly vulnerable to anxiety or struggle to cope with the transition.

Systems can help staff recognise this and offer suitable support to those who need it and at ET we have processes in place to protect our learners.

Under legislation, all parties involved in an apprenticeship have to take reasonable action to minimise risks to apprentices. This includes aspects of the apprentices experience, both in and outside of the workplace, as well as during any attendance at our training centre.

Our role to support the transition:

- Ensure that employers are aware of their safeguarding obligations, through guidance and training pre-placement, at induction, throughout the apprenticeship programme.
- Maintain open channels of communication with each employer. Apprentices may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people.
- Have clear procedures in place so that any concerns can immediately be brought to specialist attention.

Employers role to support the transition

- Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ.
- Ensure that any staff working with apprentices in a position of trust are appropriate for the role and do not present any danger or threat.
- If possible, identify a person to be allocated as a mentor to the apprentice/s.
- Be aware of who to report any concerns to at ETL.

With these processes, the safeguarding of apprentices leaving school and entering into an apprenticeship will be a smoother transition.

Summary

If an act of abuse or neglect of a child (under the age of 18) vulnerable adult is identified or suspected, then the ETL employee should:

- Ensure the person's immediate safety.
- Do not promise confidentiality or agree to keep something secret.
- Do not investigate yourself and avoid asking leading questions.
- Obtain the necessary information to make an informed referral.
- Advise the Senior Person within the employer organisation.
- Make and keep a record of the incident and actions taken.

Report the incident immediately to your Safeguarding Officer, who will inform the Safeguarding Lead responsible for Safeguarding Learner Protection and Welfare. After discussion, the Safeguarding Lead will decide whether the concerns should be referred to social services following the safeguarding protection 'alert' procedure. The Safeguarding Lead will inform all parties within the employer organisation of action taken.

Monitoring

This policy will be monitored and any concerns raised will be logged and recorded on ET's intranet.

Review

The policy has been approved by ETL's Senior Management Team. The policy will be reviewed on a half-yearly basis unless circumstances arise requiring the policy to be reviewed earlier.

Board Signatory:

Date Written:	12/02/2022	Author:	Amy Hodgson
Date Issued:	22/02/2022	Review Due:	February 2023
Version No:	6	Version Summary:	Sexual harassment and DFE Sept 2021 added. Education and Training (Welfare of Children) Act 2021. Transition from School to an apprenticeship. January 2021 KSCIE requirements and July 2021 updates



Equestrian Training

Equestrian Training Ltd Prevent Policy

Purpose

Equestrian Training (ETL) is committed to providing a secure environment for learners, where they feel safe and are kept safe. All staff at ETL recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not. In adhering to this policy and its procedures, staff and visitors will contribute to ETL's delivery of the outcomes to all learners, as set out in s10 (2) of the Children's Act 2004. This Preventing Extremism and Radicalisation Safeguarding Policy is one element within our overall arrangements to Safeguard and Promote the Welfare of all Learners in line with our statutory duties set out in the Education Act 2002 and the Counter-Terrorism and Security Act 2015 (<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>).

We will work with all external agencies, such as, CHANNEL to keep our learners safe and secure. Channel is a voluntary, confidential programme which operates throughout England and Wales to safeguard people identified as vulnerable to being drawn into terrorism. It is a multi-agency process, involving partners from the local authority, the police, education, health providers, and others.

Referring possible cases of early-stage radicalisation works in a similar way to safeguarding processes designed to protect people from gang activity, drugs, and domestic/physical/sexual abuse.

ETL's British Values & Challenging Radicalisation, Extremism and Terrorism (please refer to Appendix 1 for Definitions) and Safeguarding Policy also draws upon the guidance contained in DfE Guidance "Keeping Learners Safe in Education, 2021"; and specifically DCSF Resources "Learning Together to be Safe", "Prevent: Resources Guide", "Tackling Extremism in the UK", DfE's "Teaching Approaches that help Build Resilience to Extremism among Young People" and Peter Clarke's Report of July 2014 and include:

- the physical, mental health and emotional well-being of children.
- the protection of children from harm and neglect; the education, training, and recreation of children.
- the contribution made by them to society.
- and their social and economic well-being.

Policy statement

When operating this policy ETL uses the following accepted Governmental definition of extremism which is: 'Vocal or active opposition to fundamental British values, including



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democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'

Scope

In this policy, third party means any individual or organisation ET employees meet during the course of their work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, (whether permanent, fixed-term or temporary).

Radicalisation, extremism, and terrorism policy

This policy covers ETL employee responsibilities.

There is no place for extremist views of any kind in our organisation, whether from internal sources – learners, staff, or external sources - external agencies or individuals. Our learners see ETL as a safe place where they can explore controversial issues safely and where our staff encourage and facilitate this – we have a duty to ensure this happens.

At ETL we recognise that extremism and exposure to extremist materials and influences can lead to innocent individuals / groups being targeted, harmed and in extreme cases killed. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people.

Education is a powerful weapon against this; equipping young people with the knowledge, skills, and critical thinking, to challenge and debate in an informed way.

We are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times learners may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Any prejudice, discrimination, or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate dealt with in line with our Disciplinary Policy for learners and the Code of Behaviour for staff.

As part of wider safeguarding responsibilities ETL staff will be alert to:



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- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of ETL, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Training Advisors and Tutors reporting changes in behaviour and attitudes during training sessions.
- Training Advisors and Tutors reporting changes to attendance, punctuality, or personal circumstances.
- Employers reporting changes in behaviours and attitude, attendance, punctuality, performance at work and/or personal circumstances.
- Partners, local authority services, and police reports of issues affecting learners in other providers or settings
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or hate crime terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

Ethos and approach

We will all strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches learners may experience elsewhere may make it harder for them to challenge or question these radical influences, this guidance and support be delivered in sessions.

We will ensure that all our support and approaches will help our learners build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills. We will develop strategies and staff training to ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it.

Therefore, this approach will be embedded within the ethos of our company so that learners know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our approach to the spiritual, moral, social and cultural development of learners.

Goal/s

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution.



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We will achieve this by using an approach that includes:

- Open discussion and debate
- Work on anti-violence and a restorative approach to conflict resolution

We will also work with local partners, families, and communities in our efforts to ensure ETL understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our learner's experiences and horizons. We will help support learners who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a learner is being directly affected by extremist materials or influences, we will ensure that the learner is offered mentoring. Additionally, in such instances ETL will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

At ETL we will promote the values of democracy, the rule of law, individual liberty, mutual respect, and tolerance for those with different faiths and beliefs. We will teach and encourage learners to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our learners safe and prepare them for life in modern multi-cultural Britain and globally

Use of External Agencies and Speakers

We encourage the use of external agencies or speakers to enrich the experiences of our learners; however, we will positively vet those external agencies, individuals, or speakers who we engage to provide such learning opportunities or experiences for our learners.

- ETL staff will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:
- Any messages communicated to learners are consistent with the ethos of our organisation and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies
- Activities are matched to the needs of learners
- Activities are carefully evaluated by ETL staff to ensure that they are effective

We recognise, however, that the ethos of ETL is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this. Therefore, by delivering a broad and balanced learning programme, augmented by the use of external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help learners develop the critical thinking skills needed to engage in informed debate.



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Readiness for Life in Modern Britain (Fundamental British Values)

Our commitment is to:

- Enable learners to develop their self-knowledge, self-esteem and self-confidence.
- Enable learners to distinguish right from wrong and to respect the civil and criminal law of England
- Encourage learners to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of the Centre and to society more widely
- Enable learners to acquire a broad general knowledge of and respect for public institutions and services in England.
- Further tolerance and harmony between different cultural traditions by enabling learners to acquire an appreciation of and respect for their own and other cultures.
- Encourage respect for other people, and
- Encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

Examples of how we will achieve these are:

- Provide materials on the strengths, advantages and disadvantages of democracy, and how democracy and the law work in Britain, compared to other forms of government in other countries.
- Ensure all learners within ETL have a voice that is listened to and demonstrate how democracy works by actively promoting democratic processes.
- Use opportunities such as general or local elections to hold mock elections to promote fundamental British values and provide learners with the opportunity to learn how to argue and defend points of view.
- Consider the role of extra-curricular activity, including any run directly by learners, in promoting fundamental British values
- All Staff are required to tackle poor learner behaviour and are offered training in assertiveness and de-escalation to support this.

‘Whistle Blowing’

Where there are concerns of extremism or radicalisation learners and staff will be encouraged to make use of our internal systems to ‘Whistle Blow’ or raise any issue in confidence.

Staff can raise issues with a senior manager under our 'Whistle blowing' procedure.



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Record-keeping

Please refer to our Safeguarding Policy for the full procedural framework on our Safeguarding duties, including the named safeguarding officer, reporting and investigative procedures.

Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Who is responsible for the policy?

The senior management team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Director has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and Review

The impact of this Policy will be monitored through rigorous performance reporting to senior management team and the Director.

Board Signatory: *Amy Hodgson*

Date Written:	03/02/2022	Author:	Amy Hodgson
Date Issued:	04/02/2022	Review Due:	28/02/2023
Version No:	6	Version Summary:	Annual Review
Approved By:	Board of Governors	Date Approved:	03/02/2022



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Appendix 1

Definitions	
Extremism	Government's Counter Extremism Strategy, 2015: 'Extremism is the vocal or active opposition to our shared values. These include democracy and the rule of law, mutual respect and tolerance of other faiths and beliefs. We also consider calling for the death of our armed forces either in the UK or overseas to be extremism.'
Radicalisation	Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. (Revised Prevent Duty Guidance for England and Wales, issued on 12th March 2015 and revised on 16th July 2015, definition)