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# THE PONY CLUB: SAFEGUARDING POLICY

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This document contains The Pony Club Safeguarding Policy and all relevant policies and procedures.

Approved by The Pony Club Board of Trustees on: *May 2021*

To be reviewed: *May 2022*

## **Precis**

The Pony Club Safeguarding Policy outlines the responsibilities of Branches, Centres, volunteers, coaches and staff to care for children, young people and adults at risk or who are vulnerable. The document defines the escalation process and the support available to those within The Pony Club.

The Pony Club has additional policies, such as Complaints Resolution and Equality & Diversity, as well as Codes of Conduct which relate to and integrate with this Safeguarding Policy.

Safeguarding is everyone's responsibility. This Safeguarding Policy signposts a range of documents and provides guidance and key contacts to support those who may have concerns about a vulnerable child, young person or adult.

**Note:** This document is reviewed annually or when there are significant changes to legislation and/or statutory guidance.

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## Section 1: Safeguarding & Our Duty of Care

### 1.1 The Pony Club Duty of Care Commitment

Vision: To provide children and young people with the opportunity to develop a lifelong love of horses through fun, friendship, horsemanship and sport.

Commitment: The Pony Club believes that it is essential that children and young people are encouraged to take part in outdoor activities and sports as part of their development to adulthood. Their participation in sport must be in a secure, safe and fun environment and be protected from harm. The positive effects of involvement with horses can help develop self-esteem, teamwork and leadership. This can only take place if equestrian sport is effectively regulated and managed by well trained staff and Volunteers.

### 1.2 The Pony Club Purpose

The Pony Club exists:

- To promote and advance the education and understanding of the public and particularly children and young people, in all matters relating to horsemanship and the horse.
- To encourage the development of sportsmanship, unlocking potential by building resilience, confidence, teamwork and leadership skills.
- To support and develop the volunteering network to strengthen The Pony Club community and sustain lifelong engagement with equestrianism.

### 1.3 Safeguarding Policy Statement

The Pony Club has a statutory duty to protect children and safeguard their welfare. Participants in Pony Club activities are entitled to expect a safe and enjoyable environment. The Pony Club policies and procedures are consistent with the British Equestrian (BEF) Safeguarding Policies.

*"Everyone who comes into contact with children and families has a role to play. Children who need help and protection deserve high quality and effective support as soon as the need is identified." (Working together to safeguard children, 2020)*

The Pony Club is committed to ensure that:

- The welfare of children and young people is paramount, taking a child-centred approach.
- Reasonable and practical steps are taken to protect children from harm, discrimination or degrading treatment, and to respect their rights, wishes and feelings.
- High standards of behaviour and practice are maintained through compliance with Codes of Conduct produced for Members, Coaches, Officials/Volunteers, and Parents/Guardians.
- Concerns and allegations of child abuse or poor practice are taken seriously and responded to swiftly and appropriately.
- Employees and volunteers are carefully selected, informed of their responsibilities and provided with guidance and/or training in good practice and safeguarding procedures.

This policy applies to Pony Club Branches, Centres, staff, volunteers, Members and their parents/guardians affiliated to or taking part in activities run by The Pony Club. It also applies to all working and volunteer Coaches.

This document will be reviewed annually or where there are significant changes to legislation and/or statutory guidance.

### 1.4 Role of the British Equestrian (BEF)

Note the following abbreviations:

- MBs refers to BEF Member Bodies
- LSO refers to Lead Safeguarding Officer(s)
- SAT refers to Safeguarding Advisory Team
- CMG refers to Case Management Group

The role of the BEF is to:

- Provide a strategic overview and guidance for equestrian sport on safeguarding children and adults at risk and promote their welfare.
- Provide guidance on best practice in recruitment, training and supervision of Officials, Volunteers, staff, Coaches, Members and parents/guardians for all MBs.
- Provide access to approved child protection/safeguarding education and training to staff at BEF, its MBs and LSO.
- Respond to and support MBs with the management of allegations, concerns and complaints relating to child protection and welfare, initiating case management systems and processes as necessary, and liaising with the CMG as requested by MBs.
- Coordinate and update a central database for all concerns/cases shared by MBs via MyConcern.
- Give guidance on the implementation and management of appropriate disciplinary and appeals procedures in relation to child protection and welfare, including monitoring the outcomes of any such events as requested by MBs.
- Coordinate the BEF SAT and CMG groups.
- Ensure that all concerns are correctly reported and referred out in accordance with the BEF guidelines.
- Ensure that BEF procedures for recruitment of staff and volunteers are followed and all appropriate existing staff and volunteers have up to date disclosure checks (DBS, PVG or Access NI) if appropriate and applicable.
- Review and monitor the implementation of the policy and procedures on an annual basis.
- Ensure that all data collected by the BEF is kept securely in accordance with data protection legislation.

#### **1.5 Role of The Pony Club**

Safeguarding responsibilities can be divided into five key areas:

1. To ensure safeguarding standards are met and maintained.
2. To ensure strict adherence to and clear accountability for safeguarding policies and procedures, including whistle blowing, from grassroots to board level.
3. To report, manage and deal with concerns about children and adults at risk and their welfare.
4. To ensure appropriate confidentiality is maintained where possible.
5. To provide appropriate training and ensure all relevant skills and knowledge are kept up to date.

#### **1.6 Role of The Pony Club Safeguarding Team**

The Pony Club Safeguarding Team has primary responsibility for managing, reporting (if necessary and appropriate), and handling specific concerns about children and adults at risk; for adopting and promoting appropriate safeguarding procedures, training and best practice guidance; and for providing support for Branches, Centres and Officers as appropriate.

Specifically, their role is:

- To assist with creating a positive, child-centric environment within The Pony Club.
- To define The Pony Club's approach to safeguarding.
- To manage cases of child abuse and poor practice involving the Pony Club, including maintaining records.
- To manage referrals to statutory agencies (police, social care or Local Authority Designated Officer/LADO).
- To be the central point of contact for internal and external individuals and agencies.
- To represent the organisation at external meetings related to safeguarding.
- To maintain, review and disseminate policies, procedures and resources throughout the organisation in conjunction with the Board of Trustees and other relevant Officials.
- To provide advice and support to Branch/Centre Safeguarding Officers and other Officials and play a key role in their recruitment, selection and training.

- To ensure and promote adherence with safer recruitment practices, including the availability of simple and accessible disclosure checking systems and providing support where necessary.
- To advise on the organisation's training needs and the development of its training strategy in conjunction with the BEF and its MBs, and to provide training where appropriate.

### **1.7 Role of Branches/Centres**

The role of the Branch/Centre is:

- To ensure a positive, child-centric environment.
- To safeguard members and work collaboratively with them and their families when deciding how to support their needs.
- To implement The Pony Club's Safeguarding Policy and Procedures, including safer recruitment practices.
- To respond to and report concerns about Members' welfare, child abuse or poor practice (whether suspected or confirmed).
- To ensure confidentiality is maintained and information sharing is appropriate.
- To promote The Pony Club's best practice and Codes of Conduct.
- To ensure all relevant officials, volunteers, staff and coaches attend appropriate safeguarding training.

Poor practice or conduct which does not constitute a safeguarding concern should be reported to the District Commissioner, Area Representative, Centre Proprietor or Centre Coordinator as appropriate. They should address their concerns to the Rules and Compliance Committee (RCC). The Pony Club Safeguarding Team is not responsible for issues which do not constitute safeguarding concerns.

### **1.8 Role of Branch/Centre Safeguarding Officer**

The Branch/Centre Safeguarding Officer is charged with managing and reporting concerns about children and adults at risk, in line with Pony Club policies and procedures, and for implementing safeguarding procedures.

Branches and Centres are required to appoint a Safeguarding Officer, who may be the District Commissioner or Centre Proprietor, or another committee member or Centre employee/personnel. Prior knowledge and expertise are essential to carry out the role effectively. Appropriate training will be provided.

The role of the Branch/Centre Safeguarding Officer is:

- To work with the Branch/Centre to ensure a positive, child-centric environment.
- To assist the Branch/Centre to safeguard members.
- To assist with implementing, managing and monitoring The Pony Club's Safeguarding Policy and Procedures, including safer recruitment practices and reporting procedures.
- To be the first point of contact for officials, volunteers, staff, coaches, Members and parents/guardians for safeguarding concerns (whether suspected or confirmed).
- To be the contact for The Pony Club Safeguarding Team.
- To maintain case records as necessary.
- To maintain confidentiality and share information appropriately.
- To promote The Pony Club's best practice and Codes of Conduct.
- To ensure all relevant officials, volunteers, staff and coaches attend appropriate safeguarding training.

### **1.9 Who do I contact?**

If you have any queries regarding Safeguarding, contact The Pony Club Safeguarding Team:

**Development Officer:**

Stefanie Brazier

**Email:** [stefanie.brazier@pcuk.org](mailto:stefanie.brazier@pcuk.org)

**Tel:** 02476 698323

**Lead Safeguarding Officer:**

Christine Gould

**Email:** [safeguarding@pcuk.org](mailto:safeguarding@pcuk.org)

**Tel:** 07833 523626

## Section 2: Dealing with Concerns & Allegations

Safeguarding is everyone's responsibility. Everyone has a duty to action any concerns they have or that are raised with them. **No action is not an option.** It is essential to deal with any concerns in a sensitive and appropriate way. Concerns should be taken seriously and must be addressed promptly. Confidentiality must be maintained at all times and information only passed to those who need to know.

*"Safeguarding and promoting the welfare of children is defined as:*

- *Protecting children from maltreatment*
- *Preventing impairment of children's mental and physical health or development*
- *Ensuring children grow up in circumstances consistent with the provision of safe and effective care*
- *Taking action to enable all children to have the best outcomes."*

*(Working Together to Safeguard Children, 2020).*

The following sections outline Four Safeguarding R's for dealing with any concerns or allegations:

Recognising Abuse	Responding	Reporting	Recording
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It is not the place of anyone within The Pony Club to ascertain whether abuse is taking place or to find evidence to support this. Instead, concerns should be reported to the appropriate Officer, i.e. the Branch/Centre Safeguarding Officer, The Pony Club Safeguarding Team and/or the appropriate authorities.

Where a concern is raised about poor practice and doesn't constitute a safeguarding concern, then this should be reported to either the District Commissioner, Area Representative, Centre Proprietor or Centre Coordinator for them to action as appropriate via the Rules and Compliance Committee (RCC). The Pony Club Safeguarding Team are not responsible for issues which do not constitute safeguarding concerns.

There are four levels of reporting with safeguarding concerns or allegations raised within The Pony Club. These include the person initially reporting the concern/allegation (referred to as Concerned Party), the Branch/Centre Safeguarding Officer, The Pony Club Safeguarding Team and referrals made to the Police, Social Care or LADO where necessary (referred to as Statutory Agencies).

**If you feel a child is in immediate danger you should call the police.**

### 2.1 Recognising Signs of Abuse

#### Child and Adult [at Risk] Abuse

Child abuse is defined as any action that could or does cause significant harm to a child. This includes physical, emotional, sexual harm or neglect. It may also include bullying and discrimination. Abuse can happen to any child regardless of their age, gender, disability, race, religion or ability.

Adult [at risk] abuse is defined as a single or repeated act or lack of appropriate actions, occurring within any relationship where there is an expectation of trust, which causes harm or distress to a vulnerable person. This includes physical, emotional or sexual mistreatment, neglect or lack of care, bullying, financial, discriminatory, modern slavery or domestic abuse. Abuse can happen to any adult at risk regardless of their age, gender, disability, race, religion or ability. An adult may become vulnerable at any time and does not always remain vulnerable.

It is important to note that bullying is a form of physical and/or emotional abuse and should be dealt with as a safeguarding concern in line with the policies and procedures outlined in this document. It can take the form of adult to child abuse and child to child (peer to peer) abuse.

**Note,** 'abuse' includes all types of abuse to children and adults at risk as listed above.

**An all-encompassing approach is necessary to address and prevent abuse successfully.**

#### **Indicators of Abuse**

Abuse is not always obvious or readily visible. Indicators of abuse include but are not limited to:

- Withdrawal from friends and usual activities or difficulty making friends
- Changes in behaviour and appetite, e.g. aggression, hostility or hyperactivity
- Depression, anxiety or unusual fears
- Sudden loss of self-confidence or becoming withdrawn
- An apparent lack of supervision
- Frequent absences from activities
- Unexplained or suspicious injuries, such as bruising, cuts or burns
- Injuries with inconsistent explanations
- Reluctance to go home or attempts at running away
- Rebellious or defiant behaviour
- Attempts at suicide or self-harm
- Inappropriate sexual awareness or engaging in explicit sexual behaviour
- Disclosures about abuse

This list is not exhaustive and the presence of one or more indicators is not proof that abuse is taking place.

#### **Reasons to Suspect Abuse**

A person may become aware of abuse through:

- A disclosure made by a child.
- An observation that has been made.
- Signs or suspicions of abuse.
- An allegation made against an Official, Volunteer, member of staff or Coach.
- An allegation made about a parent or someone who is not involved within the sport.
- In response to allegations regarding poor practice or a Code of Conduct breach.
- A report from the local statutory agency.
- Etc.

**Note,** 'concern' refers to disclosures, concerns or allegations as outlined above.

#### **Position of Trust**

*"Position of trust is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. It is against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent." (NSPCC, 2019)*

Laws, proposed in March 2021, will extend the existing list of roles considered to be positions of trust, to include any regular coaching, teaching, training, supervising or instructing in a sport or religious setting.

Any concerns relating to inappropriate relationships between an individual and a young person will be handled as a criminal matter and, as such, should be referred directly to the Police in the first instance.

#### **2.2 Responding to Concerns**

Responding refers to the actions taken when you become aware of a concern or have a disclosure made to you. It is important that you gain as much information and insight as possible whilst not prejudicing any future investigation.

**When responding to a concern, you should:**

- Stay calm – do not show disgust or disbelief.
- Ensure the child is and feels safe, if responding to a disclosure made by a child.
- Listen carefully.
- Keep an open mind – do not speculate, make assumptions or make judgements.
- Find a quiet place to have the conversation.
- Keep questions to a minimum whilst the person is talking. If questions are needed to find out more information or to clarify points, then these should be open-ended questions where possible.
- Make a written note of what is said to you and read back to the person what has been written down to ensure a clear and accurate understanding has been recorded. It may be appropriate to make notes after the conversation. Note: It is crucial to write this account as soon as possible following the discussion to reduce the risk of omitting details.
- Make and agree an immediate plan as to the next action.

**You should try not to:**

- Panic.
- Make promises or agree to confidentiality – you have a duty of care to report concerns.
- Allow expressions of shock or distaste.
- Make negative comments about the alleged incident.
- Don't ask leading questions. Keep closed questions (which require a 'yes' or 'no' answer) to a minimum.

**You should never:**

- Approach any alleged perpetrator to discuss the concern.
- Make promises to the child that cannot be kept, e.g. confidentiality.
- Rush into actions that may be inappropriate.
- Take forward concerns if you have a conflict of interest. Instead pass this to an appropriate Official.

**2.3 Reporting Concerns**

The four levels of reporting include the person initially reporting the concern/allegation (the Concerned Party), the Branch/Centre Safeguarding Officer, The Pony Club Safeguarding Team and referrals made to the Police, Social Care or LADO (referred to as Statutory Agencies). The following section outlines the reporting policies and procedures for each level.

**2.3.1 Concerned Party**

**Policy for Reporting**

- Concerns that you have or that are disclosed to you should be reported directly to the Branch/Centre Safeguarding Officer immediately.
- If the concern involves the Branch/Centre Safeguarding Officer, then you should report your concerns to The Pony Club Safeguarding Team immediately.
- If you are concerned for the immediate welfare of a child you must contact the Police and/or Social Care as a matter of urgency. These are known as referrals to Statutory Agencies.
- If medical attention is required the emergency services should be contacted immediately.
- If an alleged criminal offence has taken place this should be reported to the Police.
- When contacting/referring to Statutory Agencies, the Branch/Centre Safeguarding Officer or The Pony Club Safeguarding Team should also be informed.

If you require guidance your Branch/Centre Safeguarding Officer and/or The Pony Club Safeguarding Team are here to help. If you cannot contact either officials, contact the NSPCC Helpline on 0808 800 5000. See Appendix 3 for additional useful contacts.

**If you are in any doubt, report your concern.**



### **Procedure for Reporting**

Concerns/allegations should be reported on the day they are raised, in person, by phone or email to the Branch/Centre Safeguarding Officer. Refer to Section 2.4.2 for more information on what details need to be reported for the Branch/Centre Safeguarding Officer or The Pony Club Safeguarding Team to create a case file for the concern.

### **2.3.2 Branch/Centre Safeguarding Officer**

#### **Policy for Reporting**

The Branch/Centre Safeguarding Officer should report all safeguarding concerns to The Pony Club Safeguarding Team including those that have been concluded at a local level and those that need to be referred higher due to the severity of the concern.

The Concerned Party may report their concerns directly to The Pony Club Safeguarding Team, in which case the Branch/Centre will be informed of the concerns and any proposed action. The only exception is where it may put a child/adult at risk in danger of significant harm or where the allegation concerns the Branch/Centre Safeguarding Officer. In this event, the District Commissioner or Centre Proprietor will be informed. Parents/guardians will also be informed of concerns raised about their child (under 18) provided it does not put the child/adult at risk in danger of significant harm.

If you require any guidance on how to deal with a concern, The Pony Club Safeguarding Team are here to help and can advise you in accordance with these safeguarding policies and procedures. See Section 1.9 for contact details for The Pony Club Safeguarding Team.

### **Procedure for Reporting**

The Branch/Centre Safeguarding Officer should form a case file for every concern raised, marked 'private and confidential' and forward to The Pony Club Safeguarding Team as soon as is practical by email to [safeguarding@pcuk.org](mailto:safeguarding@pcuk.org).

### **2.3.3 The Pony Club Safeguarding Team**

#### **Policy for Reporting**

The Pony Club has a duty to record all safeguarding concerns. Case files will be stored on the central database, MyConcern.

The Pony Club reserves the right to share case files with the BEF and MB's and refer cases to statutory agencies if appropriate. Information will be shared on a need-to-know basis only and confidentiality must always be maintained.

### **Procedure for Reporting**

Case files shared with the BEF will be confidential, password protected documents submitted through the MyConcern portal. Correspondence with the BEF and the sharing of case files will be recorded in the chronology of the online record and will form part of the case file.

When referring to Statutory Agencies, The Pony Club Safeguarding Team will discuss the concern with the relevant agency to determine whether the relevant agency wishes to take the case forward. If so, the case files marked 'private and confidential' will be forwarded to the relevant agency. All correspondence with Statutory Agencies will be recorded as part of the case file.

### **2.3.4 BEF Case Management Group**

The Pony Club reports all safeguarding concerns to the BEF Case Management Group via MyConcern. The BEF Case Management Group provides support and input on cases as required.

### **2.4 Recording Concerns**

The Pony Club has a legal obligation to record and monitor all relevant concerns.

### **2.4.1 Completing Case Records**

#### **Need for Detailed Records**

A detailed record of each concern should be made when raised. The record should be accurate and thorough to assist any investigation and comprise facts whilst excluding personal opinion. Where concerns are raised from hearsay, this should be explicitly stated in the case file. Relevant information should be recorded including conversations (in person, over the telephone or via email), details of persons involved (including full name, contact details, address and role/position), any action taken so far and any evidence you have (e.g. screenshots of online messages).

The completed documentation should be emailed to The Pony Club Safeguarding Team on [safeguarding@pcuk.org](mailto:safeguarding@pcuk.org).

#### **Case Files**

Each concern should have its own case file, password protected and stored on a secure database/server in accordance with data protection legislation. Access to case files should always be on a need-to-know basis only.

As a minimum, cases files will consist of:

- An incident report form
- Any conversation recording sheets
- Any supporting evidence / documentation, including screenshots, photographs or videos.

#### **• Incident Report Form**

An incident report form template (see Appendix 4) should be completed for all concerns.

The incident report form should include, where possible, the following information:

- Details of the person reporting the concern (and the person who expressed the concern initially if this person is different) including their name, date of birth, home address and contact details (telephone number and email).
- Details of the young person including their name, date of birth, home address, contact details and membership number, where applicable.
- The nature of the concern, including dates and times of incidents, persons involved and any other relevant information.
- A description of indicators you have noted, e.g. any visible bruising or injury, location, size, etc or behavioural changes.
- The young person's account, if it can be given.
- Details of the alleged perpetrator and any relevant information, including accreditation, qualifications or certifications.
- Details of witnesses to the incident, including contact details.
- Details of external agencies, if applicable, including details for the person you have spoken to (name, position and crime reference number).
- Whether the parents have been contacted, including details of what information has been communicated.
- Whether anyone else has been consulted, including details.

**Note:** Details recorded in the incident report form should remain factual where possible. The person listening to a disclosure should refrain from noting down their assumptions. If any information is raised from hearsay, then this should be clearly stated.

#### **• Conversation Reporting Form**

The Pony Club has a conversation reporting template (see Appendix 5) which should be completed when advice is sought from or when concerns are referred to Statutory Agencies. This will predominantly apply when The Pony Club Safeguarding Team cannot be contacted, and the concern needs to be reported immediately.

As a minimum, the conversation recording form should include the following information:

- Details of person who is making the referral
- Date and time of conversation
- Method of communication, e.g. telephone, in person or by email
- Details of the young person and their Branch/Centre
- Details of person you are making the referral to, including their full name, contact details and job title
- Crime reference number, where applicable
- Summary of the conversation
- Planned actions

#### • **Supporting Evidence**

Screenshots or photographs can be a good way to preserve evidence. However, evidential photographs of a child's/adult at risk's injuries may only be taken once for use as part of an investigation (Police and Criminal Evidence Act (PACE), 1984).

*"Photographs taken of an injury or clinical condition that is suspected to be non-accidental in nature must provide an accurate depiction of the subject and be captured and processed following strict departmental procedures that are modelled upon recommended best practice. If a photograph fails to prove its value as evidence, it may be considered unreliable and unsuitable for use in a legal setting." (Institute of Medical Illustrators, 2018)*

Therefore, those handling concerns on behalf of The Pony Club should not take photos of bruises or injuries as this may hinder any Police investigation or legal process. Instead, a diagram should be drawn showing the location and appearance of bruises/injuries, using as much description as possible. In this way, Pony Club actions will not obstruct a formal investigation.

#### **2.4.2 Concerned Party**

The Concerned Party will not need to complete documentation. However, notes should be taken down regarding specific details of the concern, especially where a disclosure is received from a child (see Section 2.2 for more information) to ensure the details are as accurate as possible. The concern should be recorded in full by the Branch/Centre Safeguarding Officer or The Pony Club Safeguarding Team, depending on who the concern is reported to.

#### **2.4.3 Branch/Centre Safeguarding Officer**

The Pony Club incident report form (see Appendix 4) should be completed by the Branch/Centre Safeguarding Officer for all types of concerns raised, even where no immediate action may be necessary. Where a referral has been made to Statutory Agencies, the Branch/Centre Safeguarding Officer should also complete the conversation recording sheet (see Appendix 5). Where these forms are not available, the Branch/Centre Safeguarding Officer can create their own report.

#### **These steps should be followed when recording concerns:**

1. Make clear notes about the concern ensuring as much detail as possible.
2. Where possible, read back what has been recorded to the Concerned Party to ensure a clear and accurate understanding has been captured.
3. Complete the incident report form as fully as possible with the above information.
4. Complete the conversation recording sheet for referrals where applicable.

Once completed, these documents should be handled in strict confidence, be password protected and stored in a secure location in accordance with data protection legislation.

#### **2.4.4 The Pony Club Safeguarding Team**

The Pony Club Safeguarding Team are responsible for recording case files for all concerns received at The Pony Club Office and those reported by Branch/Centre Safeguarding Officer. These should be logged on a central database to provide a platform to monitor and manage cases as appropriate. All files should be handled in strict confidence, be password protected and stored in a secure location in line with data protection legislation. Access to case files should be on a need-to-know basis only. When a Concerned Party is reporting a concern directly to The Pony Club Safeguarding Team, the policy for Branch/Centre Safeguarding Officer should be followed.

The procedure for The Pony Club Office to record Branch/Centre case files is as follows:

1. Receive the case file and save it to the server.
2. Add to central database for record, including MyConcern portal.
3. Monitor and update as appropriate.

#### **2.5 Initial Action and Investigation**

When a concern or complaint is received, The Pony Club Safeguarding Team shall decide at which level the enquiry or investigation shall take place and may do one or more of the following:

1. Refer the case back to the Branch/Centre to investigate the matter.

**Note:** Where a concern is referred back to a Branch/Centre, a report of the investigation, the outcome of the case and any sanctions must be sent to The Pony Club Office within one month.

2. Refer the matter to the appropriate Statutory Agency.
3. Carry out an independent investigation.

If The Pony Club investigation reveals a potential or actual breach of the law, the investigation should be deferred and the concern referred to the Police and/or Social Care. The investigation will not recommence until the Police/Social Care investigation has been completed and their advice received.

#### **2.6 Disciplinary Action**

**These steps should be followed when taking disciplinary action:**

1. Receive concern in writing.
2. Report to The Pony Club Safeguarding Team to determine how the matter should be managed.
3. Establish the facts, whether there were any witnesses, etc.
4. Define an appropriate course of action in line with the disciplinary process.
5. Implement proposed action.

Actions may include:

- Verbal warning
- Formal written warning
- Suspension or termination of membership
- Restriction or prohibition from attending Pony Club events
- Disciplinary hearing including full safeguarding investigation

This section should be considered in conjunction with The Pony Club Codes of Conduct and Complaints Procedure (Section 7).

#### **Verbal Warning**

A verbal warning should be given by the District Commissioner, Centre Proprietor or other appropriate Official to the person for persistent and/or severe instances of inappropriate behaviour as soon as is practicable in a private setting with an independent witness present. If given to a Member (under 18), his/her parents/guardians or another responsible adult should also be present. Reference should be made to the appropriate Code of Conduct to reiterate the expected behavioural standards.

The person receiving the warning should have the opportunity to respond if they wish, and in the light of those comments the warning may be withdrawn if appropriate, at the discretion of the Branch/Centre or person giving the verbal warning. Verbal warnings should be reported to the Branch/Centre Safeguarding Officer, District Commissioner or Centre Proprietor who should record the warning. Strict confidence should be maintained throughout.

#### **Formal Written Warning**

Repeat complaints within a two-year period should result in a written warning. Seriously poor behaviour may warrant a formal written warning without first issuing a verbal warning. An Official should be present as an independent witness when presenting written warnings, and if given to Members (under 18) the Member's parents/guardians or another responsible adult should also be present to support and understand the warning.

The individual should be given the opportunity to respond to the person issuing the warning. This discussion should remain factual and arguments should be avoided. The warning may if appropriate be withdrawn after those discussions at the discretion of the Branch/Centre or the person giving the written warning. Written warnings should be reported to the Branch/Centre Safeguarding Officer, District Commissioner or Centre Proprietor who should record the warning. The standardised letter format should be utilised. Strict confidence should be maintained throughout.

#### **Suspension or termination of membership**

It may be deemed necessary to suspend or terminate the membership of an individual for repeated, poor or excessive behaviour, whether for a set period of time or permanently. The procedure for this is detailed in the Rules of The Pony Club.

#### **Restriction or Prohibition from attending Pony Club events**

The Pony Club reserves the right to restrict and/or prohibit attendance by a person considered to be unsuitable at any of its activities. Reasons could include, but are not limited to:

- Someone who is convicted of offences against children, e.g. required to sign the Sex Offenders Register.
- Someone who continually demonstrates poor behaviour which may be detrimental to others.
- Someone whose behaviour is deemed to impact negatively on the efficient and safe running of an event, including:
  - Physical or verbal violence
  - Inappropriate language
  - Bullying
  - Disruptive behaviour
  - Drunkenness
  - Stealing
  - Sexually inappropriate behaviour or actions
  - Discrimination
  - Taking or selling illegal substances
  - Criminal behaviour

Where it is felt necessary to restrict or prohibit an individual's attendance at Pony Club events, the individual should be politely asked to leave the event and to refrain from attending future events. This should be followed up in writing within 7 days. The restriction applies to the person in question and does not extend to the Member(s), other family members or relatives. If the individual refuses to leave or continues to attend future events after being restricted, the Police should be asked to remove the individual from the premises.

If Branches/Centres require assistance or advice in requesting that someone does not attend their activities, they should contact The Pony Club Safeguarding Team.

#### **Disciplinary Hearing including full safeguarding investigation**

It may be necessary to carry out a full safeguarding investigation and disciplinary hearing when a concern has been raised in respect of safeguarding children or adults at risk. This could be in relation to abusive behaviour, abuse or position of trust matters. The Complaints Procedure (Section 7) detailed in the Pony Club Rules should be followed.

### **Appeals**

Anyone who is subject to disciplinary action may appeal against the decision(s) made in line with the Complaints Procedure (Section 7) detailed in the Pony Club Rules.

### **2.7 Child Death Reviews**

If a child dies while taking part in a Pony Club activity, the Local Safeguarding Board may initiate a child death review. The Pony Club may be asked to contribute to and support with this review.

The procedure which will be implemented in these circumstances is expanded on in the Working Together to Safeguard Children (2020) statutory guidance document.

### **2.8 Sharing Information**

Information should be shared on a strict need to know basis and should remain confidential as far as is practicable. Full confidentiality must not be promised given the duty of care to ensure that concerns of abuse are reported and action is taken to protect the child/adult at risk from further harm.

The Pony Club and its Branches/Centres reserve the right to investigate any safeguarding concern and/or to make a referral to the appropriate Statutory Agency. The priority is always the welfare of a child/adult at risk.

Information may be shared with the following people, where appropriate:

- Branch/Centre Safeguarding Officer
- The parent/guardian of the child/adult at risk (where appropriate and only if it will not harm the child/adult at risk to do so)
- The person making the allegation
- The Pony Club Safeguarding Team
- The BEF and its MBs
- Statutory Agencies: Police, Children's Social Care or LADO
- BEF Case Management Group and designated officers within The Pony Club
- Legal advisors of The Pony Club, the BEF or its MBs.

Parents/guardians have the right to be informed of concerns raised about their child/adult at risk, regardless of the circumstances. They should be informed by the Branch/Centre Safeguarding Officer or other appropriate officer. However, if telling the parents/guardians puts the child/adult at risk at further risk of significant harm this should be referred to the Branch/Centre Safeguarding Officer and/or The Pony Club Safeguarding Team before the information is shared. If the risk of harm is felt to be immediate then the Police or Social Care should be informed, and they will decide if it is appropriate to inform parents/guardians.

### **2.9 Confidentiality & Data Protection**

The Pony Club must comply with data protection legislation with regards to the use and storage of personal information. Therefore, all personal data should be treated in accordance with the six principles specified in the legislation. These principles relate to:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality

Please refer to The Pony Club's GDPR policy for further information.

## Section 3: Safer Recruitment

The Pony Club has a duty of care to ensure unsuitable people are not able to work or volunteer with children or adults at risk. This duty of care extends to Branches/Centres, and all employees and Volunteers of The Pony Club. The following policies and procedures outline the requirements that Coaches, Officials, Volunteers and members of staff are expected to meet before carrying out their roles.

**NB:** Any regular coaching, teaching, training, supervising or instructing children in a sport or religious setting is now considered a position of trust.

### 3.1 Selection & Recruitment

#### Recruitment of Volunteers and Staff within Branches/Centres

There is no set policy when recruiting volunteers and staff. However, anyone engaged in Regulated Activity/Regulated Work (see Section 5: Definitions) must comply with the following requirements:

- Enhanced disclosure checks, updated every three years (see Section 3.2).
- Attendance at an approved safeguarding workshop, updated every three years (see Section 3.4).

**Note,** Regulated Activity applies to England, Wales and Northern Ireland, and Regulated Work applies to Scotland only.

#### Recruitment of Coaches

There is no set policy for Branches/Centres when recruiting coaches. However, all Coaches (including "Accredited Coaches" and "Supervised Coaches") must have the following certifications in place:

- Enhanced disclosure check, updated every three years
- Attendance at an approved safeguarding workshop, updated every three years

In addition, "Accredited Coaches" must also have the following:

- Emergency First Aid at Work (EFAW) qualification, updated as required per certificate
- Attendance at a Continuing Professional Development (CPD) course, updated every two years

For more information on Coach accreditation and which level of Coaches require which certifications, see The Pony Club website.

#### Codes of Conduct

Codes of Conduct for Officials, Volunteers & Staff, Coaches, Members and Parents/Guardians outline the behaviour and conduct expected and what will not be tolerated when participating in or attending Pony Club activities. Individuals should be familiar with all codes of conduct that apply to them and individuals breaching a code should be required to sign a copy of the relevant code, thereby confirming that they have read, understood and commit to uphold the code.

### 3.2 Policy for Disclosure Checks

Before engaging in regulated activity/work (see Section 5: Definitions), Coaches, Officials, Volunteers and members of staff must complete an enhanced disclosure check with child barred list and show the in-date certificate they obtain to The Pony Club.

A disclosure check must be carried out by a person employing an individual. For the Pony Club, the District Commissioner or Centre Proprietor is considered the employer. However, the employer role may be delegated to the Branch/Centre Safeguarding Officer where necessary.

A check will either be clear, meaning the person is suitable to work with children, or contain content. If a check contains content, Section 3.3 Disclosures with Content must be followed.

The renewal period for disclosure checks are as follows:

- DBS checks must be updated every three years.
- Access NI checks must be updated every three years.
- PVG checks do not need to be renewed. An individual must have a PVG for each Branch or Centre for which they work/volunteer.

#### **Coaches Across Borders**

Coaches who teach across borders of England, Wales, Scotland and/or Northern Ireland require a disclosure check (DBS, PVG and/or Access NI) for each country in which they are coaching. Disclosure checks cannot be transferred across countries.

#### **Procedure for Obtaining Criminal Record / Disclosure Checks**

Disclosure checks are referred to differently in England, Wales, Scotland and Northern Ireland. The type of criminal record check you require is based on where you work in the UK, not where you live. The respective sections below provide more information on the procedure you should follow to complete a disclosure check.

##### **• England and Wales – DBS**

Disclosure checks for England and Wales are referred to as DBS checks and can be obtained through Disclosure and Barring Services (DBS). Guidance is available on The Pony Cub website.

##### **• Scotland – PVG**

Disclosure checks in Scotland are referred to as Protecting Vulnerable Groups (PVGs) and can be obtained through Disclosure Scotland. Guidance is available on The Pony Cub website.

**Note:** Coaches who work for multiple Branches/Centres will require one PVG check for each separate Branch/Centre.

##### **• Northern Ireland – Access NI**

Disclosure checks in Northern Ireland are referred to as Access NI checks and can be obtained through Access NI. For more information, contact the Area 17 Team, whose contact details are available on The Pony Club Website.

##### **• Isle of Man – DBS**

The Isle of Man has the same requirements as England and Wales. Individuals engaged in regulated activity must obtain a DBS check by completing a paper form via the Tynwald. Guidance is available by contacting the Tynwald Offices.

##### **• The Channel Islands – DBS**

The Channel Islands have the same requirements as England and Wales. DBS checks can be obtained by contacting the relevant office on Jersey, Guernsey (including Sark) or Alderney.

**NB:** Coaches are required to have an appropriate check as per the above procedures.

#### **Use of DBS Checks from Other Organisations**

DBS checks carried out by other organisations are accepted by The Pony Club providing they meet the following criteria:

- The check is enhanced with the child barred list
- The check was issued in the last three years
- The original certificate is seen which confirms that the individual is cleared to work with children.

If these criteria are not met the individual must obtain a new disclosure check through the Branch/Centre.



Those wishing to apply a DBS check to The Pony Club must show the original certificate to a Branch/Centre Official and complete a Self-Disclosure Form.

If a Coach, Official, Volunteer or staff has opted for the DBS update service this can be applied to The Pony Club. Written permission must be sought before checking an individual's disclosure status online. However, disclosure checks in Scotland and Northern Ireland must be specific to the organisation employing the individual, i.e. The Pony Club, so this information does not apply to Branches/Centres in these countries.

#### **Procedure for Transferring DBS Checks to The Pony Club**

To apply a disclosure check carried out by an external organisation to The Pony Club, the following process should be followed:

1. The certificate holder should complete a Self-Disclosure Form (available on the Pony Club website).
2. The Self Disclosure Form and original certificate should be shown to a Pony Club Official.
3. The Official checks the certificate against the criteria (above).
  - i. If certificate meets the criteria: the Official should complete the 'For Official Use' section to confirm the certificate can be applied to The Pony Club, OR,
  - ii. If certificate doesn't meet the criteria: the Official should request for a new DBS check to be completed specific for The Pony Club before the individual is able to start their role, OR,
  - iii. If the certificate contains content: The procedures defined in Section 3.3 Disclosures with Content should be followed to determine the individual's suitability to work/volunteer with children.

The completed self disclosure form should be kept on record by the Branch/Centre in accordance with data protection legislation.

#### **Procedure for DBS Update Service**

For those who have subscribed to the DBS update service, the following process should be followed:

1. The individual completes the DBS Update Permission Form (available on the website) to give written permission for a Pony Club Official to check their disclosure status online.
2. The permission form and original certificate is shown to a Pony Club Official.
3. Official checks the certificate against the criteria (above).
  - i. If certificate meets the criteria: Official proceeds with point 4.
  - ii. If certificate does not meet the criteria: Official should request for a new DBS check to be completed specific for The Pony Club before the individual is able to start their role.
4. Official completes 'For Official Use' section to confirm the certificate can be applied to The Pony Club.
5. Official updates coach/volunteer record on Pelham database.

If a check comes back clear, The Pony Club can update coaching/volunteering records for the next 3 years, with the date checked becoming the new issue date. If content is identified, the online system will not detail the content, so the Official should ask the individual to complete a new DBS check to establish what the content is.

The completed permission form should be kept on record by the Branch/Centre in accordance with data protection legislation.

#### **3.3 Disclosures with Content** **Policy for Disclosures with Content**

A Branch/Centre must ensure Coaches, Volunteers or staff hold a clear disclosure check. If a disclosure contains content it must be considered by The Pony Club Safeguarding Team, who will determine the suitability of the individual to work or volunteer with children using the table below.

**Note**, this is not an exhaustive list, and the level of consideration may change depending on the circumstances of the offence(s).

Level of Consideration	Type of Offence / Conviction
Some discussion	- Criminal motoring offences such as drink driving
Panel discussion	- More severe offences, e.g. theft - Historic offences - Failure to declare prior conviction(s) - Spent convictions
Likely to be instant dismissal/rejection	- Violent offences - Drug abuse - Child/adult at risk abuse - Sex offenders - Child pornography offences

#### **Procedure**

All applicants will receive a copy of their disclosure certificate. The Branch/Centre must inspect the original certificate to ensure the individual is clear to work or volunteer with children. **Note**, DBS checks obtained online will be notified to the Branch/Centre via email. Clear electronic certificates can be used in place of the original certificate and the individual can start or continue their role.

The following procedure will be followed:

1. A copy of the certificate and further details of the conviction(s) listed, including the incident, circumstances involved and details of any charges should be submitted to the Pony Club Safeguarding Team, who will consider in conjunction with the Area Representative and determine the individual's suitability to work or volunteer with children.
2. The Pony Club will also consult their insurance underwriters before reaching a decision.
3. The Branch/Centre and individual will be informed of the decision and any additional requirements that apply.

The Pony Club will aim to acknowledge receipt of correspondence within 7 days and to make and communicate a decision within 21 days. Strict confidentiality must be maintained throughout the process.

### **3.4 Safeguarding Workshops**

#### **Levels of Training**

The Pony Club recognises three levels of training:

- 1) Initial training
- 2) Safeguarding for Equestrians training (face-to-face/virtual/online)
- 3) Club Safeguarding Officer training (virtual)

#### **Policy for Safeguarding Workshops**

##### ***Initial training***

Individuals, who do not meet the regulated activity/work requirements (such as fence judges and caterers), should be signposted to external providers of safeguarding training aimed at awareness or introductory standard.

##### ***Safeguarding for Equestrians Training***

All individuals engaged in regulated activity/work must attend an approved safeguarding workshop. The only exception to this rule is for:

- First aiders who only require a disclosure check, and,

- Those at residential camps where a minimum of two overnight supervisors have attended an approved safeguarding workshop. Nevertheless, it is strongly recommended that all people engaged in regulated activity/work on an overnight basis attend an approved safeguarding workshop.

The first approved safeguarding workshop attended must be a face to face. This may be followed three years later by an online refresher course. However, as a minimum, individuals should attend a face-to-face course every six years.

Virtual training is considered the same as face-to-face training.

#### ***Club Safeguarding Officer Training***

All individuals carrying out a Branch/Centre Safeguarding Officer role must attend this training every three years. The training will be offered virtually, in conjunction with BEF, and will be in line with government requirements and legislation.

#### **Approved Workshops (Safeguarding for Equestrians Training)**

The Pony Club has a network of Safeguarding Trainers who deliver the BEF Safeguarding for Equestrians workshop. This course is also offered by other BEF member bodies, e.g. the BHS and RDA. The course content is tailored to equestrian activities and is recognised by UK Coaching.

The Pony Club also has a list of pre-approved courses that can be attended in place of the BEF Safeguarding for Equestrians course. These include:

- UK Coaching: Safeguarding and Protecting Children
- SportScotland: Child Wellbeing and Protection in Sport
- SportScotland: In Safe Hands
- Sport Ireland: Safeguarding and Protecting Young People in Sport
- CPSU Time to Listen
- NSPCC courses (depending on the level)
- Designated Lead Officer 3-day courses offered by your Local Authority

#### **Policy for Organising a Pony Club Safeguarding Workshops**

Safeguarding workshops are organised centrally on a quarterly basis with a wide geographical spread. Face to face courses require a minimum of 15 participants to run; virtual sessions can be delivered with 7-10 participants. Courses are advertised on The Pony Club Events Page and via email. Costs are managed by The Pony Club Office, including collecting payments and covering Safeguarding Tutor's fees and travel expenses. Due to the nature of the content, there is a minimum age of 16 years for attendees. Those under the age of 18 must be accompanied by a responsible adult.

#### **Using a Different Safeguarding Workshop as a Qualifying Certification**

Any individual who has attended a safeguarding workshop, other than those on the pre-approved list, can apply for their prior learning to be taken into consideration by completing an Accreditation of Prior Learning (APL) form. This form can be downloaded from the website and should be submitted along with a copy of the certificate of attendance and course content details (e.g. list of topics or copy of presentation/handout). The Pony Club Safeguarding Team will aim to acknowledge receipt within 7 days and to make and communicate a decision, including reasons for the decision, within 21 days.

#### **3.5 Whistle Blowing**

It is essential that Coaches, Officials, Volunteers and staff know what to look out for and how to report safeguarding or poor practice concerns and are aware of the Pony Club whistle blowing policy (Section 7).

## Section 4: Pony Club Events & Camps

This policy should be read in conjunction with Covid-19 guidance available on The Pony Club website. Local guidance and restrictions will supersede national guidance so a good knowledge of local requirements must be maintained.

### 4.1 Use of External Venues

#### Policy

The Pony Club reserves the right to cease using any venue where an owner, resident, visitor or employee (whether paid or voluntary) is being investigated for or has been convicted of an offence against children and/or adults at risk. A report or concern of this nature may be raised by:

- The local Police or Social Care department
- Someone working for or involved with the venue
- Someone working for or involved in The Pony Club, or,
- A member of the public.

If The Pony Club or any of its Branches/Centres receive a report or concern regarding the suitability of any individual at a venue and believes it is sufficiently credible to warrant investigation, then the use of that venue will be suspended pending investigation. If a person has been convicted the venue will not be used by Branches/Centres until there is no longer a risk to the welfare and safety of Pony Club Members.

#### Procedure

The decision to suspend the use of a venue will be taken by The Pony Club Safeguarding Team, who will inform Branches/Centres of the suspension.

The reason for the suspension will not be specified. However, it is likely that the local community will be aware of the situation already. Therefore, confidentiality will be maintained as far as is practicable.

### 4.2 Residential Events

When organising residential events, such as summer camps, the following should be considered before the planned event goes ahead:

**Risk Assessment:** A full risk assessment should be completed, as per Health & Safety Rules.

**Supervisor Requirements:** All supervisors must meet the requirements outlined in Section 3 - Safer Recruitment: i.e. have an enhanced disclosure check and have attended an approved safeguarding workshop. At least one supervisor should be appropriately first aid trained.

A minimum of two supervisors must be present at overnight camps. This should form part of the event risk assessment and more than two supervisors may be needed depending on numbers attending. Where male and female Members attend overnight camps, at least one male and one female supervisor must be present.

The suggested ratio for supervisors during daytime activities is as follows:

- Members aged 5 to 10 years = ratio of 1 adult to 4 children
- Members aged 10 to 16 years = ratio of 1 adult to 10 children

This ratio may change if Members have disabilities or learning difficulties.

**Consent and Health Information:** Consent, medical and special dietary requirement details should be collected before the camp starts by completing the Medical Consent Form available on the website. Members under 18 need consent from their parent/guardian. Medical consent forms must be kept secure and only

accessible to those who require access. They should be destroyed when no longer required, likely to be the end of the residential event.

**Medication:** All medication should be given to a designated adult for safe keeping and must be kept in a locked area only accessible by the designated person. All medication should come in the original pharmaceutical packaging with instructions and the correct dosage clearly marked. Further information on the handling and administration of medication is available on The Pony Club website.

**Camp Arrangements:** Sleeping arrangements and shower/toilet facilities should be planned in advance. There must be separate sleeping and bathroom facilities for male and female Members. It is inappropriate for a supervisor to share a room with Members, unless the child is their own.

**Transportation:** The transportation policy (Section 4.3) should be adhered to when formally arranging transport to another venue.

**Codes of Conduct:** Members are expected to abide by the Code of Conduct for Members. Any breach of this code may result in the member being sent home and/or appropriate disciplinary action been taken.

**Contact Details:** Parents/guardians' contact details must be readily available for the camp organiser or supervisor for use in an emergency. Likewise, the parents / guardians should have the contact details of the camp organiser or other designated official for use in an emergency. This information must be kept secure and only accessible to those who require access. It should be destroyed when no longer required, likely to be the end of the residential event.

**Emergency Protocol:** The Branch/Centre should have an emergency procedure in place to cover, for example: fire outbreak, a child needing hospitalisation or a child being sent home for poor behaviour. Members, parents/guardians and Officials/Volunteers/Coaches should be aware of this procedure.

**Additional Guidance:** See section 7 for guidance on organising residential events.

#### **4.3 Transportation**

When organising transport for Members to and from Pony Club activities, the Branch/Centre must ensure that only suitable people are driving and Members are transported as safely as possible. Ideally parents/guardians should make their own transport arrangements, either driving their own child/adult at risk or carpooling with others.

In most instances it is the responsibility of the parent/guardian to transport their child/adult at risk and horse/pony to and from the activity. If several parents/guardians make plans between themselves this is a private arrangement and therefore not the responsibility of The Pony Club.

In some circumstances though, the Branch/Centre may consider booking transport, e.g. for a trip to a horse show or during summer camp. It is important to gain consent and a completed medical form from parents/guardians before Members (under 18) are transported by Branch/Centre Officials. Members over 18 should give their consent. The options available if this is the plan include:

- The use of private cars
- Hiring transport, such as minibuses
- Hiring a coach from a reputable commercial company.

Where a Branch/Centre organises transport (known as "official transport arrangements"), it is essential that a transport plan is developed and publicised to Members and parents/guardians before the planned trip goes ahead. This plan should include:

- Plan for the day

- Venue/destination
- Clear expectation of drop off and collection times
- Mode of transport
- Emergency contact details of responsible person
- Late collection policy

### **Procedure for Arranging Transport**

#### **Private Arrangements**

This is an arrangement between parents/guardians and should not involve the Branch/Centre.

#### **Options for Arranging Official Transport**

If a Branch/Centre assumes responsibility for transport, the following points need to be addressed.

#### **Use of private cars**

- Drivers must be suitable and meet the requirements outlined in Section 3: Safer Recruitment, i.e. must have an enhanced disclosure check and have attended an approved safeguarding workshop.
- Drivers must have a valid driving licence.
- Drivers should have motor insurance which includes business travel and breakdown cover.
- Vehicles must be roadworthy, suitable for the number of passengers, have functioning seatbelts and child car seats where necessary.
- Vehicles must be registered with the event organiser.
- Children should wear seatbelts. They should have a booster seat if they are under 12 and less than 135cm tall.
- Children must sit in the back of the car and responsible adults in the front, where possible.

#### **Hiring Transport, e.g. minibus**

- Drivers must be suitable and meet the requirements outlined in Section 3: Safer Recruitment, i.e. have an enhanced disclosure check and have attended an approved safeguarding workshop.
- Drivers must have a valid licence and specific training to drive the type of vehicle.
- Drivers should have motor insurance which includes business travel and breakdown cover.
- Vehicles must be roadworthy, suitable for the number of passengers, have functioning seatbelts and child car seats where necessary.
- Children should wear seatbelts and have a booster seat if they are under 12 and less than 135cm tall.
- There must be an anchor point for wheelchair users, where possible.

#### **Hiring a coach from a reputable commercial company**

- The Branch/Centre is entitled to assume that the company hiring the coach properly maintains and insures the vehicles and employs properly licensed drivers.
- There must be an anchor point for wheelchair users, where possible.
- Under no circumstances should Members travel unaccompanied on coaches. They should always be supervised by responsible adults appointed by the Branch/Centre.

#### **Consent**

Consent must be obtained from a Member (if over 18) and/or their parents/guardians (if under 18) before embarking on a trip. This can be obtained using the medical consent form available on The Pony Club website which combines a consent form with health record, so all information is on one document. This information must be kept secure and only accessible to those who require access. It should be destroyed when it is no longer required, likely to be the end of the residential event.

#### **Supervision**

Supervision requirements for transport and during the trip must be considered as part of the risk assessment. Requirements will be influenced by factors including the type of activity, destination, number and age of Members attending.

No child or adult at risk should be left alone in a car, minibus or coach with the driver, unless it is the adult's own child/adult at risk. If in extenuating circumstances this situation does arise, the child or adult at risk should sit in the back of the car if possible. Members going on the trip must be happy with the arrangements and adults should be alert to any signs of concern.

#### **Contact Details**

Parents/guardians must have the contact details for the person in charge and for the driver who is transporting their child or adult at risk to and from the event. Likewise, the organiser and driver(s) should have the parent/guardian's mobile number in case of emergency. Contact details for an alternative person should also be gained in case the parent/guardian cannot be contacted. These must always be readily available but kept secure and only accessible to those who require access. It should be destroyed when it is no longer required, likely to be the end of the residential event.

#### **Journey Considerations**

Journey time and distance, whether stopping points are required and whether more than one driver is needed for the journey should be considered. The number of driving and non-driving hours for the designated driver should be considered as part of the risk assessment to ensure the expectation is reasonable and does not risk the safety of those going on the trip.

#### **Late Collection:**

In the event of a late collection of Members, the Official or Coach should:

- Attempt to contact the parent/guardian in the first instance.
- Check the contact number for any further information regarding the Member.
- Attempt to contact the alternative contact if the parent/guardian cannot be contacted.
- Wait with the Member(s), preferably in the company of others.
- If contact cannot be made the situation should be reported to the Police or Social Care.

#### **You should never:**

- Take a Member home or to any other location alone.
- Send a child home with another person without consent from the parent/guardian.

#### **4.4 Travelling Abroad:**

The Pony Club does not have a specific policy on travelling abroad. However, the same policy would apply as outlined in Section 4.2: Residential Events.

#### **4.5 Display of Safeguarding Commitment**

It is recommended that each Branch/Centre publishes their commitment to safeguarding members. The following statement is recommended:

*The Pony Club takes its safeguarding responsibilities very seriously. If concerns are raised that any child may be suffering or likely to suffer significant harm, then the Branch/Centre Safeguarding Officer has a duty of care to report these concerns to the relevant statutory agency (including the Police, Social Care and LADO) in line with local guidance.*

*In the (insert name of Branch/Centre) of The Pony Club, the Safeguarding Officer is (insert name) who can be contacted on (insert contact number) if you wish to discuss specific issues.*

## Section 5: Key Definitions

### GLOSSARY

Terminology	DEFINITION
<b>Access NI Check</b>	<p>Disclosure checks in Northern Ireland are referred to as Access NI checks. Access NI checks are very similar to DBS checks in England and Wales with three levels of checks available – basic, standard and enhanced. The Children’s and Adults’ Barring List can also be inclusive on a criminal record check for those who carry out roles with children and/or adults at risk (refer to regulated activity for more information). The detail provided on disclosure certificates varies according to the level of check required (refer DBS check for more information).</p> <p>Pony Club staff and volunteers must have an enhanced check with child barring list.</p>
<b>Adult at Risk (previously Vulnerable Adults)</b>	<p>A person aged 18 or over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself from significant harm or serious exploitation. A person can fall under this definition at any time but may not remain defined this way for a long period of time.</p> <p>When a young person reaches the age of 18 the responsibility for their wellbeing may transfer to adult service providers. Although they cease to be subject of the Safeguarding Children Procedures, some adults may continue to be vulnerable.</p>
<b>Adult [at Risk] Abuse</b>	<p>Adult abuse is a single or repeated act or lack of appropriate actions, occurring within any relationship where there is an expectation of trust, which causes harm or distress to a vulnerable person.</p> <p>Adult abuse may include: physical harm, sexual harm, emotional harm, financial / material abuse, neglect or acts of omission, discriminatory harm, domestic abuse, organisational abuse, modern slavery and self-neglect.</p>
<b>Adult Workforce</b>	Anyone whose work involves adults at risk.
<b>Allegation</b>	A claim or assertion that someone has done something illegal or wrong, typically one made without proof.
<b>Branch/Centre Safeguarding Officer</b>	A person appointed to take responsibility for safeguarding within a Branch/Centre.
<b>Child Protection (reactive)</b>	<p>Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are like to suffer, significant harm.</p> <p><i>(Source: Working together to safeguard children, 2015)</i></p>
<b>Abuse (Child)</b>	<p>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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.</p> <p><i>(Source: Working together to safeguard children, 2015)</i></p>
<b>Child Centred Approach</b>	Policies based on a clear understanding of the needs and views of children.



<b>Child Workforce</b>	Anyone whose work involves children.
<b>Child/Children (includes young person)</b>	Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection. (Source: Working together to safeguard children, 2015)
<b>The Pony Club Safeguarding Team</b>	The team based at The Pony Club Office which comprises a Lead Safeguarding Officer and Development Officer
<b>Code of Conduct</b>	The set of behavioural standards established as the minimum standards of behaviour expected of coaches, officials, volunteers, staff, members and parents/guardians.
<b>Concern</b>	To be worried about something and feel it is important to do something about it.
<b>Confidentiality</b>	The keeping of information secret or private, only sharing with those who need to know.
<b>Conflict of Interest</b>	A situation in which an individual has perceived or actual competing interests or loyalties.
<b>Disclosure</b>	The act of making something known, including a child or adult at risk revealing something that has happened to them.
<b>Disclosure Checks (also known as Criminal Record Checks)</b>	<p>Disclosure checks are a background check on a person's criminal history or police record, used by potential employers to assess an individual's suitability for certain jobs or voluntary work, particularly with children or adults at risk, or when fostering or adopting children.</p> <p>If a person's disclosure check contains content (i.e. they have convictions or cautions on their police record) this will be shown on their certificate in the format of: court/police area, date of conviction/caution, offence and sentence/disposal. It will only show factual information, not specific details surrounding the conviction.</p> <p>Disclosure checks are referred to differently in England, Wales, Scotland and Northern Ireland. The check required relates to the place of work in the UK, not place of residence.</p> <ul style="list-style-type: none"> <li>• England DBS</li> <li>• Wales DBS</li> <li>• Scotland PVG</li> <li>• Northern Ireland Access NI</li> </ul>
<b>Disclosure &amp; Barring Services (DBS) Check</b>	<p>Disclosure checks for England and Wales are referred to as Disclosure &amp; Barring Services (DBS) checks. There are three levels of DBS checks – basic, standard and enhanced. The Children's and Adults' Barring List can be included on a criminal record check for those who carry out roles with children and/or adults at risk. The detail provided on disclosure certificates varies according to the level of check required.</p> <ul style="list-style-type: none"> <li>• Basic checks provide details of unspent convictions only.</li> <li>• Standard checks provide details of unspent and spent convictions and cautions.</li> <li>• Enhanced checks provide details of unspent and spent convictions, cautions, and police intelligence if deemed relevant.</li> <li>• Inclusion of children's barring list will provide information relevant to a person's suitability for working with children.</li> <li>• Inclusion of adults' barring list will provide information relevant to a person's suitability for working with adults at risk.</li> </ul>

	Pony Club staff and volunteers require an enhanced check with child barring list.
<b>Duty of Care</b>	A moral or legal obligation to ensure the safety or well-being of others.
<b>MyConcern</b>	MyConcern is a safe and secure system utilised for recording and managing safeguarding concerns within The Pony Club.
<b>Parental Responsibility</b>	<p>The parental right to make decisions about the care and upbringing of a child. Parents will primarily have this responsibility, but in some circumstances it will be assumed by the local authority or adoptive parents. Where consent is required, it should be obtained from those who have parental responsibility.</p> <p>Where 'parent/guardian' is stated in this document, this refers to the person or people who have parental responsibility for the child.</p>
<b>Poor Practice / Conduct</b>	Staff or volunteer failure to provide a good standard of care and support. If allowed to continue, poor practice can cause harm and become abuse.
<b>Position of Trust</b>	An adult is in a position of trust over a child if they regularly coach, train, supervise or have sole charge of the child. Pony Club positions of trust include coaches, officials, volunteers, event supervisors and camp supervisors. Coaches and officials potentially have power and influence over children for whom they are responsible and should maintain healthy, positive and professional relationships with all members.
<b>Protecting Vulnerable Groups (PVG) Check</b>	<p>Disclosure checks in Scotland. PVG is a membership scheme which ensures that people who are barred from working with certain vulnerable groups (children or adults at risk) are not able to do so (refer to regulated work for more information).</p> <p>There are three types of Scheme Records (i.e. criminal record checks) available: scheme record, scheme record update and scheme membership statement.</p> <ul style="list-style-type: none"> <li>• Scheme record is the initial membership set up equivalent to an enhanced disclosure check showing all conviction information and if the individual is listed/under consideration for listing (list of those who are barred from working with vulnerable groups).</li> <li>• Scheme record update is utilised for individuals who are already a member of the PVG scheme and is a quicker method of checking someone without requesting the individual's scheme record.</li> <li>• Scheme membership statement is used for those who are self-employed or who wish to join the scheme in anticipation of undertaking a role in regulated work in the future.</li> </ul> <p>Pony Club staff and volunteers must have a scheme record or scheme record update for regulated work with children.</p>
<b>Regulated Activity</b>	<p>Applies to England, Wales, Northern Ireland, Isle of Man and the Channel Islands</p> <p>Regulated Activity is where a person has responsibility for children including:</p> <ul style="list-style-type: none"> <li>• Unsupervised activities, i.e. coaching, training, teaching or instructing, caring for or supervising children</li> <li>• Providing advice or guidance on well-being to children</li> <li>• Driving a vehicle only for children.</li> </ul> <p>Working for establishments (known as 'specified places' including schools and colleges) with unsupervised contact with children is also considered regulated activity. This includes volunteers and those who are remunerated.</p> <p>Activity is only considered regulated activity if done on a regular or overnight basis.</p> <ul style="list-style-type: none"> <li>• Regular is work carried out three days or more in a thirty-day period.</li> </ul>

	<ul style="list-style-type: none"> <li>Overnight is with a child/adult at risk between the hours of 2am and 6am regardless of whether officially "on duty", awake or asleep.</li> </ul>
<b>Regulated Work</b>	<p>Applies to Scotland only Regulated Work is where the normal duties of an individual include:</p> <ul style="list-style-type: none"> <li>Caring for children</li> <li>Coaching, teaching, instructing, training or supervising children</li> <li>Being in sole charge of children</li> <li>Unsupervised contact with children under arrangements made by a responsible adult</li> <li>Providing advice and/or guidance which relates to physical or emotional well-being, education or training</li> <li>Moderating a public electronic interactive communication service intended for use by children, e.g. social media accounts.</li> <li>Providing a care home, independent health care or day care service for children</li> <li>Providing overnight accommodation or supervision</li> <li>Supervising and/or managing an individual doing regulated work with children</li> </ul> <p>The Protection of Vulnerable Groups (Scotland) Act 2007 does not specify the frequency or duration of regulated work. Instead the activity or work must be considered as part of an individual's normal duties.</p> <p>Normal duties is activity or work that an individual might be expected to do as part of their role. This is likely to be included in the job description, something that can reasonably be anticipated or something that occurs regularly. Any regulated work forming part of normal duties will only need to be carried out once for a person to require a PVG check. For example, a coach who teaches at a training session once during the summer holidays will need a PVG check because teaching is considered as the normal duties of a coach in their job description.</p> <p>Normal duties exclude one-off occurrences and unforeseeable events, e.g. emergencies.</p>
<b>Safeguarding (proactive)</b>	<p>Safeguarding and promoting the welfare of children – Protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best life chances. (Source: Working together to safeguard children, 2015)</p>
<b>Child Sexual Abuse</b>	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (Source: Working together to safeguard children, 2015)</p>
<b>Statutory Agencies</b>	The local Police, Social Care and/or Local Authority Designated Officer (LADO).
<b>Supervision</b>	To be in full sight and sound at all times.

<b>Local Authority Designated Officer (LADO)</b>	County level and unitary local authorities should ensure that allegations against people who work with children are not dealt with in isolation. Any action necessary to address corresponding welfare concerns in relation to the child or children involved should be taken without delay and in a coordinated manner. Local authorities should, in addition, have designated a particular officer, or team of officers (either as part of multi-agency arrangements or otherwise), to be involved in the management and oversight of allegations against people who work with children. Any such officer, or team of officers, should be sufficiently qualified and experienced to be able to fulfil this role effectively, for example qualified social workers. Any new appointments to such a role, other than current or former designated officers moving between local authorities, should be qualified social workers. Arrangements should be put in place to ensure that any allegations about those who work with children are passed to the designated officer, or team of officers, without delay.
<b>Young Carer</b>	A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).
<b>Parent Carer</b>	A person aged 18 or over who provides or intends to provide care for a disabled child for whom the person has parental responsibility.
<b>Education, Health and Care Plan</b>	A single plan, which covers the education, health and social care needs of a child or young person with special educational needs and/or a disability (SEND). Refer to the Special Educational Needs and Disability Code of Practice 0-25 (2014).
<b>Safeguarding Partners</b>	A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 as: (a) the local authority, (b) a clinical commissioning group for an area any part of which falls within the local authority area, and (c) the chief officer of police for an area any part of which falls within the local authority area. The three safeguarding partners should agree on ways to co-ordinate their safeguarding services; act as a strategic leadership group in supporting and engaging others; and implement local and national learning including from serious child safeguarding incidents. To fulfil this role, the three safeguarding partners must set out how they will work together and with any relevant agencies as well as arrangements for conducting local reviews
<b>Child Death Review Partners</b>	<p>A child death review partner in relation to a local authority area in England is defined under the Children Act 2004 as:</p> <p>(a) the local authority, and</p> <p>(b) any clinical commissioning group for an area any part of which falls within the local authority area.</p> <p>The two partners must make arrangements for the review of each death of a child normally resident in the area and may also, if they consider it appropriate, make arrangements for the review of a death in their area of a child not normally resident there. They must also make arrangements for the analysis of information about deaths reviewed under this section. The purposes of a review or analysis are</p> <p>(a) to identify any matters relating to the death or deaths that are relevant to the welfare of children in the area or to public health and safety, and</p> <p>(b) to consider whether it would be appropriate for anyone to take action in relation to any matters identified.</p>

Types of Abuse	DEFINITION
<b>Abuse of Trust</b>	Sexual activity between an adult in a position of trust and a child is deemed to be an abuse of trust and is unlawful, even if the child is over the age of consent (i.e., 16 or 17 years).
<b>Bullying</b>	<p>Bullying can be adult to child abuse and child to child abuse. Bullying is a form of physical and/or emotional abuse and should be dealt with as a safeguarding concern in line with the policies and procedures outlined in this document.</p> <p>As with all abuse, bullying can take many forms, including:</p> <ul style="list-style-type: none"> <li>• <b>Physical:</b> hitting, kicking, pinching, punching, spitting, damage to or taking someone else's belongings.</li> <li>• <b>Verbal / Emotional:</b> offensive name calling, insults, racist remarks, sexist jokes / comments, homophobic, transphobic or gender-related jokes or comments, teasing, threats or using abusive language.</li> <li>• <b>Sexual:</b> abusive sexualised name calling, inappropriate or uninvited touching, inappropriate sexual innuendos or propositions.</li> </ul> <p><b>Indirect:</b> spreading nasty stories or rumours about someone, intimidation, or exclusion from social groups.</p>
<b>Child Sexual Exploitation (CSE)</b>	<p>Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.</p> <p>(Source: Working together to safeguard children, 2015)</p>
<b>Cyber-bullying</b>	<p>Bullying using technology to deliberately harm or upset others, including mobile phones, tablets and the internet. It may involve sending hurtful messages, using videos/images to humiliate, leaving malicious voicemails, prank/silent calls, hurtful comments on social media, excluding someone from chat groups, or 'happy slapping' (sending videos / images of people being bullied).</p>
<b>Emotional Abuse</b>	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p> <p>(Source: Working together to safeguard children, 2015)</p> <p>Examples of emotional abuse include children subject to constant criticism, name calling, sarcasm, bullying, racism or unrealistic pressure to perform to high standards.</p>
<b>Extremism</b>	Extremism goes beyond terrorism and includes people who target the vulnerable –

	<p>including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.</p> <p>(Source: Working together to safeguard children, 2015)</p>
<b>Grooming</b>	<p>Communication with a child with an intention to meet and commit a sex offence with that person. The process may involve manipulation of those around them and the child, to provide opportunities to abuse the child and reduce the likelihood of being reported or discovered. The perpetrator will attempt to manipulate the circumstances to facilitate frequently being in an unobserved one to one situation with that person.</p>
<b>Hazing</b>	<p>Activity expected or demanded of a person when joining a group, or to maintain status in a group, or that humiliates, degrades or risks emotional/physical harm regardless of the person's willingness to participate. Hazing activities include sleep deprivation, personal servitude, binge drinking/drinking games, carrying out dangerous stunts, being forced to wear embarrassing attire, or sexual assaults.</p>
<b>Neglect</b>	<p>The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:-</p> <ol style="list-style-type: none"> <li>provide adequate food, clothing and shelter (including exclusion from home or abandonment)</li> <li>protect a child from physical and emotional harm or danger</li> <li>ensure adequate supervision (including the use of inadequate caregivers)</li> <li>ensure access to appropriate medical care or treatment</li> </ol> <p>It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p> <p>(Source: Working together to safeguard children, 2015)</p>
<b>Physical Abuse</b>	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p> <p>(Source: Working together to safeguard children, 2015)</p>
<b>Radicalisation</b>	<p>Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.</p> <p>(Source: Revised Prevent Duty Guidance for England and Wales, 2015)</p>
<b>County Lines</b>	<p>As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.</p>
<b>Child Criminal Exploitation</b>	<p>As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve</p>

	physical contact; it can also occur through the use of technology.
<b>Domestic Abuse</b>	<p>Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.</p> <p>Domestic abuse continues to be a prevalent risk factor identified through children social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others such as the non-abusive parent. More information can be found in the Draft Domestic Abuse Statutory Guidance Framework, including the new statutory definition of domestic abuse that will be introduced when the Domestic Abuse Bill is enacted.</p>
<b>Controlling or Coercive Behaviour (Also referred to as coercive control)</b>	<p>The use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence.</p> <p>Controlling and coercive behaviour is outlined in Government guidance issued under section 77 of the Serious Crime Act 2015 as part of the Government's non-statutory definition of domestic violence and abuse. It is described as:</p> <ul style="list-style-type: none"> <li>• 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; and</li> <li>• Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim</li> </ul> <p>Coercive control is a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear. This has a significant impact on children and young people, both directly, as victims in their own right, and indirectly due to the impact the abuse has on the non-abusive parent. Children may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused.</p> <p>Controlling or coercive behaviour also form part of the definition of domestic abuse in section 1(3)(c) of the Domestic Abuse Bill. More information can be found in the Draft Domestic Abuse Statutory Guidance Framework.</p>
<b>Upskirting</b>	Is the covert use of a mobile phone or other photographic equipment placed beneath a person's clothing to take a voyeuristic photograph without the individual's knowledge or consent, often, but not exclusively in crowded places. The victim could be male or female but wearing loose clothing, e.g. skirts, dresses, kilts, shorts or wide legged trousers. This is a criminal offence and could result in a 2 year prison sentence.

## Section 6: Appendices

### Appendix 1 Legal/Statutory Framework

This policy has been drawn up based on the law and guidance that seeks to protect children, including:

- Working together to safeguard children; HM Government 2020
- Police Crime, Sentencing and Courts Bill 2021 - *Pending*
- Children Act 1989 & 2004
- United Convention of the Rights of the Child 1991
- Police Act 1997
- Data Protection Act 1998
- Human Rights Act 1998
- Freedom of Information Act 2000
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015
- What to do if you're worried a child is being abused; HM Government 2015

This is not an exhaustive list.



## **Appendix 2 - Seven Golden Rules to Sharing Information**

### ***Information Sharing Advice March 2015***

1. Remember that the Data Protection Act (1998) and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual and/or their family from the outset about why, what, how and with whom information will or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing information, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well – being: Base your information sharing decisions on considerations of the safety and well – being of the individual and others who may be affected by their actions.
6. Necessary; proportionate; relevant; adequate; accurate; timely and secure: Ensure that the information is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

### **Appendix 3 - Myth Busting Guide for Sharing Information**

Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children. Below are common myths that may hinder effective information sharing.

***Myth: Data protection legislation is a barrier to sharing information***

No, the Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

***Myth: Consent is needed to share personal information***

No, you do not need consent to share personal information. It is one way to comply with the data protection legislation but not the only way. The GDPR provides a number of bases for sharing personal information. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child if there is a lawful basis to process any personal information required. The legal bases that may be appropriate for sharing data in these circumstances could be 'legal obligation', or 'public task' which includes the performance of a task in the public interest or the exercise of official authority. Each of the lawful bases under GDPR has different requirements. It continues to be good practice to ensure transparency and to inform parent/ carers that you are sharing information for these purposes and seek to work cooperatively with them.

***Myth: Personal information collected by one organisation/agency cannot be disclosed to another***

No, this is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.

***Myth: The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information***

No, this is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.

***Myth: IT Systems are often a barrier to effective information sharing***

No, IT systems, such as the Child Protection Information Sharing Project (CP-IS), can be useful for information sharing. IT systems are most valuable when practitioners use the shared data to make more informed decisions about how to support and safeguard a child.

*(Source: Working together to safeguard children, 2020)*

## **Appendix 4 – Support and Useful Contacts**

Matters relating to a child protection concern can be distressing for all involved. Several organisations in the UK provide support and guidance to anyone involved in any capacity. These include:

### **NSPCC Helpline**

- 24 hour free and confidential helpline that provides counselling, information and advice to anyone concerned about a child or adult at risk of ill treatment or abuse.
- Tel: 0808 800 5000
- Website: [www.nspcc.org.uk](http://www.nspcc.org.uk)

### **Child Protection in Sport Unit (CPSU)**

- Sport department which runs under the NSPCC.
- Tel: 01162 347278
- Website: [www.thecpsu.org.uk](http://www.thecpsu.org.uk)

### **Child Line**

- 24 hour free and confidential helpline for children.
- Tel: 0800 111
- Website: [www.childline.org.uk](http://www.childline.org.uk)

### **Children 1<sup>st</sup> – Parent Line**

- Free helpline, email and web-chat service in Scotland for anyone caring for or concerned about a child.
- Tel: 0800 028 2233
- Website: [www.children1st.org.uk](http://www.children1st.org.uk)

### **Victim Support**

- Provide emotional support, information and practical help for victims and witnesses.
- Tel: 0845 3030 900
- Website: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

### **Bullying UK**

- Tel: 0808 800 2222
- Website: [www.bullying.co.uk](http://www.bullying.co.uk)

### **The Samaritans**

- Tel: 116 123
- Website: [www.samaritans.org](http://www.samaritans.org)

### **Local Authority or Local Social Service**

### **Child Exploitation & Online Protection Centre (CEOP)**

- Tel: 0870 000 3444
- Website: [www.ceop.police.uk](http://www.ceop.police.uk)

### **Internet Matters**

- Website: [www.internetmatters.org](http://www.internetmatters.org)

### **Self Help**

- Website: [www.self-help.org.uk](http://www.self-help.org.uk)

### **Kidscape**

- Tel: 02077 303300
- Website: [www.kidscape.org.uk](http://www.kidscape.org.uk)

### **Family Lives**

- Tel: 0808 800 222
- Website: [www.familylives.org.uk](http://www.familylives.org.uk)

## Appendix 5 – Safeguarding Incident Report Form

This form should be completed to record the details of any concerns raised at a Branch/Centre. A copy **must** be sent to The Pony Club Safeguarding Team. This form should be completed for all levels of concern, even where no immediate action may be necessary. This document should be kept **confidential** when completed.

Case File Details	
Date of when concern was notified to you:	
Branch/Centre:	

Details of Person Completing (your details)		
Name:		
Role within The Pony Club:		
Email:		
Contact number:		
Are you reporting your own concerns or responding to concerns raised by a third party or disclosed to you by a child / adult at risk? (circle / highlight as appropriate)		
My Own	Child / Adult at Risk	Third Party Concern*

Details of Third Party* (e.g. parent, coach, volunteer, official, etc)	
Name:	
Relationship to Child / Adult at Risk:	
Email:	
Contact number:	

Details of Child / Adult at Risk	
Name:	
Date of Birth:	Gender: Male / Female / Unknown
Branch/Centre:	
Membership Number:	
Have the parents / guardians been notified of this incident? (circle / highlight as appropriate) Yes No	
If yes, please provide details of what was said and what action agreed.	
Parent / Guardian Name:	
Contact number:	
Email:	
Address:	

Details of Person Involved (whom allegation has been made against)	
Name:	
Date of Birth:	Gender: Male / Female / Unknown
Role within The Pony Club:	
Contact number:	

<b>Email:</b>	
<b>Address:</b>	
<b>Accreditation &amp; Qualifications</b> <i>Include details of disclosure check, safeguarding, first aid, CPD and association with other BEF member bodies, as appropriate.</i>	

<b>Details about the Concern / Incident</b>
<b>Dates or period of incident / concern:</b>
<b>Full details of the incident / concern:</b> <i>Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.</i>
<b>Action taken:</b> <i>Include description of action and communications, dates, persons involved, etc.</i>

<b>Details of Witnesses (where applicable)</b>
<b>Please provide details of any witnesses:</b> <i>Include full name, contact details and email, etc.</i>

<b>Details of Statutory Agencies (where applicable)</b>
<b>If the incident / concern been reported to any external agencies (e.g. Police, Social Care Services or LADO) please provide details:</b> <i>Include name of agency, details about the person you spoke to (name, title / role, ID number), contact number, email.</i>
<b>Agreed action / advice given:</b> <i>Include all communication with external agency, and the advice and action given.</i>

<b>Print Name:</b>	<b>Signed:</b>	<b>Date:</b>
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**Send completed forms to:**  
**For the attention of** The Pony Club Safeguarding Team    Email: [safeguarding@pcuk.org](mailto:safeguarding@pcuk.org)

## Appendix 6 – Conversation Reporting Form

This form should be completed to record the details of any conversation regarding concerns raised at a Branch/Centre. A copy **must** be sent to The Pony Club Safeguarding Team, along with the incident report form. This form should be completed for disclosures raised by a child/adult at risk or when the concern is reported to statutory agencies. This document should be kept **confidential** when completed.

Case File Details	
Date/Time of conversation:	
Branch/Centre:	

Telephone Caller Details	
Your name:	
Caller's name:	
Telephone number:	
Additional information	

Call Summary
<b>Details of the conversation:</b> <i>Include details of concern and any other relevant information</i>
<b>Action taken / advice received:</b> <i>Include description of action and communications, dates, persons involved, etc.</i>

Print Name:	Signed:	Date:
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Send completed forms with the incident report form:  
For the attention of The Pony Club Safeguarding Team Email: [safeguarding@pcuk.org](mailto:safeguarding@pcuk.org)

## **Section 7: List of Related Policies and Guidance**

The policies and guidance listed in below are The Pony Club policies relevant to safeguarding. These are referred to throughout the Safeguarding Policy document and are available to download from the website.

- **Codes of Conduct** (for Members, Parents/Guardians, Coaches and Officials/Volunteers/Staff)
- **Whistle blowing**
- **Complaints Resolution**
- **Equality & Diversity**
- **Social Networking and the Digital World**
- **E-safety**
- **Photography**
- **Alcohol & Drugs**
- **LGBTQ+**
- **Child Employment**
- **Combatting Terrorism**
- **Mental Health**
- **Good practice in keeping yourself safe**
- **Safeguarding for young equestrians**

Additional safeguarding guidance and useful information can be found [here](#).