

# **RACECOURSE GUIDANCE DOCUMENTS**

## **SAFEGUARDING**

### **1. What is Safeguarding**

Safeguarding is about ensuring that any young person (aged under 18) or adult at risk<sup>1</sup> can participate in identified activities in a safe and positive environment where they are protected from any situation or practice that results in them being physically or psychologically damaged.

Racecourses have a legal obligation to ensure that when children and vulnerable people attend events at the racecourse or are employed by the racecourse, measures are in place to ensure they are looked after, with any specific needs being met.

### **2. Safeguarding Policy**

In line with BHAGI, racecourses must develop and implement a safeguarding policy, which as a minimum must include:

- a) a statement setting out the Racecourse's commitment to protecting all children and adults at risk;
- b) what the Racecourse will do to keep children and adults at risk safe and respond to concerns;
- c) a list of the supporting procedures that accompany the policy; and
- d) reference to the BHA Safeguarding Policy and reporting processes available from the BHA website – <https://www.britishhorseracing.com/regulation/safeguarding/>

The RCA has worked with SAFEcic to develop a template, which has been utilised and adapted by ARC for all racecourses and details our own policies and procedures.

It is recommended that Safeguarding is a standing item for each Racecourse Board meeting; that each Racecourse Board support the implementation and regular review (annually as a minimum) of the Safeguarding Policy; and that they are informed as and when any serious concerns arise e.g. staff allegations. All other concerns may be reported but without disclosing any identifying information.

In conjunction with the Safeguarding Policy, racecourses should conduct a Safeguarding risk assessment, including, but not limited to the issues outlined in Section 5 below. This should take account of any particular family/child focussed events at the racecourse and be kept under regular review.

### **3. Designated Safeguarding Lead**

Each Racecourse must appoint at least one senior member of staff as its Designated Safeguarding Lead (DSL), and this person will be a named person on the BHA Racecourse Licence. This does not need to be a newly created position and can be incorporated into an existing role.

The DSL should be a member of the senior management team, who will have ultimate responsibility for safeguarding issues, and may be the Executive Director, General Manager or premises licence holder.

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<sup>1</sup> An adult at risk is defined as any person aged 18 years and over who (i) has a need for care and support and (ii) is experiencing or is at risk of abuse and neglect and (iii) as a result of those care needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect

One or more deputies to the DSL may be appointed, and it may be appropriate for racecourses to consider whether the catering manager, Staffing Manager, Safety Officer, Stable/hostel manager, Clerks of the Course and/or Operations Manager may be suitable deputies, as these roles are likely to have responsibility for areas where young people may be working.

In line with the requirements of BHAGI, each DSL and any Deputy DSL shall:

- be DBS checked (to the highest level of check for which they are eligible);
- be trained in the safeguarding of children and adults at risk, such training to be refreshed as appropriate;
- be given a job description that properly records their responsibilities;
- at least one of the DSL or Deputies must be present and/or accessible for every race day, including when participants have booked to stay overnight ahead of the race day

Each DSL must have a clear job description, and it is recommended that this include as a minimum;

- oversee and ensure that the safeguarding policy is fully implemented
- leadership on safeguarding at the Racecourse;
- ensuring strict compliance with the Racecourse's policies and procedures for the safeguarding of children and adults at risk;
- reviewing and approving the safeguarding measures for all activities that take place at the Racecourse;
- be the point of contact for any report, suspicion of abuse or concern relating to the welfare of children or adult at risk at the Racecourse;
- be the lead Racecourse Official in any investigation of allegations of abuse of children or adult at risk, or other safeguarding concerns;
- provide guidance to and support for any member of staff engaged in each activity who reports suspected abuse of children or adults at risk or concerns as to their welfare; and
- be responsible for maintaining clear, comprehensive and up-to-date records of all reported allegations of abuse or poor practice.

#### **4. Communication**

Communication of the Racecourse's Safeguarding policy is key. The policy should be clearly communicated to racegoers and any other members of the public attending an event at the racecourse. This can be achieved via the racecourse website and Terms and Conditions of Entry.

The policy should also be shared with members of staff via their Induction procedure. SAFE has provided some Good Practice guidelines which can be provide to all members of staff who come into contact with children, young people and adults at risk. This can be provided individually or incorporated into the handbook provided to all staff.

All employed by the racecourse should be provided with details of who to contact if they have a Safeguarding concern. Racecourses will need to consider their reporting structure ensure that staff receive the details of the most appropriate and accessible contact. This information can be provided in a number of ways, such as via the staff handbook, signage in staff areas or labels with the appropriate details attached to the back of ID provided to each member of staff.

Suitable measures should then be taken to implement the policy and ensure that clear processes and procedures are in place.

#### **5. Issues for Racecourses**

In conjunction with the RCA Safety Group, RCA Technical Group, SAFE, the BHA, and other industry partners, the RCA has developed below a non-exhaustive outline of key issues which racecourses may wish to consider in developing their safeguarding policies and procedures, and some practical tips on implementation.

- **Overnight Accommodation** – So far as is reasonably practicable, any under 18-year-old staying overnight MUST be provided with a single room, even if they are travelling with someone from the same yard. Each racecourse should identify whether they can accommodate U18s appropriately and include this within their policy. If you cannot provide suitable accommodation at some or all fixtures this must be clearly stated, so that trainers are aware U18s cannot be accommodated before sending staff. Trainers have been advised to carefully consider whether it is appropriate for a member of their staff who is under 18 to travel overnight, and obtain parental consent where this is the case. Trainers have been reminded of their responsibilities to book overnight stabling and accommodation in advance. Where this is not done, it is imperative that racecourses report this to the stewards. Where racecourses do provide overnight accommodation for under 18s, they should be aware of the BHA's Guidance in relation to overnight accommodation and young people.
- **Jockeys Changing Facilities**
  - So far as is reasonably practical, separate changing facilities and showers should be provided for jockeys under the age of 18. It is recognised that in many instances this will not be achievable, and racecourses should consider other appropriate adjustments – for example, can a temporary partition or curtain be used to create a private area within the existing facilities.
  - Where racecourses provide one sauna for use by both male and female jockeys, any person using the sauna must be required to wear appropriate swimwear. Clear signage to this effect must be displayed, and any jockey who does not comply should be reported to the Stewards.
  - Separate changing facilities are already available for male and female jockeys, and racecourses should continue to work with their BHA Inspector of Courses to ensure these facilities are appropriate and meet the needs of jockeys.
  - The provision available to female jockeys in the changing facilities is an issue of equality rather than safeguarding. Racecourses should proactively engage with ongoing Industry initiatives in conjunction with the BHA and PJA to examine and enhance the provision for female jockeys as appropriate.
- **Third party contractors** - Racecourses must ensure that they confirm with any third party contractors that they have safeguarding policies and procedures in place where the activities of the third party contractors in question concern children or adults at risk in any way, or otherwise give rise to safeguarding considerations, and that these policies and procedures are communicated to the staff provided by the third party. Where these staff have any safeguarding concerns, they should be able to approach the racecourse DSL and/or deputies regarding these. Racecourses should support catering and gambling partners in their policies towards children and vulnerable adults.
- **Lost Children** - Further to consultation with the RCA Safety Group, an example procedure has been developed for racecourses.
- **Disclosure and Barring Service Checks** – Any other racecourse employee, including volunteers, who works with children or vulnerable adults, must undergo a Disclosure and Barring Service (DBS) check or equivalent. Details of most roles which will require a DBS check are included within the DBS Guide to Eligibility, but this document is not exhaustive, and if you are unsure whether a role should include a DBS check, you should contact the DBS for clarification. The arrangements in Scotland differ from those for England and Wales, where checks are obtained from Disclosure Scotland. Further

guidance on conducting DBS checks is available from RCA Medical Guidance Document 3.5 and the SAFEcic website

- **Childcare Facilities** – Where racecourses provide on-site childcare facilities (such as a nursery or creche), these are subject to further regulation.
- **Apprenticeships** – Where apprenticeships, or other schemes are run in conjunction with educational establishments, those establishments will have their own safeguarding policies and requirements, which will be regulated under the appropriate legislation. Racecourses should liaise with these organisations accordingly.
- **Racing to School/Pony Racing** – racecourses should undertake appropriate risk assessments for all activities for children and vulnerable adults (e.g. Racing to School days or Pony Racing).
- **Non-Racedays** – Racecourses host a number of non-raceday events which may be attended by young people and/or adults at risk. For these events, racecourses should conduct a Safeguarding Risk Assessment, in line with their safeguarding policy. Where the event is organised by a third party, the racecourse should require them to undertake this risk assessment and provide a copy to the racecourse in advance.
- **Hotel Accommodation** – Where racecourses provide on-site hotel/hostel accommodation available to the public, they must ensure that the Safeguarding risk assessment takes account of any relevant potential safeguarding issue (e.g. child trafficking), and that staff are aware of these and know how to raise any concerns. Where the accommodation is a franchise, operated in conjunction with a third party, the racecourse should confirm with this third party who will be responsible for these processes.

## 6. Training

As members of the RCA, racecourses can access SAFE's online training, Standard Child Safeguarding. This is recommended for the DSL and their deputies, along with any others who may contact social services or the police if they had a concern. There is a 50% reduction in the normal training courses price, with the discount code of RCA2019.

Where racecourses would like to give all staff a wider general overview of safeguarding, the BHA has developed an 'Introduction to Safeguarding in the Horseracing Industry', further details of which are available from the BHA website – [click here](#)

Further to the above ARC have access to an online safeguarding training course through ELiberty. Access to this can be provided by the local HR representative. All staff who come to work for ARC are required to complete this training during their induction period as a matter of best practice.

## 7. BHA Safeguarding Policy

The BHA has developed a Safeguarding Policy to put in place practical measures, tailored to the requirements of racing, that seek to minimise the risk of harm, and enable the BHA to respond to suspicions and concerns whenever and wherever they may arise. Racecourses will need to ensure they include reference to the BHA Safeguarding Policy and reporting processes within their own safeguarding policies.

The BHA have outlined the following key principles that will guide their approach to safeguarding young people and vulnerable adults:

- Where a young person or adult is being abused or is at risk of being abused the most appropriate body to address such concerns will typically be the social care team at the relevant local authority.
- The BHA will work in partnership with any appropriate authority to enable them to carry out their statutory duties to investigate concerns and protect people at risk.
- The BHA provide appropriate support to stakeholders in racing to improve their safeguarding policies and practices, with a view to achieving high safeguarding standards across racing.
- The BHA will take all allegations of abuse seriously and respond swiftly and appropriately.
- The BHA will challenge conduct within racing that is, or might be, harmful to young people or adults at risk.
- The BHA will support all of those involved in safeguarding cases.

The BHA has asked that any referral of an allegation or incident of suspected abuse of, or of poor practice towards, a child or adult at risk, is also reported to the BHA Safeguarding Team at [safeguarding@britishhorseracing.com](mailto:safeguarding@britishhorseracing.com) or via RaceStraight.m. There is no requirement to make a report to the BHA, but if a racecourse feels it is appropriate to do so, they MUST have prior approval from the relevant external agency. On a need to know basis.

Where approval for referral is provided, the report should be made to the BHA Lead Safeguarding Manager / Safeguarding Officer in line with Section 5 of the BHA's Safeguarding Policy – [click here](#).

## 8. Further Information

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| <b>SAFEcic</b>        | <a href="https://www.safecic.co.uk/">https://www.safecic.co.uk/</a><br>01379 871091<br><a href="mailto:help@safecic.co.uk">help@safecic.co.uk</a>   |
| <b>Racing Welfare</b> | <a href="https://racingwelfare.co.uk/">https://racingwelfare.co.uk/</a><br>0800 6300443 (24 Hour Helpline)<br>07260 079043 (Text line)<br>01638 560763 (Main Office)<br><a href="mailto:info@racingwelfare.co.uk">info@racingwelfare.co.uk</a>        |
| <b>BHA</b>            | <a href="https://www.britishhorseracing.com/regulation/safeguarding/">https://www.britishhorseracing.com/regulation/safeguarding/</a><br>07826 552393<br><a href="mailto:safeguarding@britishhorseracing.com">safeguarding@britishhorseracing.com</a> |

## **GUIDANCE IN RELATION TO OVERNIGHT ACCOMMODATION AND YOUNG PEOPLE**

The following guidance is issued in accordance with the BHA's Safeguarding Policy, under which the BHA is committed to issue guidance in relation to safeguarding/child protection issues. This guidance seeks to further the fulfilment of that commitment by promoting good practice across racecourses and trainers when placing young people (i.e. under 18s) in overnight accommodation:

- Racecourses and trainers should appoint at least one readily contactable individual who young people can contact should any problems arise during an overnight stay - that person should ideally be onsite, or otherwise immediately contactable by phone.
- Accommodation should have (i) separate sleeping facilities for males and females, and (ii) secure washing facilities. Reasonable adjustments should be made with due regard for any individual's particular circumstances, where required.
- Where it is necessary for people to share rooms, careful consideration should be given as to who is sharing with who, taking into account such things as the relevant individuals' age and maturity, and any special requirements any individual might have. Adults should not generally share a room with under 18s, and nobody should share with anyone who is not previously known to them. Everyone sharing a room should be comfortable with the sharing arrangement, and have explicitly said so.
- Racecourses and trainers should ensure that adequate procedures are in place in relation to emergencies, such as fire or medical emergency.
- Trainers should obtain written parental/carer consent in relation to under 18s for overnight stays (this could be sought on a blanket basis – for example at the commencement of employment - or in relation to each stay), and parents/carers should be given sufficient detail about every stay, including the date and duration of each stay, travel arrangements, details of the accommodation, and emergency contact details.
- Under 18s:
  - should not be left in accommodation alone overnight;
  - should be allocated their own individual bed; and
  - should have rooms that are lockable, but accessible in the event of an emergency.
- Trainers and racecourses should set very clear guidelines on the level of behaviour expected by under 18s during overnight stays, including (for example) not smoking, drinking or using recreational drugs, and in relation to the appropriate use of accommodation facilities and the consideration of others. A copy of these guidelines should be provided to under 18s and be available and displayed onsite.
- Trainers and racecourses may wish to analyse their insurance policies to ensure that appropriate cover is in place in relation to the provision and use of overnight accommodation.
- The specific circumstances of any overnight accommodation should be carefully considered to determine what further, specific measures are appropriate in order to protect young people and ensure a safe stay.

## RACECOURSE GUIDANCE DOCUMENTS

### EXAMPLE LOST CHILD/VULNERABLE PERSON PROCEDURE

**In the event that a lost child/vulnerable person is identified, the following procedure should be followed:**

- Two stewards (preferably one male and one female) with appropriate safeguarding training should accompany the child/vulnerable person to The Racecourse Office. Bear in mind that the child/vulnerable person may be frightened, and offer some reassurance
- The child/vulnerable person should remain in the Racecourse Office with supervision from at least two adults (preferably one male and one female) at all times until their parent/guardian/carer is located.
- White wristbands can be provided to children/vulnerable persons on arrival, on which the parent/guardian/carer can write their mobile phone number. If an wristband has been provided, call the number given and inform the parent/guardian/carer that the child/vulnerable person has been found and taken to the Racecourse Office.
- If no wristband has been provided, ask the child/vulnerable person if they know the name and/or telephone number of their parent/guardian/carer. Put out a call for that person via the public address system, advising them to go to the racecourse immediately.
- If the parent/guardian/carer does not arrive at the Racecourse Office, conduct a search in order to locate them.
- If the parent/guardian/carer cannot be located within 30 minutes of the lost child being first found, the racecourse management must be informed by calling 07970 828757, and they will then take the decision whether to continue to attempt to locate the parent/guardian/carer or to telephone the police.

**In the event that a child/vulnerable person is reported missing, the following procedure should be followed:**

- The parent/guardian/carer should be accompanied to the Racecourse Office. Bear in mind that they will be worried and offer some reassurance.
- The parent/guardian/carer should remain in the Racecourse Office with a member of staff at all times until the child/vulnerable person is located.
- The parent/guardian/carer should be asked to provide a detailed description of the missing child/vulnerable person, including, age, height, hair colour and what clothes they were wearing.
- The designated safeguarding lead, who has appropriate training, should be informed that a child/vulnerable person has been reported missing. They will then put out a radio call to all staff informing them of this, providing a description of the child/vulnerable person, and advising that any adults leaving the site with children should be challenged, until further notice.
- A call for the lost child/vulnerable person MUST NOT be put out over the public address system
- A thorough search should take place in order to locate the child/vulnerable person
- If the child/vulnerable person has not been located within the timeframe below, the designated safeguarding lead should contact the police  
Under 5's = 10 minutes, 5-10's = 20 minutes, over 10's = 30 minutes.  
Judgment will be made at the time as to the vulnerability of any adult at risk who goes missing.
- If the child/vulnerable person is located, the designated person should inform all staff of this, and inform them that it is no longer necessary to challenge adults leaving the site with children.