



Document: Safeguarding Children, Young People and Vulnerable Adults Policy

Last updated: Thursday, 22 October 2020

Safeguarding Children, Young People and Vulnerable Adults Policy

1. Premise

It is widely accepted that it is the responsibility of every adult to safeguard the wellbeing of children and vulnerable adults. Abuse can arouse strong emotions in those facing such a situation and it is important to understand these feelings and not allow them to interfere with your judgement about any action to take.

Abuse and poor practice can occur within many situations including the home, school and the sporting environment. Some individuals will actively seek employment or voluntary work with children or vulnerable adults in order to harm them. Everyone working in swimming either in a paid or voluntary capacity, together with those working in affiliated organisations has a role to play in safeguarding the welfare of children and vulnerable adults and promoting good practice.

A swimming teacher, lifeguard, lifesaver, or volunteer may have regular contact with children and be a very important link in identifying cases where an individual may be at risk or in need. When establishing guidelines it is important to recognise that the organisation has both a moral and legal duty of care to ensure that when it is given responsibility for children it provides them with the highest possible standard of care.

STA recognises that they have a responsibility to:

- Safeguard and promote the interests and well-being of children and vulnerable adults with whom it is working
- Take all reasonable practical steps to protect them from harm, discrimination, or degrading treatment
- Respect their rights, wishes and feelings.

Child and vulnerable adults protection procedures can:



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- Offer safeguards to the individuals with whom we work, and to our members of staff, volunteers and those in affiliated organisations
- Help to maintain the professionalism and the standards of practice that are associated with the members of STA.

We recognise that any procedure is only as effective as the ability and skill of those who operate it. We are committed to:

- Proper recruitment policies
- The provision of support and appropriate training
- Clear processes for recognition and responding to concerns
- Working together with parents/carers and other organisations to ensure that the needs and the welfare of all remains paramount.

2. Principles

- The child's welfare is paramount, as is that of the vulnerable adult
- All participant whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse
- All suspicions and allegations of abuse will be taken seriously; and responded to swiftly and appropriately
- Anyone aged 17 years or under (Scotland under 16 years) should be considered as a child for the purposes of this document.

Working in partnership with children and their parents/carers is essential for the protection of the children.

3. Recognition of abuse

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. STA acknowledges that their staff, whether in a paid or voluntary capacity, are not experts at such recognition. It therefore expects them to report any concern they may have about the welfare of a child immediately with the person in charge, as follows:



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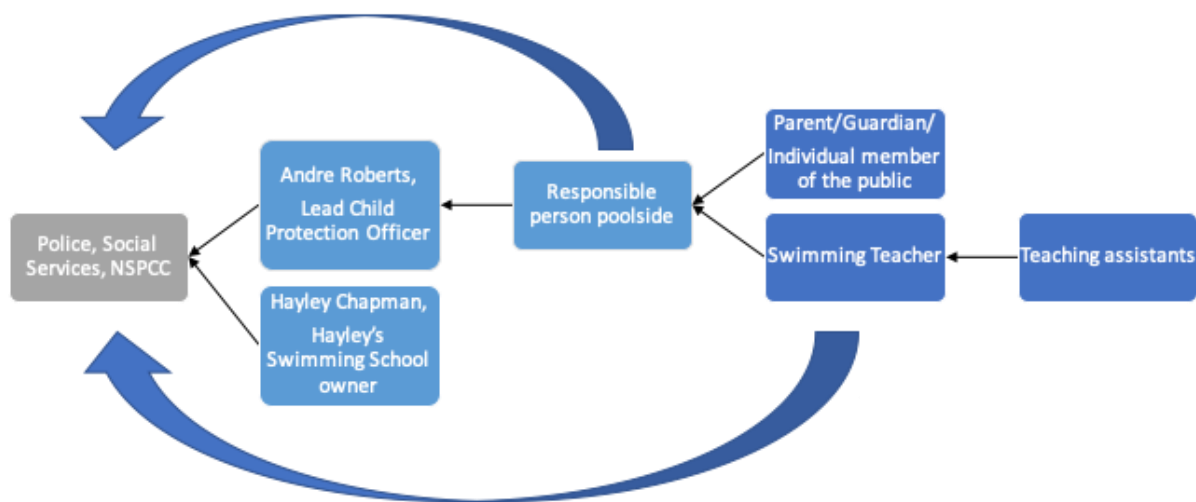


Figure 1: Organisation structure for reporting a safeguarding concern.

It is the responsibility of these people to ensure that appropriate advice is obtained from the local social services department or the NSPCC. If the person in charge is not available, or the concern is about the person in charge, the person in receipt of the information will contact the social services directly.



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4. Indications That a Child or Vulnerable Adult is Being Abused

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- An injury for which the explanation seems inconsistent
- The child describes what appears to be an abusive act involving him/her
- Someone else—a child or adult, expresses concern about the welfare of another child
- Unexplained changes in behaviour—e.g. becoming very quiet, withdrawn, or displaying sudden outbursts of temper
- Inappropriate sexual awareness
- Engages in sexually explicit behaviour in games
- Is distrustful of adults, particularly those with whom a close relationship will normally be expected
- Has difficulty in making friends
- Is prevented from socialising with other children
- Displays variations in eating patterns including overeating or loss of appetite
- Loses weight for no apparent reason
- Becomes increasingly dirty or unkempt.

It must be recognised that the above list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is actually taking place. It is not the responsibility of those working in swimming to decide that child abuse is occurring, but it is their responsibility to act on any concerns.

5. Forms of abuse

In December 2017, the NSPCC updated its definitions and signs of abuse, and the full information can be found at www.nspcc.org.uk. Below is a summary of the most recent publication.



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5.1 Physical abuse

Where adults, or young people, physically hurt or injure children by hitting, shaking, squeezing, burning and biting or by giving children alcohol, inappropriate drugs or poison. Attempted suffocation or drowning also comes within this category.

In sports situations, physical abuse might occur when the nature and intensity of training disregard the capacity of the child's immature and growing body. Physical abuse is also when an adult makes up or causes the symptoms of illness.

5.2 Sexual abuse

Girls and boys are abused by adults, both male and female, and by other young people who use children to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse, or fondling. Showing children pornographic material is also a form of sexual abuse as may be the taking of inappropriate photographs of children.

Swimming or related activities, which might involve physical contact with children, could potentially create situations where sexual abuse may go unnoticed. Also the power of the coach/teacher over young athletes/learners, if misused, may lead to abusive situations developing.

The proliferation of the internet means that online sexual abuse may also occur.

As well as the above forms of sexual abuse, there is a need to be aware of child sexual exploitation (CSE), when a child may be given gifts or affection in return for sexual activities. There is also a need to be aware of female genital mutilation (FGM), where a young girl has partial or total removal of genitalia for non-medical reasons. Signs of FGM may include a long holiday abroad, a special ceremony, difficulty in walking, sitting or standing as well as other signs of abuse.



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5.3 Emotional abuse

Persistent lack of love and affection, where a child may be constantly shouted at, threatened or taunted which may make the child very nervous and withdrawn. Emotional abuse also occurs when there is constant overprotection, which prevents children from socialising.

Emotional abuse in sport might include situations where children are subjected to unrealistic pressure by the parent or coach, or bullied in order to consistently perform to high expectations.



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5.4 Neglect

Where adults fail to meet a child's basic needs like food or warm clothing. Children might also be constantly left alone or unsupervised. Adults may also fail to, or refuse to, give children love and affection; this could be seen to be emotional neglect.

Neglect in a sport situation could include a teacher or coach not ensuring children are safe, or exposing them to undue cold.

5.5 Bullying and Cyberbullying

Although not a specific form of abuse, this can take the form of any of the acknowledged abuse forms. Bullying can occur face-to-face or in a more subtle manner such as through electronic methods like text messaging and social media. Bullying can not only be physical, sexual or neglectful in nature but also emotionally damaging.

At Hayley's Swimming School, we encourage adults to be the only person who uses social media to contact us and for the child to interact via a parent or guardian on our social media pages.

6. The Effects of Abuse

Abuse in all its forms can affect a child or vulnerable adult at any age. The effects can be so damaging, that if not treated, they may follow an individual into adulthood. For example, an adult who has been abused as a child may find it difficult, or impossible, to maintain a stable, trusting relationship; may become involved with drugs or prostitution; may attempt suicide, or may abuse a child in the future and find successful parenting difficult.

There have been a number of studies which suggest children with disabilities are at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation, and a powerlessness to protect themselves, or to adequately communicate that abuse has occurred. Children from ethnic minorities, who may also be experiencing racial discrimination, may be doubly powerless.



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7. Listening to the Child or Vulnerable Adult

If a child says or indicates that he or she is being abused, or information is obtained which gives concern that a child is being abused, the person receiving this information should:

- React calmly so as not to frighten the child
- Tell the child they are not to blame and that it was right to tell someone
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is said by a child who is very young, has a speech disability and/or differences in language
- Keep questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said
- Reassure the child, but do not make promises of confidentiality which might not be feasible in the light of subsequent developments
- Make a full record of what had been said, heard and/or seen as soon as possible.

8. Responding to Suspicions or Allegations of Child Abuse

It is not the responsibility of a staff member of Hayley's Swimming School to take responsibility or to decide whether or not child abuse is taking place. There is however, a responsibility to report concerns so that appropriate agencies can then make inquiries and take any necessary action to protect the child.

Whilst Hayley's swimming school acknowledges the importance of the role of statutory agencies involved in children's welfare (social services, police, NSPCC), it appreciates that there may be some reluctance to report direct to these agencies, especially if the person reporting is unclear as to whether abuse has occurred. As a result of this, and in line with Hayley's Swimming School's Duty of Care, Hayley's Swimming School have a Child Protection Officer (CPO), who should be contacted at the earliest possible time after the event or allegation. The CPO can then liaise directly with statutory agencies and assist the organisation that made the report.

The social services department has a statutory duty under the Children Act 1989 to ensure the welfare of a child. When a child protection referral is made its staff have a legal responsibility to investigate. This may involve talking to the



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child and family and gathering information from other people who know the child. Inquiries may be carried out jointly with the police.

8.1 What to do if there are concerns

1. There is always a commitment to work in partnership with parents or carers where there are concerns about their children. Therefore, in most situations, it would be important to talk to parents or carers to help clarify any initial concerns. For example, if a child seems withdrawn, they may have experienced bereavement in the family.
2. However, there are circumstances in which a child might be placed at even greater risk where such concerns to be shared, e.g. where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately.
3. In these situations, or where concerns still exist, any suspicion, allegation, or incident of abuse must be reported to the person in charge as soon as possible, and recorded.
4. It is the responsibility of the person in charge to inform the social services department without delay. If a person in charge is not available, the person discovering or being informed of the abuse should immediately contact the social services department or the police. If you're not sure about what to do, you can contact Hayley's Swimming School Child Protection Officer and/or the NSPCC's child protection helpline.

8.2 Recording and Information

Information passed to the social services department or the police must be as helpful as possible, hence the necessity for making a detailed record. The information should contain the following:

- The nature of the allegation
- A description of any visible bruising or other injuries
- The child's account, if he or she can give them, of what has happened and how any bruising or other injuries occurred
- Any times, dates, or other relevant information
- A clear distinction between what is fact, opinion, or hearsay
- Reporting the matter to the police or social services department should not however be delayed by attempts to obtain more information. Once an allegation or concern has been raised with the police, social services or the NSPCC then the concern must be passed on to Hayley's



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Swimming School via the CPO. Wherever possible, referrals telephoned to the social services department should be confirmed in writing within 24 hours. A record should also be made of the name and designation of the social services member of staff or police officer to whom the concerns were passed, together with the time and date of the call, in case any follow-up is needed.

Hayley's Swimming school has an incident report form which can be downloaded here. This form will help you ask the correct questions and record appropriate information, before sending it to the CPO.

Incident report form: <https://hayleysswimmingschool.co.uk/safeguarding-incident-report-form/>

9. Allegations of Abuse Against Members of Staff



This would include anyone working with children in a paid or voluntary capacity. For example, volunteers in clubs, club helpers, tutors on training camps, lifeguards and swimming teachers.

Abuse can and does occur outside the family setting. Although it is a sensitive and difficult issue, abuse has occurred within institutions and may occur within other settings, for example, in sport or other social activities. Recent inquiries indicate that abuse, which takes place within a public setting, is rarely a one-off event. It is crucial that those involved in swimming are aware of this possibility and that all allegations are taken seriously and appropriate action taken.

The person in charge may be informed of situations where they are unsure about whether the allegation constitutes abuse or not, and are therefore unclear about what action to take. There may be circumstances where allegations are about poor practice rather than abuse. In this instance, those responsible should always consult Hayley's Swimming School's CPO and avoid discussions with colleagues as there is a need to protect human rights of all concerned, including the individual against who the allegation is made.



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Do not hesitate to gain advice from social services, or the NSPCC where there is any doubt. This is because this may be just one of a series of other instances which together cause concern. It is acknowledged that feelings generated by the discovery that a member of staff or volunteer is, or may be abusing a child, will raise concerns among other staff or volunteers, including the difficulties inherent in reporting such matters. However, it is important that any concerns for the welfare of the child arising from abuse or harassment by a member of staff or volunteer should be reported immediately.

Where there is a complaint of abuse against a member of staff, there may be three types of investigation:

- A criminal investigation
- A child protection investigation
- A disciplinary or misconduct investigation.

The results of the police and social services investigation may well influence the disciplinary investigation, but not necessarily.

As a member of the STA, Hayley's Swimming School will conduct any investigation in consultation with the Lead Child Protection Officer of the STA.

- If, following consideration the allegation is clearly about poor practice, then Hayley's Swimming School STA will deal with this as a misconduct issue
- Any suspicion that a child has been abused by a member will be reported to a person in charge who will take such steps as he or she considers necessary to ensure the safety of the child in question and any other child who may be at risk
- The designated person will refer the allegation to the social services department who may involve the police
- The parents or carers of the child will be contacted as soon as possible following advice from the social services department
- The person in charge should also notify both STA's Chief Executive Officer and LCPO
- Every effort should be made to ensure that confidentiality is maintained for all concerned
- If the person in charge is the subject of the suspicion/allegation and is a member of STA, the report must be made to STA's LCPO who is then responsible for taking the action outlined above



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- Irrespective of the findings of the social services or police inquiries, STA must assess all individual cases under the appropriate misconduct/disciplinary and welfare procedures, to decide whether a member should be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, the STA will reach a decision based upon the information that is available which could suggest that on a balance of probability it is more likely than not that the allegation is true. The welfare of children should always remain paramount.
- Consideration should be given to what support may be appropriate to children, parents and members of staff.

10. Non-Recent Historic Abuse

Non-recent historic abuse refers to one of 3 situations:

1. An adult making an allegation of abuse when they were under 18 years of age, that occurred at least 1 year before it was reported
2. A child making an allegation of abuse that occurred at least 1 year before it was reported
3. Someone reports an allegation, on behalf of someone else, relating to an offence committed over a year ago.

Source: NSPCC (2018)

Such disclosures can occur after long periods of time as the complainant may now feel comfortable that they are no longer at risk, have the confidence to make an allegation that will be believed, become aware that there have been other reports, or feel they need closure to move on. Whatever the motive, and however long ago the allegation, action must be taken because:

1. The alleged may not have been an isolated incident
2. It may be part of a wider abuse situation
3. The person(s) may still be abusing individuals and/or working with children
4. There may be ongoing legal action

Source: NSPCC (2018)



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Should an allegation or disclosure be made to a member of staff it is important to record and report such information as you would if it were a current situation. Hayley's Swimming School and our governing body, the STA, maintain extensive records and will support any statutory agency investigating non-recent historic allegations, but please be reassured that all information is stored in line with current data protection and general data protection regulations.

Even though the abuse may have occurred many years ago, the impact may be significant and long lasting. Please reassure the individual that it is not their fault, and that the allegation is taken seriously.

If the individual concerned is confident enough, ask them to call the police non-urgent crimes number on 101 to report the abuse.

If the individual concerned is not confident to call the police, then report the allegation as if it was a current incident, using the available forms. However, please make a note that this is an historic abuse allegation/disclosure.

Support for the victims of abuse can seek support from the National Association for People Abused in Childhood (NAPAC).

11. Prevention

All people have a right to be safe and to be treated with dignity and respect.

Basic guidelines will help safeguard both children, staff, volunteers and the organisation concerned and reduce the risk of allegations being made. These are listed below.



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11.1 Recruitment and Selecting Staff and Volunteers

Anyone may have the potential to abuse children in some way and it is important that all reasonable steps are taken to ensure that unsuitable people are prevented from working with children. It is essential the same procedure is used consistently whether staff be paid or unpaid in part-time or full-time occupation.

When undertaking pre-selection checks the following should be included:

- All volunteers and staff working for a club should complete an application form
- Application forms should be designed to elicit information about an applicant's past career (including any gaps), and to establish any criminal record
- Consent should be obtained from applicants for police and social services checks
- At least two references should be taken up, including at least one regarding previous work with children, and one from a professional that is unrelated to the applicant
- Clubs and employers should have effective measures in place to ensure the confidentiality of information received in relation to applicants is treated with the strictest of confidence
- All volunteers and employees should sign a child protection protocol
- All volunteers and employees should be checked with the following organisations who maintain information about individuals who are deemed unsuitable to work with children:

In England and Wales

[Disclosure and Barring Service](#)

In Scotland

[Disclosure Scotland](#)

In Northern Ireland

[Data Protection Unit](#)

The STA act act for Hayley's Swimming School as an umbrella body for the purpose of [obtaining DBS disclosure on yourself, employees and volunteers](#).



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11.2 Policy and Procedure

To help prevent abuse of children the club or organisation should have a policy which ensures that children are protected and kept safe from harm. Everyone involved in the care of children should know what to do if there are concerns about abuse and where procedures are kept.

11.3 Training and Seminars

It should be recognised that checks are only part of the process to protect children from possible abuse by members of staff. STA teachers are required to have completed safeguarding children, young people and vulnerable adults training, with the STA's course or an acceptable alternative as determined by STA. They should receive appropriate ongoing training and attend suitable seminars undertaken by experienced deliverers so that they are aware and sensitive to potentially abusive situations.

Hayley's Swimming School will endeavour to make sure swimming teachers update their safeguarding training every 3 years, in line with other providers.

11.4 Supervision

Managers should be sensitive to any concerns about abuse or not adhering to good practice as set out below, and act on them at an early stage. They should also offer appropriate support to those who report concerns.

11.5 Complaints and Appeals

The management of Hayley's Swimming School will ensure that there is a well-established complaints procedure in operation and that parents and their children have the relevant information that will allow easy access to this procedure.



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11.6 Good Practice in the Care of Children

You can reduce situations for the abuse of children and help to protect staff and volunteers by promoting good practice. The following are more specific examples of care which should be taken when working within a swimming context.

- Always be publicly open when working with children. Avoid situations where a teacher/coach and individual swimmers are completely unobserved.
- Where any form of manual support is required, this should be provided openly and with the assent of the child and consent of the parent. The teacher should also be extremely careful as it is difficult to maintain hand positions when the child is constantly moving. The views of parents/guardians should always be carefully considered.
- Where possible parents/guardians should take on the responsibility for their children in the changing rooms. Where classes have to be supervised in the changing rooms always ensure that teachers/coaches work in pairs. Encourage an open environment, e.g. no secrets.
- Do not take children alone in a car on journeys, however short.
- Where cases arise where it is unavoidable that these things do happen, they should only occur with the full knowledge and consent of someone in charge in the organisation, or the child's parents.

And you should never:

- Engage in rough, physical or sexually provocative games, including horseplay
- Share a room with a child
- Allow or engage in inappropriate touching of any form
- Allow children to use inappropriate language unchallenged
- Make sexually suggestive comments to a child even in fun
- Let allegations a child makes go unrecorded, or not acted upon
- Do things of a personal nature that children can do for themselves
- Have children stay at your home with you unsupervised
- Spend excessive amounts of time alone with children away from others
- Take children to your home where they will be alone with you
- Take still or movie photographs of children without obtaining the guardians consent in writing.



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It may be sometimes necessary for staff or volunteers to do things of a personal nature for children, particularly if they are young or are children with disabilities. These tasks should only be carried out with a full understanding and written consent of parents and of the children involved. There is a need to be responsive to a child's reactions and if a child is fully dependent upon you, talk with them about what you are doing and give them choices where possible. This is particularly so if you are involved in any dressing, or undressing of outer clothing, or where there is physical contact of lifting or assisting a child to carry out particular activities.

If during your care of a child you accidentally hurt them, the child seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands or misinterprets something you have done, report any such incident as soon as possible to another colleague and make a brief written note of it. Parents or carers should be informed of the incident.