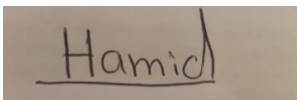




Safeguarding Children and Vulnerable Adults Policy

Approved by:	H Anwary
Signed:	
Date approved:	Mar 2026
Date review:	Mar 2027
Version No:	V3.2

V3	May 2024	Policy written
V3.1	Apr 2025	Tweaks to the policy, including DDSL and STA details.
V3.2	Mar 2026	Tweaks to the policy, including KCSiE changes.

Safeguarding Children and Vulnerable Adults Policy

Introduction

Active Swim is committed to ensuring a safe and secure environment for all individuals. Appropriate arrangements will be in place to deal with and respond to issues or concerns with suspected or reported abuse of children or vulnerable adults. Each individual has a fundamental right to be protected from harm and to maximise their potential for learning in a safe and secure environment. This policy applies to learners in courses and/or training.

Everyone working with children and vulnerable adults has a responsibility for keeping them safe. If you have concerns about the safety or welfare of a child or vulnerable adult, it is your responsibility to take action.

What is safeguarding?

The definition of safeguarding is the protection of individuals from neglect or physical, emotional or sexual abuse.

What are the types of abuse?

Physical abuse	Physical abuse is deliberate physical harm to an individual or the willful and neglectful failure to prevent physical harm or suffering. Types of abuse may include hitting, throwing, shaking, burning or scalding, poisoning, drowning, suffocating or causing physical harm. This also includes physical harm caused by a Parent or Carer wishing to fabricate or induce the symptoms of an illness.
Emotional abuse	Emotional abuse is the persistent emotional maltreatment of an individual, leading to severe and adverse effects on the individual's emotional development. Such examples of emotional abuse include conveying information that the individual is worthless or unloved, inadequate or unvalued. Symptoms of this can include limitations in learning and exploration, or the prevention of the individual's participation in normal social interaction. Emotional abuse could also lead to extreme bullying, leading the individual to frequently feel frightened or in danger, or the exploitation and corruption of the individual. Domestic violence, adult mental health problems or parental substance misuse may expose the individual to emotional abuse.
Sexual abuse	Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware of what is happening. These activities may involve physical contact (including penetrative or non-penetrative acts) or non-contact activities (including looking at or involving the individual in the production of pornographic material, watching sexual activities, or encouraging the individual to behave in sexually inappropriate ways).
Neglect	Neglect is the persistent failure to meet an individual's basic physical, emotional and/or psychological needs, likely to result in significant harm. Types of neglect may include failure to provide adequate food, clothing, and shelter (i.e. exclusion from the home or abandonment), failure to protect the individual from physical harm or danger, failure to provide access to medical care or treatment and failure to provide adequate supervision (i.e. childminder).
Harassment	Harassment is an unwanted act by the recipient. It may involve the provision of items or the commission of unwanted actions by another person. Still, by definition, the unwanted nature of the action or item distinguishes the act as harassment.

Specific Concerns

There are specific safeguarding concerns that have been identified in Keeping Children Safe in Education (September 2025) that need to be noted:

Bullying including cyberbullying	Gangs and youth violence
Children missing education	Gender-based violence/violence against women and girls (VAWG)
Child missing from home or care	Hate
Child-on-child abuse	Private fostering
Child sexual exploitation (CSE)	Preventing radicalisation
Domestic violence	Relationship abuse
Drugs	Serious Violence
Fabricated or induced illness	Sexting
Faith abuse	Trafficking
Female genital mutilation (FGM)	Upskirting
Forced marriage	

The indicators of abuse may include:

Physical indicators	Emotional indicators
Unexplained bruising	Unexplained changes in behaviour
Repeated injuries	Difficulty in making friends
Black eyes	Distrustful of adults
Injuries to the mouth	Excessive attachment to adults
Torn or bloodstained clothing.	Sudden drop in performance
Burns or scalds	Changes to the attendance pattern
Bites	Inappropriate behaviour or language
Fractures	Inappropriate sexual awareness
Inconsistent stories or excuses	Reluctance to remove clothing

How will we promote effective safeguarding?

- Have a designated Safeguarding Office to investigate any suspected abuse or allegations of abuse and report accordingly
- Adopt and implement the current edition of the Swim England Wave power policy (from May 2025). For example, no phones will be used in the changing rooms.
[Wavepower | Safeguarding for Swim England clubs \(swimming.org\)](https://www.swimming.org/Wavepower/Safeguarding-for-Swim-England-clubs)
- However, as part of KCSiE (September 2025), Active Swim operates from a school venue. Any allegation or low-level concerns will be reported to the school and followed in accordance with their procedures, in addition to this policy and in line with the current Swim England Wave Power policy.
- Provide guidelines and instructions to learners so that they are aware of what they need to do to maintain a safe environment
- Make sure that confidentiality is maintained appropriately
- Documentation related to safeguarding matters is maintained in a safe and secure manner
- As soon as possible, Active Swim has added ½ days (3 hours) to all SEQ Level 2 courses as a requirement for all learners, including the Swim England safeguarding in Aquatics CPD workshop as part of the course. For STA, learners are recommended to hold a valid Safeguarding certificate.
- Tutors must complete an enhanced DBS check every three years and/or sign up for the updating service by attending the Swim England Safeguarding CPD. For STA Tutors, the requirements for updates will need to be added.
- Tutors will read, understand and abide by the latest Swim England Code of Ethics, Wave Power and/or STA safeguarding policies and Keeping Children Safe in Education.

How to respond to a disclosure of abuse?

Always

- Listen carefully and stay calm
- Allow the child to talk and time to say what they need to say
- Reassure the child that they were right to say something
- Explain that you must pass the information on to the designated responsible officer, but that confidentiality will be maintained
- Explain to the individual what will happen next
- Reassure the individual that it will be dealt with appropriately
- Make a detailed note of the date, time, place, and comments made by the individual

Never

- Question or interview the individual unless seeking clarification
- Make promises you cannot keep
- Rush into actions which may be inappropriate
- Take sole responsibility; always pass information to the designated officer

Grooming other adults

Successful abusers groom not only the child but also the adults around the child. By grooming the adults around the child, developing a reputation of respectability, helpfulness or popularity within the centre or club, the abuser makes it more difficult for the child to disclose abuse, or for adults (who trust and may know the individual well) to accept even the possibility the allegations could be true.

If in doubt, report

You can contact the NSPCC helpline on 0808 800 5000 to discuss your concerns with a helpline counsellor. You do not need to say who you are, but you can talk about your worries, and a helpline counsellor can advise on what they think should happen next. You can also contact your local authority designated officer (LADO) and speak to the Swim England Safeguarding team. You can also complete a Whistleblowing form on our website without providing your contact details.

If we decide a child may be at risk or in need of additional support, the helpline counsellor will ask you for the child's details. You can decide whether you are willing to provide this information so they can act on your behalf by sharing it with the appropriate agency, such as children's services (also known as social services or children's social care).

How to make referrals?

Suspected abuse or sustained allegations must be reported immediately to the responsible **Safeguarding Officer**, who will, in turn, refer the case to the Local Safeguarding Children Board. The responsible Safeguarding Officer must record all referrals in writing within three working days of the referral. If the responsible Safeguarding Officer is unsure as to whether a case should be formally referred or has a general concern about a child's health or development, advice should be sought from the NSPCC.

In cases that allege harm to a child, potential criminal acts, child abuse, or allegations against an individual in a position of trust, the organisation must refer directly to statutory agencies such as the Police, MASH, Children's Social Care, and the Local Authority Designated Officer (LADO).

In cases where there is an allegation or concern that any person who works or volunteers with children has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;

- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

The organisation must refer to the Local Authority Designated Officer (LADO). Discussion with the LADO must take place within one working day of the allegation/concern being raised. The LADO or DO will advise on the next steps following referral, in accordance with Working Together to Safeguard Children (2018). The number for Hertfordshire LA is **0300 123 4042**.

The number of Richmond Upon Thames LA is **07774 332675**.

If you have concerns regarding Swim Active's Designated Safeguarding Lead or referrals, please get in touch with the relevant team using the details provided.

How to manage safeguarding during courses?

Measures to protect against allegations of abuse

1. Work in an open environment where others can see you
2. Avoid unaccompanied time with learners
3. Avoid unnecessary physical contact with learners unless this is to prevent danger or accident to themselves or others
4. Avoid using suggestive remarks or comments or acting inappropriately with learners
5. Do not provide learners with personal contact details (e.g. home address or home phone number) or socialise with learners outside of the course
6. Report any potential concerns, allegations or abuse made by learners to the Safeguarding Officer.

Emergency Contact Information

1. Each learner is required to complete an Emergency Contact Form before the commencement of the course. This will be sent out with the course booking confirmation.
2. For learners under 18, this should be signed prior to submission by their parent or guardian.
3. The Emergency Contact information will be held by the tutor for the duration of the course for emergency use only. At the end of the course, this information will be destroyed.

Registration

1. Learners must register in at the beginning of each day and register out at the end of each day.
2. Where a learner is more than 30 minutes late or does not attend on any given day of the course, the tutor should contact the learner using the contact details that have been provided.
3. Where the tutor is unable to contact the learner, they should advise the centre Key Contact. The Key Contact will continue to attempt to contact the learner.
4. Learners wishing to leave the training centre during their break must sign out and back in again once they return. Tutors will check that all learners have returned after a break.
5. Should any learner who has signed out not return within more than 30 minutes after the designated time, the tutor should contact the learner using the contact details that have been provided. Where the tutor is unable to contact the learner, they should advise the centre's Key Contact. The Key Contact will continue to attempt to contact the learner.
6. The signing-in/out sheet should be annotated with any non-attendance.
7. The signing-in/out sheet(s) should be returned to the key contact at the end of the course.

Reporting Concerns

1. If learners have concerns about their health or safety or that of anyone in the course, this should initially be raised with the course tutor or trainer.
2. Where a learner is/are unable to do this, then the learner can raise any issues with the responsible Safeguarding Officer, whose details are below
3. Alternatively, you can contact any of the following organisations:
<https://docs.google.com/viewerng/viewer?url=https://www.swimming.org/library/documents/4692/download>

- a. Swimline on 0808 100 4001
- b. NSPCC Helpline on 0808 800 500
- c. Childline 0800 1111

Whistleblowing Process

Anyone associated with SEQ, STA or RLSS can report any potential wrongdoing at any time. This includes internal staff, external consultants, and stakeholders.

- Learners who wish to raise concerns should first contact their tutor, assessor or Key Centre Contact unless the concern relates to those individuals; the learner should complete the online Swim England Qualification Whistleblowing form, found here: <https://swimenglandqualifications.com/whistleblowing/>
- Raising an Approved Training Centre concern with SEQ: If the concerns are not addressed by the Approved Training Centre or the individual feels that it is not possible to raise the concerns directly with the Approved Training Centre, then the individual should raise their concerns with SEQ.
- To report a potential wrongdoing, please complete the online form on <https://swimenglandqualifications.com/whistleblowing/>
The disclosure should provide as much information as possible, including:

Designated Safeguarding Lead (DSL)

Hamid Anwar
10 Burgundy Court
31 Arla Place
Ruislip
Middlesex
HA4 0GD
hamid@activeswim.co.uk

Deputy Designated Safeguarding Lead (DDSL)

Sue Moussa
susactiveswim@gmail.com

This policy will be reviewed on Sep 26, in line with Swim England's new WavePower and changes to the DfE Keeping Children Safe in Education.

Swim England Qualifications: [Wavepower | Safeguarding for Swim England clubs \(swimming.org\)](https://swimming.org)
Safety Training Awards: [Safeguarding Children, Young People and Vulnerable Adults Policy – STA.co.uk](https://STA.co.uk)