



Safeguarding Policy

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V1	Apr 2024	Policy re-written and amended
V2	Apr 2025	Tweaked details
V2.01	May 2025	Changed personnel for DSL and DDSL All parents/guardians/swimmers (under 18) to sign, agree and abide code of conduct.
V2.02	Jun 2025	Updated Swim England safeguarding contacts updated, inline with the Wave Power changes
V2.03	Sep 2025	Key Contacts changed and updated. Included separate contacts for Active Swim, Rickmansworth Swimming Club and Swim Education. All merged into one. Also, reference to Keeping Children Safe in Education, September 2025. Additional text changes are in red.
V2.04	Oct 2025	Page 4 - changes to safeguarding matters and relevant complaints made to the appropriate designated responsible body of the relevant school.

Important Contacts:

Active Swim and Swim Education

Designated Safeguarding Lead (DSL)	Scott Machen M: 07780 671515 E: opsmanager@rickmansworthswimmingclub.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Sue Moussa E: info@activeswim.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Louise Collins E: welfare@rickmansworthswimmingclub.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Hamid Anwary M: 07403 450972 E: Hamd@activeswim.co.uk

Rickmansworth Swimming Club

Welfare Officer / Designated Safeguarding Lead (DSL)	Louise Collins E: welfare@rickmansworthswimmingclub.co.uk
Deputy Welfare Officer	Alex Peters E: welfare@rickmansworthswimmingclub.co.uk

Police	Emergency: 999 Non-emergency: 101
NSPCC Helpline	0808 088 5000

Swim England	Pavilion 3, SportPark, 3 Oakwood Drive, Loughborough University, Leicestershire LE11 3QF W: swimming.org Safeguarding and Welfare Team T: 01509 640 700 (Option 1 for Swim England and then Option 5 for Safeguarding) E: safeguarding@swimming.org
Hertfordshire Safeguarding Children Partnership (HSCP) and LADO Contact:	0300 123 4043 https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html

Buckinghamshire Safeguarding	01296 382 070
LADO Contact:	LADO - Buckinghamshire Safeguarding Children Partnership

Richmond upon Thames & Kingston upon Thames Achievement for All	07774 332675
LADO Contact:	LADO@achievingforchildren.org.uk

Safeguarding Policy

Section 1: Introduction

Active Swim abides by the duty of care to safeguard and promote the welfare of children and young people. It is committed to safeguarding practices that reflect statutory responsibilities and government guidance and comply with best practice requirements.

- We recognise the welfare of children is paramount in all the work we do and in all the decisions we take
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have an equal right to protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare.
- Under no circumstances should any staff member or volunteer inflict physical or psychological harm on a child.
- This policy fully adopts the Swim England Wave Power as an affiliated swim school of Swim England.
- This policy applies to anyone working on behalf of Active Swim, **Rickmansworth Swimming Club and Swim Education**, including senior managers, paid staff, volunteers, sessional workers, casual staff and students. Failure to comply with the policy and related procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.
- **All safeguarding concerns will be treated with seriousness. If a safeguarding issue or formal complaint arises, it will be referred to the designated safeguarding lead (DSL) at the relevant school where the swimming activity takes place. For example, if a concern is raised at Rickmansworth, the DSL at Rickmansworth School will be notified.**

Purpose:

Active Swim, **Rickmansworth Swimming Club and Swim Education** will:

- Protect children and young people who receive swimming lessons – provided by Active Swim free from harm.
- Provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.
- This policy applies to children and adults at risk.

Active Swim and Swim Education will also ensure staff have:

- **Read and understood Appendix A of the Keeping children safe in education 2025**
- **Liaise with the Headteacher and/or Designated Safeguarding Lead of the institution, where relevant safeguarding concern meets the threshold within their organisation.**

The key principles of 'Working Together to Safeguard Children 2023' are that:

- safeguarding is everyone's responsibility and
- a child-centred approach is essential – defined as under individual under the age of 18 years of age.

An Adult at Risk is an individual aged 18 years and over who:

- has needs for care and support https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html or (whether or not the local authority is meeting any of those needs); and
- is experiencing, or at risk of, abuse or neglect; **and**
- as a result of those care and support needs is unable to protect themselves from **either**

- the risk of, or the experience of abuse or neglect.

All three requirements must be met in order to be considered an Adult at Risk. The local authority (Hertfordshire), health services, and the Police have specific responsibilities imposed by law to provide additional protection from abuse and neglect to Adults at Risk.

The role of the Designated Safeguarding Officer (DSL)/Welfare Officer

The Designated Safeguarding Officer (DSL) role is essential in providing a first point of contact for children and adults within the organisation who have a safeguarding or welfare concern.

The Deputy Designated Safeguarding Officer (DDSL) role works alongside the DSL and can deputise for them. Typically, they will have received appropriate training proportionate to their role and is up to date, every three years.

For the purposes of this document – the DSL will be referred to, meaning in Rickmansworth Swimming Club is the Welfare Officer. The DDSL will be the Deputy Welfare Officer.

The core tasks of a DSL/DDSL include:

- raising awareness of and assisting the Organisation in implementing Wavepower;
- assisting the Organisation in putting plans in place for child and adult safeguarding;
- introducing themselves to Members (and if children, their parents/guardians) and ensure they know who to contact and how to access the safeguarding arrangements at the Organisation;
- being the first point of contact for staff, volunteers, children and parents/guardians for any issues concerning welfare and safeguarding;
- ensuring that all incidents are correctly referred to and reported in accordance with Wavepower;
- investigating to conclusion all welfare complaints raised to the Organisation;
- acting independently and in the best interests of any child or adult at the Organisation;
- ensuring that relevant Organisation Members, volunteers and staff have a Disclosure and Barring Service (DBS) check if appropriate and the opportunity to access appropriate safeguarding training. These must both be updated every three years;
- ensuring that Wavepower procedures for the safe recruitment of staff and volunteers are followed;
- being aware of, and have a note of contact details of Police, Local Authority Designated Officer (LADO), Multi Agency Safeguarding Hub (MASH) Team, Adult Social Care, safeguarding partners, and the Swim England Safeguarding and Welfare Team;
- ensuring the Organisation has Codes of Conduct in place for staff, volunteers, coaches, competitors and parents/guardians;
- ensuring confidentiality is maintained and information is only shared on a 'need-to-know' basis; and reporting to (where appropriate) and advising the Organisation's committee or management on issues of safeguarding.

The Disclosure and Barring Service (DBS)

The Disclosure and Barring Service (DBS) enables Swim England to make an informed recruitment decision around an individual's suitability to work with children and adults at risk. The Managing Director, in conjunction with the DSL, will be responsible for coordinating the DBS checks for Active Swim as part of the safer recruitment procedure.

It is a requirement that any individual in England and Wales applying to be appointed or appointed to a role involving any Regulated Activity complete a Barred List Check. All

Members shall participate in and comply with the procedures of the DBS and its checking services in relation to safeguarding matters and any subsequent procedures by Swim England.

Any individual who wishes to work with children or adults at risk is required to undertake a DBS check, which is to be renewed every three years. The minimum age for a DBS check is 16 years old. An enhanced check will be required for all staff members.

Enhanced disclosure with barred list check

This is the highest level of check. The check is a legal requirement for any individual applying for a position which is considered as a 'regulated activity'. Eligibility for this check is not based on job title but is established by looking at the activities and responsibilities carried out by individual roles and depends on whether the individual will be working with adults or children. The check will show whether the individual is barred from working with individuals at risk. The DBS application process via Swim England will not allow you to request an enhanced disclosure with barred list check for a role that is not considered to involve regulated activity.

Approved training

From January 2024 all Swim England staff and volunteers who are required to complete safeguarding training for their role must complete the Swim England Safeguarding training course every three years. Other approved external courses will only be valid until their expiry. This workshop is delivered by a Swim England tutor, uses learning scenarios and references Wavepower throughout. Further details can be obtained from swimeducation@activeswim.co.uk for Active Swim Approved Training Centre

This training course is a bespoke course that has been designed specifically for aquatic environments.

Refresher training

Swim England offers a number of different themed modules for online refresher training. This online training is only suitable for individuals who have already completed the Swim England Safeguarding training.

Definitions

For the purposes of this Policy:

- **'adult'** means any individual aged 18 or older;
- **'Adult at Risk'** means an adult at risk as defined in the Care Act 2014
- **'child'** means any individual under the age of 18;
- **'Member'** means any individual participating in aquatics under the jurisdiction of Swim England, including but not limited to Swim England members, volunteers, staff, board members, coaches and teachers, swim school members, and parents/guardians of child members;
- **'Safeguarding and Welfare Team'** means Swim England's national safeguarding team, which may be contacted at safeguarding@swimming.org;
- **'Subject of Concern'** means an individual against whom a safeguarding concern has been raised with Swim England;
- **'Welfare Officer'** means any welfare officer for a Swim England club, county or region, or affiliated organisation;
- **'Organisation'** means any company, unincorporated association, organisation or body affiliated to Swim England by any means, including, but not limited to swimming clubs, swim schools, county associations, and regions; and
- **'Regulated activities'** means activities that the Disclosure and Barring Service can bar people from doing. It is a criminal offence for a barred person to seek to work, or work in, activities from which they are barred. It is also a criminal offence for employers or voluntary organisations to knowingly employ a barred person in regulated activity.

Section 2: Safeguarding children is everyone's responsibility

Everyone who works with children has a responsibility for keeping them safe; this includes **teachers, coaches and all who are employed or volunteer to work with children in the sport sector.**

No single person can have a full picture of a child's needs and circumstances, and if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Effective safeguarding requires clear local arrangements for collaboration between practitioners and agencies.

Child Centred approach to safeguarding

Effective safeguarding systems are child-centred. Failings in safeguarding systems are too often the result of losing sight of the needs and views of the children within them, or placing the interests of adults ahead of the needs of children.

In 'Working Together to Safeguard Children 2023', it states that children are clear about what they want from an effective safeguarding system:

- **Vigilance:** to have adults notice when things are troubling them.

- **Understanding and action:** to understand what is happening, to be heard and understood; and to have that understanding acted upon.
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping them.
- **Respect:** to be treated with the expectation that they are competent rather than not.
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation:** to be informed of the outcome of assessments, decisions and reasons when their views have not met with a positive response.
- **Support:** to be provided with support in their own right as well as a member of their family.
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views.
- **Protection:** to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee.

Duty of care

The Children Act 2004 places duties on a range of organisations and individuals to ensure their function and any services they contract out to others are discharged having regard to the need to safeguard and promote the welfare of children. Organisations have a duty of care to their Members. Paid and volunteer staff have a duty to be aware of their responsibilities for safeguarding and promoting the welfare of children, how they should respond to child protection concerns and make a referral to the local authority Children's Social Care, Police, Local Authority Designated Officer (LADO) or other agencies if necessary.

All those who work or volunteer directly with children and adults must ensure that:

- Members are treated with dignity and respect;
- good practice is promoted in order to reduce the possibility of abusive situations occurring;
- they continually reflect upon their own coaching, supervisory style, philosophy, and practices to ensure the safety and wellbeing of Members at all times and encourage others to do the same;
- they know and understand Swim England's Safeguarding Policies and Procedures contained in Wave power;
- they always work appropriately and openly with children and adults in the Organisation;
- they are an excellent role model, which includes not smoking or drinking alcohol in the company of children;
- they always put the wellbeing, health and safety of a member before all other considerations, including the development of performance;
- they build a balanced relationship based on mutual trust, which empowers members, including children and adults to share in the decision-making process; and they refer and address safeguarding concerns appropriately.

In addition, coaches and teachers must:

- keep their technical skills and qualifications up to date;
- complete a Disclosure and Barring Service (DBS) with a Barred List check upon commencing a new post and update that check at least once every three years;
- complete the Swim England Safeguarding course before the commencement of the role and attend a refresher course after three years;
- agree to and abide to the Active Swim's code of conduct for teachers/coaches;
- have open and regular communication with parents/guardians of child Members;
- ensure that activities are appropriate for a Member's age, maturity, experience and ability;
- promote honesty, teamwork and a good sporting environment;
- follow Swim England guidance on coaching children and adults;
- follow the guidance from their awarding body relating to coaching/teaching children and

- adults; and have respect for, and encourage, Members having a life outside of aquatics, and account for such where necessary.

Swim England coaches, teachers, officials and helpers must not:

- take children or adults at risk to their home or other secluded places where they will be alone. This includes changing room cubicles;
- engage in rough, physical or sexually provocative games;
- ever use physical force on a child or adult, for example hitting or slapping a member;
- share overnight accommodation with a child or adult at risk;
- allow or engage in any form of inappropriate touching;
- make sexually suggestive remarks to children or adults at risk;
- reduce a child or adult at risk to tears as a form of control;
- use physical exercise or any form of humiliation as a punishment to a Member, for example making a Member perform sit ups or press ups on poolside in front of their peers;
- Allow members to use inappropriate language or behaviour unchallenged;
- allow allegations made by a Member to go unrecorded or not acted upon;
- abuse their position of power or trust with children or adults;
- resort to bullying tactics or verbal abuse;
- cause a child or adult at risk to lose self-esteem by embarrassing, humiliating or undermining the individual;
- spend excessive amounts of time with one Member to the detriment of the squad/team;
- do things of a personal nature for children or adults at risk that they can do for themselves;
- engage in a sexual, including online or non-contact in nature, relationship with a child aged 17 or under; and
- give a lift to, or otherwise transport, an individual child (unless they are a family member) when unaccompanied.

Parents/guardian and swimmers (under 18 years of age) will:

- **sign, agree and adhere to the code of conduct (respectively for parents/guardian and/or swimmers, for children under 11, parents and guardians will collectively take responsibility) as appropriate.**

Definitions of abuse

Everyone involved in sport has a responsibility to be able to recognise and respond to signs and indicators of abuse and malpractice. In particular, each DSL/DDSL should be aware of the definitions of abuse and must ensure individuals who hold a position of trust within the Organisation are familiar with this information.

What is abuse and maltreatment of children?

All incidents of abuse and neglect are forms of maltreatment of a child.

Abuse is:

- Any action by another person that causes significant harm to a child.
- When someone fails to prevent harm to a child.

Who could abuse a child?

- A member of the child's family, a stranger, an acquaintance, or an institution.
- A fellow Member or a coach/teacher.
- An adult or a child.
- Peer on peer abuse.
- Anyone else.

Effect of abuse

- Abuse that is allowed to continue can be extremely damaging and can, if not responded to appropriately, cause problems for the person into adulthood.
- Present and future relationships can be affected as can trust in others.
- In some cases, abused children have become involved in drugs, alcohol abuse, criminality, suicide and, in extreme cases, they may go on to abuse other children.

Types of abuse

Physical abuse Physical abuse happens when a child is deliberately hurt. This can cause injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning or scalding, drowning or suffocating.	Physical abuse may also be caused when a parent/guardian, carer or other adult fabricates the symptoms of or deliberately induces illness in a child. An example of physical abuse may be the imposed use of performance enhancing drugs or persistent training, which is beyond the capacity of the individual leading to physical harm.
Emotional abuse Also referred to as psychological abuse, it is the ongoing emotional maltreatment of a child. Emotional abuse is persistent and, over time, it severely damages a child's emotional health and development.	It may include: <ul style="list-style-type: none">• making children feel that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;• not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate;• age or developmentally inappropriate expectations being imposed on children – for example, interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;• a child seeing or hearing the ill-treatment of another; and• bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. <p>In a sporting context, emotional abuse could include, but is not limited to, a coach who continuously criticises, uses sarcasm and/or name calling or who generally belittles the child.</p> <p>Parents/guardians can emotionally abuse a child by having excessively high expectations which places unrealistic pressure on the child, or by constantly giving the child negative feedback.</p>
Sexual abuse Sexual abuse can include, but is not limited to, forcing or enticing a child to	There are two different types of child sexual abuse. These are called contact abuse and non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. It includes:

<p>take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse.</p>	<ul style="list-style-type: none"> • sexual touching of any part of the body, whether the child is wearing clothes or not; • rape or penetration by putting an object or body part inside a child's mouth, vagina or anus; • forcing or encouraging a child to take part in sexual activity; and • making a child take their clothes off, touch someone else's genitals or masturbate. <p>Non-contact abuse involves non-touching activities. It can happen online or in person.</p> <p>It includes:</p> <ul style="list-style-type: none"> • encouraging a child to watch or hear sexual acts; • not taking proper measures to prevent a child being exposed to sexual activities by others; • showing pornography to a child; • making, viewing or distributing child abuse images (this can include taking images of a child when they are getting changed in the changing rooms); • allowing someone else to make, view or distribute child abuse images; • meeting a child following face-to-face or online sexual grooming, with the intent of abusing them; • sexually exploiting a child for money, power or status (child exploitation); • persuading or forcing a child to send or post sexually explicit images of themselves. This is sometimes referred to as 'sexting'; • persuading or forcing a child to take part in sexual activities via a webcam or smartphone; and • having sexual conversations with a child by text or online. • Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the child's friends and family unless they take part in other sexual activity. • Images or videos may continue to be shared long after the abuse has stopped.
<p>Neglect Neglect is a persistent failure to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development.</p>	<p>Neglect may involve failure to:</p> <ul style="list-style-type: none"> • provide adequate food, clothing and shelter; • protect a child from physical and/or emotional harm or danger; • ensure adequate supervision (including leaving them with unsuitable carers); • ensure access to appropriate medical care or treatment; • make sure the child receives a suitable education; • meet or respond to a child's basic emotional needs. <p>An example of neglect could be that a coach or officer fails to ensure the safety of a child by exposing them to undue cold or to unnecessary risk or injury. Neglect often highlights a failure to fulfil a duty of care.</p>

<p>Bullying Bullying is defined by the Anti-Bullying Alliance as: “The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online.”</p>	<p>It can cause considerable distress to children, to the extent that it affects their health and development or, in extreme cases, causes them significant harm (including self-harm). Children who suffer from bullying may often bully others in turn.</p> <p>Bullying can take a variety of forms, and often multiple forms simultaneously:</p> <ul style="list-style-type: none"> • Verbal: name calling, persistent teasing, mocking, taunting and threats. • Physical: any degree of physical violence including hitting, kicking and pushing. Intimidating behaviour, theft or the intentional damage of possessions. • Emotional: excluding, tormenting, ridiculing, humiliation, setting people up and spreading rumours. • Cyber: the misuse of digital technologies or communications to bully a person or a group, typically through messages or actions that are threatening and/or intended to cause offence, anxiety or humiliation. • Racist: bullying based on ethnicity, skin colour, and language, religious or cultural practices. • Homophobic and transphobic: bullying based on sexuality or gender identity. • Disablist: bullying children who have special educational needs and disabilities. • Sexual: unwelcome sexual advances, comments that intended to cause offence, humiliation or intimidation. • Discriminative: bullying based on any perceived weakness or difference. This could be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability or ability. It could also be factors surrounding the way someone looks or the clothes they wear, their family and social situation, hobbies and interests. <p>Bullying can occur between:</p> <ul style="list-style-type: none"> • An adult and child. • Children (peer on peer). • A parent/guardian and their own child. <p>The competitive nature of sport can create an environment which provides opportunities for bullying. Examples of bullying in our sports could be:</p> <ul style="list-style-type: none"> • a parent/guardian who pushes their child too hard; • a coach who adopts a win-at-all-costs philosophy; • a Member who intimidates others inappropriately; and • an official who places unfair pressure on a person. <p>Bullying in our sports could include a child being ostracised by others in their lane, squad or age group, refusing to talk to them and/or encouraging others to treat them with contempt.</p>
<p>Harassment</p>	<p>The National Website for Policing says that: Harassment may include:</p> <ul style="list-style-type: none"> • bullying;

<p>Harassment is a criminal offence and can be when someone repeatedly behaves in a way that makes you feel scared, distressed or threatened.</p>	<ul style="list-style-type: none"> • cyber stalking (using the internet to harass someone); • antisocial behaviour; • sending abusive text messages • sending unwanted gifts; and • unwanted phone calls, letters, emails or visits. <p>It's harassment if the unwanted behaviour has happened more than once.</p> <p>Sexual harassment is also unlawful, as a form of discrimination, under the Equality Act 2010.</p> <p>The Act says it's sexual harassment if the unwanted behaviour:</p> <ul style="list-style-type: none"> • violates your dignity; • creates an intimidating, hostile, degrading, humiliating or offensive environment (this includes the digital environment, online). <p>Some examples of sexual harassment could include:</p> <ul style="list-style-type: none"> • sexual comments, jokes or gestures; • staring or leering at your body; • using derogatory names such as 'slut' or 'whore'; • unwanted sexual communications, such as emails, texts or direct messages; • sharing sexual photos or videos; • groping and touching; • someone exposing themselves; and • pressuring you to do sexual things or offering you something in exchange for sex. <p>Some of these are also forms of sexual or indecent assault.</p> <p>Harassment should be reported to the Police, and referred the Swim England Safeguarding and Welfare Team using the referral procedure, see page 34.</p>
<p>Grooming The National Society for the Prevention of Cruelty to Children (NSPCC) define grooming as "when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked".</p>	<p>It is a criminal offence to cause or incite a child under 16 years old to engage in sexual activity. This can occur where a communication with a child causes or incites some kind of sexual activity by the child e.g. naked or semi-naked posing.</p> <p>It is also a crime for a person aged 18 or over to communicate with a child under 16 years old (who the adult does not reasonably believe to be 16 years old or over), if the communication is sexual or if it is intended to obtain from the child a communication which is sexual. Children can be groomed face to face or online, by a stranger or by someone they know.</p> <p>Groomers can identify as any gender and could be any age. They will hide their true intentions and may spend months or years gaining a child's trust and, in some cases, the trust of the child's family to allow them to be left alone with a child. Those who work with children may use similar tactics to gain the trust of the child and their colleagues.</p>

Online contact and communication with children

When an adult communicates with children, they must do so in an appropriate and safe manner, whether that is in person, by phone or text, online or via a social networking/messaging website.

Generally speaking, if you do not share your contact information with children, and take steps to make your social media accounts private, they will not find your phone number, email or social network site details. However, if this should happen and they are not disclosing concerns as outlined above, you must make them aware that you will not be communicating with them on this medium and inform the DSL/DDSL immediately. The DSL/DDSL will take action as required, ensuring contact by the Member is not repeated.

Mobile phones, social media, text messaging, email and other forms of electronic communication have become a regular feature of the sporting landscape and there is a need to define what is and what is not permissible when communication is required between adults and children.

Phoning, texting, emailing or messaging a child

Adults working or volunteering in any Organisation must not hold personal contact details belonging to children on any personal device, or be connected through any social media sites or apps. This includes apps such as WhatsApp where a child's number is displayed and visible to a group.

This is particularly important where any coach/teacher may hold a position of trust over a child. Adults working or volunteering in any Organisation can hold the phone numbers and email addresses of Members' parents/guardians with their consent, in order to provide information to Members. It is then the responsibility of the parent/guardian receiving any such messages to inform the child.

There are a number of team communication systems used by Organisations, which allow a 'non-position of trust' administrator(s) to ensure messages sent on behalf of coaches or teachers to children are copied in to parents/guardians, or are openly visible on a team feed, which allows instant messaging. They also include 'push notifications' for immediate attention of a recipient. Systems such as this can prevent direct messaging from a person in a position of trust, preventing suggestions of misconduct, protecting all involved.

In limited circumstances, it may be necessary for coaches, team managers or chaperones to have mobile phone contact details of the Members, for example at an away camp for safeguarding reasons. In such circumstances, the individual holding the contact details must be Disclosure and Barring Service (DBS) checked, have undertaken appropriate safeguarding training and have the consent of each Member's parent/guardian to temporarily hold that information for the purpose of the event. The Members' phone numbers must then be deleted as soon as possible after the event.

Apps or social media messaging which are not capable of storing messages, such as Snapchat, are NOT recommended in order to communicate with children, as they have limited safety functionality. Nor indeed are platforms that reveal children's numbers and online identities such as WhatsApp and Instagram.

Teachers and coaches aged 18 to 21

Swim England recognises that many young coaches and teachers aged 18 to 21 will have been Members themselves before becoming a coach or teacher and will be friends with their fellow Members, some of whom will still be aged 16 or 17. It is therefore plausible that they will have the personal contact details for those Members or be connected with them on social media

sites. Swim England accepts it would be inappropriate to require young coaches or swimming teachers to remove the details of those Members from their contact lists or social media profiles.

Therefore, if a coach or swimming teacher aged 18 to 21 has phone and/or email details for Members, or is connected to them on social media, who are aged 16 or 17 upon undertaking the role of coach or swimming teacher, Swim England does not expect them to remove those Members from their contact list, unless the coach or swimming teacher is the primary coach or teacher for any of the Members in question. The coach or teacher must inform the DSL/DDSL and the Head Coach (if applicable) that they hold these contact details.

Use of social networking

Swim England recognises that the use of social networking sites such as Facebook, X (formerly Twitter), Instagram, Snapchat, and TikTok, and instant messaging tools such as WhatsApp and Telegram, continue to grow rapidly and are used as the communication tools of choice by children.

Social networking sites provide a platform for uploading and viewing video clips, as well options for private messaging and public commenting. Whilst the ever developing technologies provide exciting opportunities for our Members, they are accompanied by dangers and negative consequences if abused.

If 'out of sport' inappropriate social media activity emerges, Members are encouraged to report this directly to the social media platform provider, or seek advice from the

Professional Online Safety Helpline.

Use of social media by coaches, teachers, staff and volunteers

As a coach, teacher or other employee or volunteer of the Organisation, you should not be in contact with children (unless a family member) through social networking sites if they are a Member of the Organisation you work or volunteer for.

Should a child in your Organisation request to become 'friends' via your personal social networking site, you should decline if:

- you are in a position of responsibility in respect of that child;
- you hold a position of trust and/or responsibility at the club; or
- your contact with the child is through a Swim England club and the parent/guardian of the child does not give their consent to such contact.

Social networks should never be used as a medium by which to abuse or criticise members or Swim England organisations and to do so may be in breach of Swim England Regulations.

The publishing of a photograph or video footage on any social networking site is governed by the same requirements as those contained in **"Photography of Members" in WavePower on page 94.**

Coaches, teachers and other staff who are under 18

Swim England recognises that social networking sites can be a useful tool for teachers, coaches and other staff within the Organisation to share information with other teachers, coaches or staff. If, however, the teacher, coach or staff member is under the age of 18, whilst they may be a colleague, it is essential to mitigate the risks of such sharing.

Swim England recognises that to restrict the ability to share professional information with them from other coaches, teachers or staff may be detrimental in their professional development of their role at a Swim England Organisation.

Therefore, if a parent/guardian of a child in a position of responsibility gives consent, and the child themselves request to have contact with an adult Member of staff for the purposes of sharing professional information relevant to their role, the Organisation must:

- gain written consent from the parent/guardian and young person to have such contact, naming the individual adult and social networking site concerned;
- ensure the named adult signs an agreement to keep contact with the child to the discussion of matters relevant to the child's role in the Organisation;
- ensure all such communications are shared with an identified third person (e.g. the child's parent/guardian or DSL/DDSL); and
- ensure that if the child or the adult is found to breach the above agreement, action is taken by the Organisation to address the concern and/or ensure that the breach is referred to Swim England or the statutory agencies if appropriate.
- If the parent/guardian does not consent, or the child does not themselves request to have such contact, the usual requirements in this policy must still be adhered to.

Guidance on indecent / child abuse images of children

Risks

Some people have tried, and succeeded in, taking images (video and still photographs) of children in the process of changing, in changing villages or under/over changing cubicles. Some people, only known to each other through the sport have shared these indecent images with others. 'Indecent' is not defined in legislation but can include an image of a child in a state of undress in the changing room.

These images can be used to isolate and embarrass a child amongst their peer groups, exploit them and, in serious cases, make demands of children to carry out acts against their wishes. Any use of these child abuse images, or indeed the threat of such, can have devastating consequences for any child. It can significantly affect the mental health and social interactions of children, including trust amongst a peer group. Once the image is in the public domain, it is difficult to control, to know who has seen it and what has been done with it. This can lead to feelings of paranoia and isolation at a time when teenagers in particular need to build up their self-esteem during a crucial stage of their development. The risks to victims, bystanders and perpetrators are different but all three contain a degree of risk that can leave a child in a vulnerable state and can significantly affect their future. It is vital that children understand the legal implications and the impact on others.

Swim England's evidence is consistent with earlier NSPCC research that girls are more adversely affected by the risks than boys – it is not a gender neutral practice.

Swim England has a zero tolerance policy towards the use of mobile phones and other digital devices in changing rooms during Swim England regulated activity. Please see "Safeguarding in changing rooms" in WavePower on page 82 for further details.

Criminal Acts

- It is a criminal offence to take, make, distribute (send), upload and/or possess any indecent image of a child (including those taken/possessed by other under 18-year-olds). It is also an offence to request a child to take, make, distribute or upload such an image, or encourage another to commit an offence.
- **'Making'** includes opening, accessing, downloading and storing online content. **'Sharing'** includes sending on an email, offering on a file share platform, uploading to a site that other people can access and possession with a view to distribute the image(s).
- An offence of **'voyeurism'** is committed if a person, for the purposes of their sexual gratification, observes or films another without their consent.

- It is an offence to send a message which is threatening, indecent, grossly offensive or false with intent to cause distress or anxiety.
- The offence of '**upskirting**' refers to an individual whom without consent operates equipment or records an image beneath a person's clothing to observe their genitalia or buttocks, whether covered or uncovered by underwear garments.
- The National Police Chiefs' Council (NPCC) does not support prosecutions of children for taking indecent images of themselves due to the detrimental effect this can have on them especially if they are convicted. The label of a 'sex offender' would be applied to a child convicted of such offences and could be detrimental to their future health, wellbeing and affect their future employment. The NPCC position differs if a child takes indecent images of others.

Types of criminal acts and course of action

All use of images as detailed above are criminal offences, and, if deemed to be an 'experimental' act, then Children's Social Care, the Multi-Agency Safeguarding Hub (MASH) The team and the Swim England Safeguarding and Welfare Team must be advised. If the act is deemed to be 'aggravated' then it must be reported to the Police, Children's Social Care and Swim England Safeguarding and Welfare Team.

Experimental

If the concern relates to a Member of the Organisation aged 13 or above who has voluntarily (with no suggestion of coercion/exploitation/threats, etc.) taken an indecent image of themselves, and then shared this with another individual they are in a relationship with, we will determine whether the act may be seen as experimental (e.g. for teenagers within a relationship this might not be seen as unusual behaviour).

In this case, parents/guardians should be informed that the concern will not be referred directly to the Police (in line with Child Exploitation and Online Protection Command (CEOP)/NSPCC guidance), but will refer the matter to the relevant Children's Social Care or the MASHTeam, for assessment by them. This may be done without parental consent (for example, if it is a criminal offence which may lead to significant harm). This is to ensure that professionals can make a suitable decision around supporting and guiding each child, based on any background and to help parents/guardians manage that behaviour. Where both parties (sender/recipient) are at the same Organisation, the DSL/DDSLs and other staff can also work with parents/guardians to monitor the children's behaviour to prevent recurrence in the environment of the Organisation.

The request to send an indecent image (child abuse image) is also an offence. If, however, a child aged 13 or over asks another child of the same age within a relationship context for such an image, without any aggravating factors (listed below), then the matter will be referred in accordance with the previous paragraph.

Aggravated

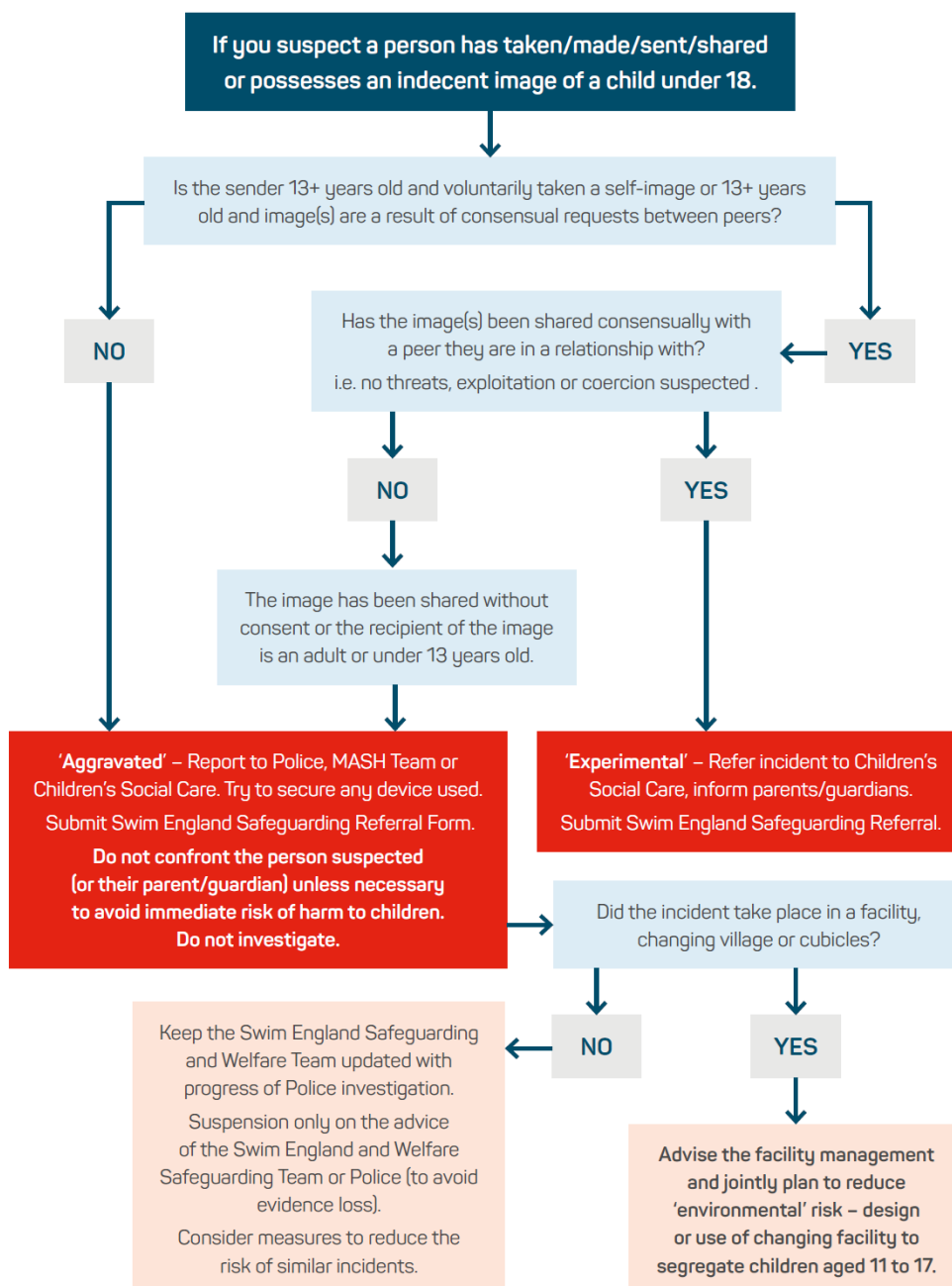
This term may be applied to any other situation not detailed above, such as incidents which include adult involvement and abusive or criminal behaviour by under 18s such as sexual abuse, extortion, threats or malicious conduct arising from personal conflicts. It also includes the creation, showing or sharing of images without the knowledge, or against the will, of the individual who is pictured (e.g. taking images under/over cubicles).

Aggravating factors to be considered also include:

- the age of the child (or children) involved;
- the circulation of images to peers, or with others they are not in a relationship with;
- the coercion or exploitation of a child by the use of rewards or threats to send/share the image;
- the number of 'victims' or repeat behaviour by any party;
- the wording or language which accompanies the image;

- the explicit or depraved nature of images beyond 'the norm'; and
- any other background information that may increase the risk of harm.

A request for an image under any of these circumstances can also be considered to be an aggravated act. In the case of an aggravated incident, the matter will be referred to Police and the MASH Team or Children's Social Care, by DSL/DDSLS or the Swim England Safeguarding and Welfare Team, according to local arrangement.



Action to be taken by the Organisation

A 'device' can include mobile phones, tablets, laptops, desktop computers, any type of camera or video camera, or any type of technology capable of taking, sharing or storing images or video footage.

Safeguarding children is paramount, if there is a strong suspicion that a device may contain an indecent image of a child then you should:

Keep any information limited to those who 'need to know'. Advise the Leisure Centre Duty Manager of the incident (if appropriate), if you are still at the location and the concern falls under the 'aggravated' category above, you must contact the Police.

Where the device is available, retain and secure the device if possible, and follow the reporting procedures. This includes reporting the act immediately to the Police, if necessary, in order to secure evidence and/or protect a child from harm. You must also inform the DSL/DDSL or Swim England Safeguarding and Welfare Team. If, for example, a child denies they have any such image on their device or refuses to hand over the device and you are confronting them shortly after the incident has allegedly taken place, they can be asked to produce the device ideally with two appropriate adults present. It is vital they do not get the opportunity to delete any images or data themselves.

Where the device is not available, or where an incident comes to light after the event, then an immediate referral should be made to the DSL/DDSL and Swim England Safeguarding and Welfare Team. If the incident takes place 'out of hours', and there are concerns that the image has been or will be shared, you should contact the Police.

Under no circumstances should you attempt to look at or send any potential indecent/child abuse images, or make any effort to store the potential images on another device or cloud storage service.

You must always seek advice from either the Police or the Swim England Safeguarding and Welfare Team, regarding the handling of any device that has been suspected of being used to take/make/send or contains an indecent image of a child under 18.

The absence of images being available to view on a device is not definitive evidence that an image hasn't been taken/made/sent or stored on a device.

Relationships with Members aged 17 and under

Relationship of trust

The Sexual Offences Act 2003 states: "It is an offence for a person aged 18 years or over to involve a child under that age in sexual activity where he or she is in a specified position of trust in relation to that child. This includes those who care for, advise, supervise or train children and young people."

Following lobbying by the CPSU and sports national governing bodies, the law now applies to coaches within our sports. Swim England has adopted this policy into Swim England's Codes of Conduct and the Swim England Code of Ethics, and any relationship of this nature may result in disciplinary action, as well as being reported to statutory agencies.

The power and influence a coach or teacher has in a professional relationship with a child cannot be underestimated. In addition to this, the child's success or failure and team selection may be dependent on the coach. It is vital for all coaches and teachers, as well as other volunteers, to

recognise the responsibility they have and ensure that they do not abuse that position of power and trust.

No sexual relationship should exist between Members under 18 years of age and their coach or teacher, and the relationship between coach or teacher and Member must be appropriate at all times.

Please note that whilst children aged 16 or 17 years can legally consent to sexual activity, in almost all provisions of legislation, such as the Children Act 1989, they are still classified as children.

The coach or teacher/Member relationship is a complex one for both parties. It is important that the coach acknowledges that children often develop feelings for people in positions of trust, often identified as 'a crush' or 'hero worship'. In the case of a sports coach, this may result in admiration of the coach's previous achievements, e.g. as a national level athlete or a representative of their country. If this should happen to you as a coach or teacher, always inform the DSL/DDSL to note the matter, and ensure that concerns are discussed and managed in an open and transparent manner. The DSL/DDSL will be able to advise you on how to manage the issue and any required actions. You and the DSL/DDSL will be able to deal with such situations ensuring you and the child are safe from harm or allegation.

Coaches or teachers may develop stronger relationships with some children than with others. It would be unrealistic not to acknowledge that it is possible to like one person more than another. However, the professional nature of the coach or teacher's position requires them to never favour one Member, or group of Members, over another. It may be that an individual Member requires more attention for reasons identified by the coach or teacher (e.g. the Member is preparing for a national level event) but such preferential treatment or extra attention must be justifiable as being necessary for a Member's development, and should not be to the detriment of other Members.

Some coaches have considered it acceptable to give rewards to Members who do well, and it is acknowledged that in the vast majority of cases, gifts were given with no ulterior motive other than to reward success or improvement.

However, the giving of gifts or favours can be identified or misconstrued as part of the grooming process. Individual coaches must not give Members gifts in any form. It is recommended that if a coach or teacher feels that a Member has attained a level of achievement that should be rewarded, then it is the Organisation that should recognise that, on the coach or teacher's recommendation, and that any reward, gift or recognition given is then from the Organisation and not one individual.

Where a coach does wish to carry out a rewards system, they must inform the relevant personnel within the Organisation to make them aware of this, and provide details of the infrastructure around it. This may protect the coach or teacher from potential allegations of favouritism or grooming. In all cases, the reasoning behind creating the rewards system, and the justification for awarding a reward to an individual should be done on an open and transparent basis, for the sake of all concerned.

Section 3: Reporting a concern about a child at risk of harm

All Members should be aware of how to report any concerns which they are aware of, however, it is especially important that DSL/DDSLs are aware of the reporting procedures for any child safeguarding concern.

Swim England is committed to ensuring that any child Member who attends a Swim England Organisation, event or activity will be safeguarded from harm. Protection and safeguarding of all of our Members is paramount and should be based on prevention and best practice. However, we recognise that not all risks can be removed and safeguarding concerns will continue to be raised both within, and outside of, any Organisation.

The following three stages of action must be taken for anyone who may have a concern or is made aware of a concern about a child Member's wellbeing:

Stage 1 – React to the concern, disclosure, suspicion or allegation in a timely and appropriate manner.

Stage 2 – Record the relevant information.

Stage 3 – Report the information to the appropriate person(s) and/or Organisation(s), subject to the above consent conditions being met.

You do not have to decide whether a concern or incident amounts to abuse or a failure to safeguard a child member. You do have to refer that concern to the Swim England Safeguarding and Welfare Team so they can make that decision. Anyone with a concern relating to Members in aquatics can contact the Swim England Safeguarding and Welfare Team for advice and guidance.

If you are experiencing, at risk of, or have experienced harm, or you are concerned that a child member is experiencing, at risk of, or has experienced harm, please contact the Safeguarding and Welfare Team for advice on **01509 640700** (Option 1 for Swim England and then Option 3 for Safeguarding) or at **safeguarding@swimming.org**. The Safeguarding and Welfare Team will be able to provide advice even if you are not making a referral or are unsure whether to do so. The online referral forms for both children and adults are available at:

swimming.org/swimengland/how-raise-concern-complaint

You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them.

You must not keep safeguarding concerns to yourself.

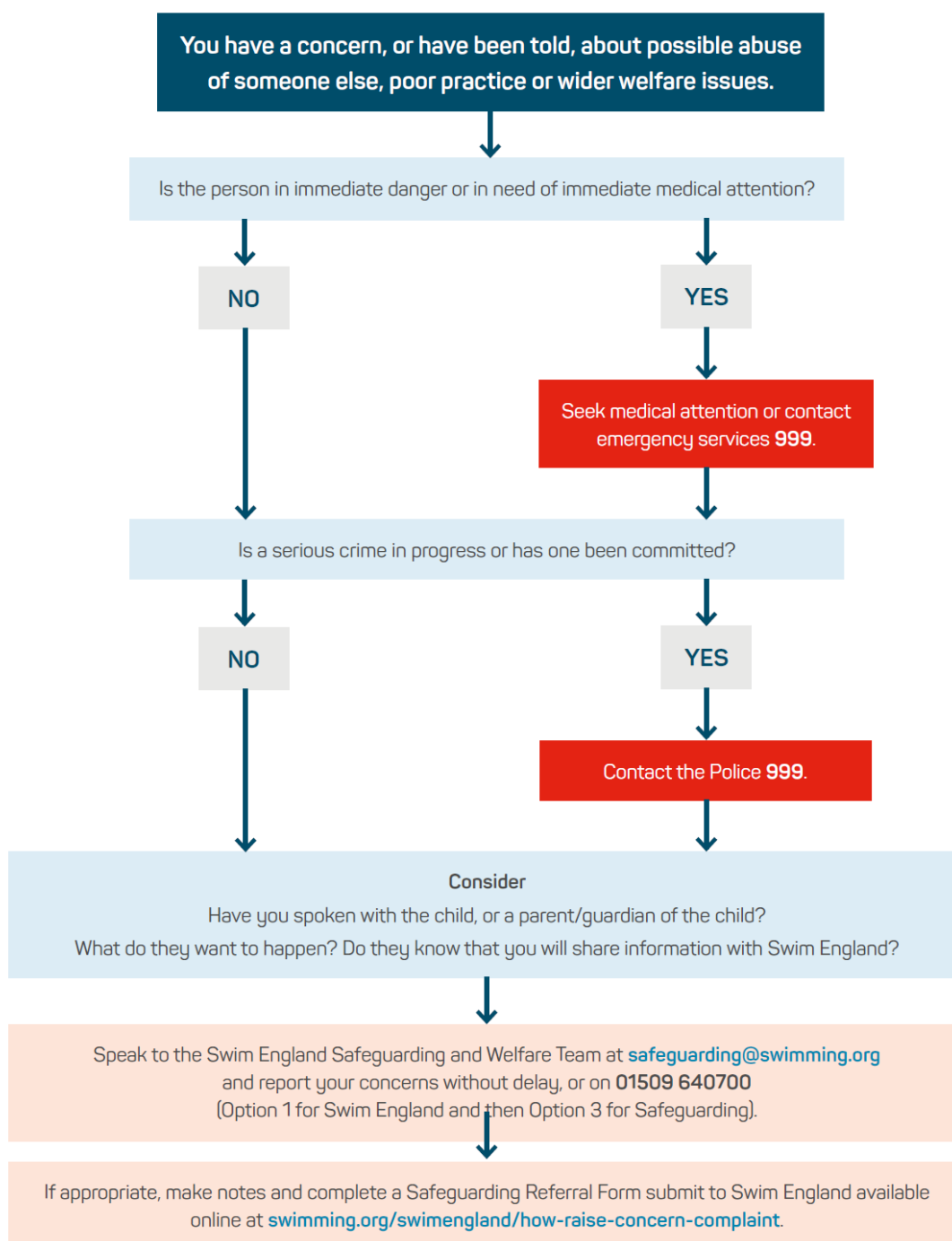
If you have concerns or you are told about possible or alleged abuse, poor practice or wider welfare issues you must contact your DSL/DDSL or the Swim England Safeguarding and Welfare Team as soon as you can.

If you are concerned about harm being caused to someone else, please be aware that:

- it is not your responsibility to prove or decide whether a child Member has been harmed or abused;
- it is, however, everyone's responsibility to respond to and report concerns they have using the Swim England safeguarding referral form;
- if someone has a need for immediate medical attention you must always call an ambulance on **999**;
- if you are concerned someone is in immediate danger or a serious crime is being committed, you must contact the Police on **999** straight away;

- if appropriate, discuss your concerns with the child's parent/guardian, and seek to understand what they would like to happen. Inform them that you have to pass on your concerns to your DSL/DDSL and Swim England Safeguarding and Welfare Team;
- do not contact the parent/guardian before talking to your DSL/DDSL or the Swim England Safeguarding and Welfare Team if the person allegedly causing the harm is likely to find out as a result; and
- do not confront the person thought to be causing the harm.

Responses from the DSL and DDSL to an allegation



Responding to a direct disclosure

If a child discloses to you that they are being harmed or abused, or you are a DSL/DDSL who receives information which gives rise to concern, you must:

- treat the disclosure seriously;
- remain calm;
- listen carefully to what is said, allowing the discloser to continue at their own pace;
- be sensitive;
- keep questions to a minimum, only ask questions if you need to identify or clarify what the person is telling you and do not ask leading questions;
- reassure the person that they have done the right thing in revealing the information;
- ask them what they would like to happen next;
- explain what you would like to do next in response to the concern;
- record in writing what was said, using the child's own words, as soon as possible, along with any actions taken or proposed.
- **report** to the information to the DSL or DDSL, as soon as practically possible.
- if you are a DSL/DDSL, act accordingly and swiftly, and
- explain that you will have to share the information with the Swim England Safeguarding and Welfare Team

You must not:

- dismiss or ignore the concern;
- make negative comments about the alleged perpetrator;
- make assumptions or speculate;
- come to your own conclusions;
- probe for more information than is offered;
- make promises that cannot be kept, including that you will keep the disclosure secret when you can not;
- conduct an investigation of the case yourself;
- confront the person thought to be causing harm;
- take sole responsibility for the concern; or
- tell anyone else about the concern who has no need to be made aware of it.

Staff allegations

If there are allegations against a member of the staff, then please contact the DSL/Managing Director. If this allegation is concerning a school staff member, this must also be reported to the Headteacher. If you cannot get hold, please contact the Local Authority Designated Officer (LADO) and Swim England, to which a referral will be made. If the allegation is about the DSL, then Swim England and the LADO should be contacted.

Safer Recruitment

Safer Recruitment in Wavepower applies to both voluntary and paid staff. All staff and volunteers for any Swim England Organisation must go through an appropriate vetting process prior to their appointment in order to establish their suitability to work with children and adults at risk. Active Swim will follow the Swim England Wavepower process.

Managing bullying

Swim England is committed to providing a caring, friendly and safe environment for all our Members so they can learn to swim or train in a relaxed and secure atmosphere. Bullying of any kind is unacceptable within our sports.

What is bullying behaviour?

The Anti-Bullying Alliance defines bullying as “**the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online**”. Active Swim will follow the Swim England Wavepower process.

Safeguarding in changing rooms

Our experience shows that incidents of sexual assault and the taking of indecent images still occurs in changing rooms. It is imperative all Members of the Organisation, including employees and volunteers, understand the individually harmful and legal consequences of a person being sexually assaulted, or having indecent images of them taken. Such behaviour is illegal and will not be tolerated in any form. We strongly recommend that Organisations engage locally with pool providers to create simple barrier systems, or make use of natural barriers between cubicles (e.g. lockers) to enable

mixed ‘changing villages’ to be used only as separate changing areas for either sex. Children of different sexes should change in separate areas, never in the same cubicle, or adjoining cubicles. This will help in preventing crimes involving covert use of cameras or phones.

! Mobile phones and devices should not be used under any circumstances in a changing room area during Swim England regulated activity. This should be supported by clear signage in changing rooms confirming a zero-tolerance approach to the use of mobile phones in changing areas.

All use of mobile devices in a changing room must be reported to the DSL/DDSL and venue.

Missing children

It is hoped that no child will ever go missing from an aquatics activity. If they do, remember most children are found within a few minutes of their disappearance. This policy must be followed if any child leaves a training session where the coach, teacher or those responsible for the activity do not know their location during the times the session is due to have run and where it is not confirmed that their parent or guardian is aware of their location. If a child for whom your Organisation has responsibility goes missing, the following actions should be taken.

- Ensure other young people are looked after appropriately while you organise a search for the missing young person.
- Inform the young person’s parents/guardians if they are present at the event, or nominate an appropriate person to telephone them and advise them of the concern. Reassure them that you are doing all you can to locate their child, asking for any information they may have.
- Either the parent/guardian or the Organisation should try and contact the child on their mobile phone.
- Divide up available responsible adults to search specific areas. It is best to take a short time to organise the search properly so that all places are searched fully.
- Search the area in which the child has gone missing, including changing rooms, toilets, public and private areas and the facility’s grounds.
- Request that all those searching report back to you or to a nominated adult at a specific location and time. Record who searched which areas.

- This nominated person should also be making a note of the events, including a physical description of the young person including approximate height, build, eye colour, hair colour and style as well as the colour, brand and type of clothing they were wearing, and where they were last seen, as this will be required by the Police.

If the search is unsuccessful you should then report the concern to the Police.

- The Police may recommend further action to be taken before they get involved; you should follow any guidance they provide.
- If the Police decide to act upon the concern, follow their guidance in respect of further actions to take, if any.

Late collection of children

Occasionally there may be times when the late collection of children is unavoidable, or parents/guardians may be delayed, or unable to collect their child from training, or after an event, on time. Parents/guardians should inform the appropriate officer of the Organisation if they are going to be delayed and come to an agreement with the Organisation on the best appropriate action.

If a parent/guardian arrives to collect a child and the officers are concerned at their ability to take appropriate care of the child (i.e. they are considered to be under the influence of alcohol or drugs) the Organisation should gain advice from the Police or Children's Social Care.

Emergency procedures

In the event that a child has not been collected at the expected time and no contact has been made by the parent/guardian.

Active Swim should:

1. Use the emergency numbers they have for the child to try to arrange for a nominated person to collect them.
2. If there is no answer from those contacts ask the child if they have contact numbers for any other family members who may be able to help.
3. If there is no reply or response from the above and after 20 minutes you are unable to contact anyone else the Organisation can seek advice from Police or Children's Social Care or Multi Agency Safeguarding Hub (MASH).
4. If the child has to be transported to a place of safety by an adult in an emergency situation it is recommended that two Disclosure and Barring Service (DBS) checked adults from the Organisation transport the child. In all cases the child must be seated in the back seat. Please see the Transporting Children section for further guidance.
5. Do not leave a child alone unless they are over 16 and parents/guardians have agreed with the Organisation previously that their child can make their own way to and from training.
6. Until a child is collected, to maintain the wellbeing of all concerned, two appropriate adults (ideally who holds a DBS check) or parents/guardians must remain with the child.

You must avoid:

- Asking the child to wait in a vehicle.
- Waiting with the child at the Organisation on your own.
- Sending the child home with another person without permission.

Repeated incidents

Parents/guardians who repeatedly fail to collect a child on time or who have not arrived after a reasonable period of time and have given no prior notice or informed the Organisation that they are going to be delayed may be failing in their duty of care to their child. The DSL and another Organisational representative should arrange to meet with the parent/guardian and discuss the matter. It may be that the parent/guardian can be assisted in arriving promptly. For example making arrangements with another parent/guardian. If the situation doesn't improve, the DSL should either contact the Swim England Safeguarding and Welfare Team, Children's Social Care or MASH Team for further advice.

Photography of Members

We recognise that parents/guardians and children generally welcome opportunities to celebrate or publicise their involvement and achievements when taking part in sport by photographing children at events.

Organisations may also want to promote their activities to encourage participation. Swim England does not advocate the banning of photography or the use of images and videos of children.

This section applies to all images and videos, which are not suspected of falling under the guidance on indecent/child abuse images of children, taken on any type of camera or recording device (including mobile/smart phones). It applies to all training sessions, activities and events run by an Organisation.

What are the risks?

Children may be identified, contacted or groomed. Including the child's personal information (full name, address) alongside their image can make them identifiable and therefore vulnerable to individuals looking to locate, contact or 'groom' children for abuse. Even if personal details are kept confidential, other details identifying the Organisation can also be used to groom the child.

There's increased risk of identification of, and contact with, a child: by someone in circumstances where there are legal restrictions – such as if the child is in local authority care or placed with an adoptive family; or where it's potentially dangerous to reveal the child's whereabouts to an estranged parent due to previous concerns about domestic violence. Someone might make inappropriate or illegal images of children.

Photo or video content may itself be inappropriate, or images may be used inappropriately or out of context:

- Some individuals deliberately target the aquatic sports and set out to take inappropriate photos in ways that are potentially illegal and harmful, such as:
 - › images of children changing;
 - › photos taken in the toilets; or
 - › using a camera at ground level to photograph up girls' skirts.
- Images that appear ambiguous can be used inappropriately and out of context by others (for example, images from behind a starting block, or children climbing in or out of the pool).
- Images can easily be copied and edited, perhaps to create child-abuse images.
- Images shared privately online can be re-shared, possibly entering the public domain on websites or social media.

Minimising the risks

Organisations benefit from using images of young Members to promote and celebrate activities, events and competitions. Some coaches also find it helpful to use photographs or videos as a tool to support a young athlete's skills development.

However, the use of photos and videos on websites and social media, and in posters, the press or other publications, can pose direct and indirect risks to children and young people if not managed correctly.

Organisations wishing to use or permit the use of images of children involved in their activities must, therefore, follow Wavepower to safeguard them.

The publishing of a photograph of a child Member, either on a noticeboard or in a published article or video recording (including video streaming) of a competition, must only be done with parental consent and consent from the child and in line with Wavepower. A parent or guardian has a right to refuse to have their child photographed. A child also has a right to refuse to be photographed. The exercise of this right of refusal should not be used as grounds for refusing entry into a competition. Therefore, any photo that may go to the press or on a noticeboard, be it through a Member of the Organisation or an official photographer, must receive appropriate consent before being published or displayed. In the case of any event or competition where the host Organisation has an official photographer or, for example, intends to stream the event or competition online, all parents/guardians and Members who are attending must be made aware of this in the event details.

If photos are to be published anywhere, each individual and/or their parent/guardian must be given the opportunity to withhold their consent. Their right to do so must be specifically drawn to their attention.

All photographs for publication must observe generally accepted standards of decency:

- Action shots should be a celebration of the sporting activity and not a sexualised image in a sporting context.
- Action shots must not be taken or retained where the photograph reveals a torn or displaced swimming costume.
- Poolside shots of children must be above the waist only in a swimming costume.
- Full length shots are permitted if the children are fully clothed.
- Photographs must not be taken from behind the starting blocks or that show children climbing in and out of the pool.
- Published photographs may identify the individual by name and Organisation but must not state the Member's place of residence or school attended.
- Swim England does not wish to stop parents/guardians photographing their child if they wish, but all Organisations must ensure they do all they can to safeguard every child's wellbeing, helping parents/guardians understand why they should refrain from including other individual children in such shots.

The official photographer

In some cases, the Organisation will ask a Member or officer to act as an official photographer for an event and in some cases they may employ a specialist photographer. Their role is to take appropriate photos that celebrate and promote one of our sports.

When taking any image, they must be asked to:

- Focus on the activity rather than the individual child. Include groups of children rather than individuals, if possible. Ensure all those featured are appropriately dressed.
- Represent the broad range of children participating in one of our sports.

- Organisations must screen applicants for their suitability (just as they would check any other Member of staff or volunteer working with children) and then provide training and information on the Organisation's child safeguarding policies and procedures.

The official photographer (whether a professional photographer or a member of staff) must receive clear instructions at an early stage, and the Organisation must establish and clarify the following points as part of the commissioning and contracting of an official photographer:

- Inform parents/guardians and children that a photographer will be in attendance.
- Ensure parents/guardians and children consent to both the taking and publication of films or photos.
- Check the photographer's identity, the validity of their role, and the purpose and use of the images to be taken.
- Issue the photographer with identification, which must be worn at all times.
- Provide the photographer with a clear brief about what is considered appropriate in terms of image content and their behaviour.
- Clarify areas where all photography is prohibited (toilets, changing areas, first aid areas, and so on)
- Inform the photographer about how to identify – and avoid taking images of – children without the required parental consent for photography.
- Don't allow unsupervised access to children or one-to-one photo sessions at events.
- Don't allow photo sessions away from the event – for instance, at a child's home.
- Clarify issues about ownership of and access to all images and for how long they'll be retained and/or used.

Responding to concerns

All staff, volunteers, children and parents/guardians must be informed that if they have any concerns regarding inappropriate or intrusive photography (in terms of the way, by whom, or where photography is being undertaken), these should be reported to the DSL. These concerns must be dealt with according to the safeguarding reporting process outlined.

Concerns about professional photographers should also be reported to their employers.

If there are concerns or suspicions about potentially criminal behaviour this must include referral to the Police.

General images of events

At many events, organisers wish to take wide-angle, more general images of the event, the site, opening and closing ceremonies, and so on. It's usually not reasonable, practical, or proportionate to secure consent for every participating child in order to take such images or to preclude such photography on the basis of the concerns of a small number of parents.

In these circumstances, organisers must make clear to all Members and parents that these kinds of images will be taken and for what purposes.

What to do when parental consent is not given:

Organisations have a responsibility to put in place arrangements to ensure that any official or professional photographers can identify (or be informed about) which children should not be subject to close-up photography. This should be done in consultation with parents.

You should consider:

- providing some type of recognisable badge, sticker or wristband; and/or
- a system for the photographer to check with the activity organiser and/or team manager to ensure it's clear which groups or individuals should not feature in images.

Secure storage of images

Images or video recordings of children must be kept securely:

Hard copies of images must be kept in a locked drawer.

Electronic images must be in a protected folder with restricted access.

Images should not be permanently stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones.

Avoid using any personal equipment to take photos and recordings of children – use only cameras or devices belonging to your Organisation.

If you're storing and using photographs to identify children and adults for official purposes –such as identity cards – ensure you comply with the legal requirements for handling personal information.

Guidance on filming children during training sessions

Filming during training sessions **is not appropriate unless** there is a legitimate need or purpose for the filming. For example, wishing to film children to assist in their stroke technique.

If there is a legitimate need or purpose, parents/guardians must be provided with full information such as when the filming is proposed, its purpose, who is filming, how the film will be used or published and an agreement on what will happen once the film has served its purpose. This allows parents/guardians to provide informed consent or otherwise. Written consent to the filming must be requested from the Member and their parents/guardians. Invite parents/guardians to be present at the filming; if this is impractical, allow them to view the film before publication.

Annex A: Safeguarding information for school and college staff

The following is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare of and safeguard children.

The role of school and college staff

1. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children has an important role to play.
2. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children.

What school and college staff need to know

3. For the purposes of safeguarding, a child is anyone under the age of 18. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
 - providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - taking action to enable all children to have the best outcomes

All staff should:

- Be aware of the systems in their school or college which support safeguarding, and these should be explained to them as part of staff induction. As a minimum this Annex and the child protection policy should be shared with staff at induction.

- Receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, e-bulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively.
- Know the identity of the designated safeguarding lead (and any deputies) and how to contact them.
- Know what to do if a child tells them they are being abused, neglected or exploited. This includes understanding they should never promise a child that they will not tell anyone else about a report of abuse, as this is unlikely to be in the best interests of the child.
- Should be able to reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.
- Should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

What school and college staff should look out for

Abuse, neglect and exploitation

4. Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation, so that they are able to identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
5. If staff are unsure, they should always speak to the designated safeguarding lead (or a deputy).

Forms of abuse and neglect

6. **Abuse:** 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. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

7. **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

8. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and 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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

9. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and **all** staff should be aware of it and their school or colleges policy and procedures for dealing with it.

10. **Neglect:** 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 involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

11. **All** staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

Safeguarding issues

12. **All** staff should have an awareness of safeguarding issues that can put children

at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos¹⁴⁸ (also known as youth produced sexual imagery) put children in danger.

Child-on-child abuse

13. **All** staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.

14. **All** staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment

What school and college staff should do if they have concerns about a child

15. Staff working with children should maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

16. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.

17. If staff have **any concerns** about a child's welfare, they should act on them immediately. They should follow their school or college's child protection policy and speak to the designated safeguarding lead (or a deputy). In the absence of the

¹⁴⁸ Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

designated safeguarding lead (or a deputy) staff should speak to a member of the school or college's senior leadership team.

18. The designated safeguarding lead (or a deputy) will generally lead on next steps, including who else, if anyone, in the school or college should be informed and whether to pass a concern to local authority children's social care and/or the police. In some instances, staff may be expected to support the local authority children social care assessment process. If this is the case, the designated safeguarding lead (or a deputy) will support them.

Why all of this is important

19. It is important for children to receive the right help at the right time to address safeguarding risks and prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective and immediate action. Examples of poor practice includes failing to act on and refer the early signs of abuse and neglect.

What school and college staff should do if they have a safeguarding concern or an allegation about another staff member who may pose a risk of harm to children

20. If staff have a safeguarding concern or an allegation is made about another member of staff (including supply staff, contractors, volunteers, and visitors) harming or posing a risk of harm to children, they should speak to the headteacher or principal (unless it relates to the headteacher or principal, in which case they should speak to the chair of governors, chair of the management committee, or the proprietor of an independent school).

What school or college staff should do if they have concerns about safeguarding practices within the school or college

21. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

22. Appropriate whistleblowing procedures should be in place for concerns to be raised with the school or college's senior leadership team.

23. Where staff feel unable to raise an issue with the employer or feel that their genuine safeguarding concerns are not being addressed [NSPCC whistleblowing advice line](#) is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Annex B: Code of Conduct for coaches and teachers

This code is something that you as a member of the coaching or teaching team should refer to in relation to your rights in your role, the respect you should expect but also that which you demonstrate to all members, what is expected of you in terms of listening and being listened to and your behaviour as a member of the club.

As a teacher or coach, you have the right to:

- Be supported in your role and respected and treated fairly by the club.
- Be informed of Wavepower and appropriate reporting procedures.
- Know who the DSL(s) is/are and how to contact them.
- Be informed of the club complaints process and who to contact at the club.
- Be aware of the club rules and procedures.
- Be involved and contribute towards decisions within the club.
- Have access to ongoing training and CPD in all aspects of your role.

As a coach or teacher of Active Swim, we expect certain standards of behaviour from our members. By becoming a member of the Organisation and therefore agreeing to this Code of Conduct you agree to:

Rules and regulations	Coaching and behaviour	You the person
Adhere to and implement this safeguarding policy, Wavepower and the current Appendix A of Keeping children safe in education.	Respect your position of trust to maintain appropriate boundaries and relationships with athletes, not using your position to obtain personal benefit or reward.	Champion everyone's right to take part and celebrate difference in our organisation or activity by not discriminating against anyone else on the grounds of gender, race, sexual orientation, faith, ability, or any other relevant characteristic.
Adhere to the Swim England Equality and Diversity Policy.	Not engage in any behaviour that constitutes any form of abuse.	Champion everyone's right to take part and celebrate the difference in our club or activity by not discriminating against anyone else on the grounds of gender, race, sexual orientation, faith, ability, or any other relevant characteristic.
Adhere to the Swim England regulations, Code of Ethics, and rules.	Refer all safeguarding and welfare concerns to the Designated Safeguarding Lead (DSL) or (DDSL).	Challenge and address instances of poor, negative, aggressive or bullying behaviour amongst children. Seek advice from the DSL where necessary.
Adhere to any conditions for teaching and coaching under the pool hire agreement	Respect children's trust and rights whilst being honest and open with them.	Keep your coaching and/or teaching qualifications and take part in the CPD opportunities within the organisation and beyond.
Keep children safe in your sessions with appropriate staffing ratios, using safe	Lead by example creating and promoting positive	To implement, adapt and amend the curriculum provide in meeting the

methods of instruction and techniques and by putting their safety first.	behaviour and a safe culture.	needs of the learner, teaching within the refinement of the curriculum.
Ensure any equipment used is fit for purpose, safe to use and accessible.	Encourage children to behave in a positive manner and follow the rules of the club and sport.	To maintain safety, and teach within the remit of your training from courses and relevant CPD.
Follow the appropriate procedures (i.e. pool NOP and EAP) should a child have an accident or suffer an injury.	Ensure that the assessment of swimmers is clear and transparent and is fair and equal when making decisions.	To plan, deliver and review high-quality learning in lessons.
	Use positive and constructive methods when teaching and coaching, and ensure programmes are appropriate for the age, ability and experience of the child.	Complete Swim England safeguarding training every three years.
	Always put the wellbeing, health and safety of the child before all other considerations including the development of performance.	Ensure you have a current Disclosure and Barring Service (DBS) certificate (renewable every three years).

Breaches of the Code of Conduct will result in disciplinary action being taken against you if any criminal offence is reported to the Police and any other relevant authority by the organisation.

To be signed by and dated electronically by the teacher and/or coach.

