

Swim England Qualifications Safeguarding & Welfare Policy

Please note: This policy is to be used exclusively for the purposes of those organisations, individuals or stakeholders that participate within, or are associated with, the administration and delivery with educational qualifications or courses accredited and approved by Swim England Qualifications.

1. General

- 1.1. Swim England Qualifications (SEQ) are a distinct department within Swim England, the National Governing Body for aquatics in England. SEQ is fully committed to safeguarding and promoting the welfare of children, young people, and adults at risk across all areas of its operations. SEQ acknowledges that safeguarding is a collective responsibility and must be embedded into all practices to ensure the highest safety, protection, and well-being for those involved in its qualifications and accredited products.
- 1.2. This policy has been developed in alignment with Swim England's latest [Wavepower](#) policy guidelines, ensuring that the procedures reflect the most current and rigorous safeguarding requirements for the aquatics sector. Additionally, SEQ integrates the latest Safe Supervision¹ guidance, which provides updated standards for the safe operation of swimming pools in support of the Health and Safety Executive's² (HSG179) fourth edition guidance. Together, these frameworks form a comprehensive approach to safeguarding that balances legal compliance with sector-specific best practices in order to support the breadth of welfare that exists during the delivery and / or assessment within any of SEQs qualifications.
- 1.3. 'Safeguarding is everyone's responsibility' underscores the principle that protecting the welfare of at-risk children and adults is not the responsibility of a single individual or group but a shared duty that extends to all stakeholders within SEQ. This includes Approved Training Centres (ATC's), Educators (including Presenters), learners, parents or guardians, pool operators and other stakeholders, as well as key partners, such as the Royal Life Saving Society (RLSS). Everyone involved in the delivery of SEQ accredited courses must prioritise the best interests of at-risk children and adults in every decision, action, and interaction.
- 1.4. Safeguarding requires vigilance, open communication, and a proactive approach to identifying risks, preventing harm, and responding promptly to concerns. Educators, for instance, must maintain a safe and supportive environment by recognising the signs of abuse, exploitation, or neglect and knowing the correct channels for reporting concerns. Parents and guardians (where applicable) also play an integral role by working collaboratively with Educators and ATC's to ensure learners are protected, supported, and safe. SEQ emphasises that safeguarding is not an isolated process but a collective commitment to creating a culture where safety and well-being are central across all training and learning, which lies at the foundation in supporting Swim England's mission

¹ [Safe Supervision Aug 2024](#)

² [Health and Safety Executive](#)

'to lead and serve an aquatics community to enable safe, enjoyable and successful experiences.' You can read more on the 'One Swim England' strategy [here](#).

- 1.5. SEQ accepts that welfare may from time to time extend into the remit concerning safety, and as such ATCs must suitably provide guidance and training to their staff where necessary in order to effectively support all learners when providing delivery and / or assessments when registered on an SEQ qualification or other programme or course. Programmed sessions, such as structured swimming lessons and assessment activities as part of any SEQ qualifications involving registered learners, must have dedicated and competent supervision where necessary, such as provided by Educators, tutors or others in the position of supervision, ideally holding recognised rescue qualifications, for example the RLSS National Pool Lifeguard Qualification (NPLQ) or the National Rescue Award for Swimming Teachers and Coaches (NRASTC).
- 1.6. Alignment with the Wavepower³ policy ensures that SEQ adheres to the latest safeguarding practices. Wavepower sets mandatory policies and procedures that all affiliated organisations must follow to protect children and adults at risk. SEQ is committed to embedding Wavepower's standards into its safeguarding practices. The alignment also expands to adult safeguarding, including clearer guidance on [how to report concerns](#), which brings a significant enhancement in the latest update. Stakeholders reading this policy should also remain aware of Wavepower's requirements and where mandatory, implement its procedures and reporting processes to safeguard participants effectively.

2. Purpose and Scope

- 2.1. This policy applies to all stakeholders involved with SEQ, including, ATC's, Educators, learners on courses, parents/guardians, participants on relevant swimming or other aquatic programme accessed in support of the running of qualification(s) or course(s) across delivering or assessment practice(s) (where appropriate), pool operators and other relevant stakeholders.
- 2.2. SEQ recognises that ATC's and Educators play a pivotal role in safeguarding, as they are often the first point of contact for learners and provide the environment in which trust and protection are established. SEQ has provided this policy to provide further guidance in support of ATC's and their obligations.
- 2.3. As part of the delivery and assessment of SEQ's qualifications, Parties are expected to publish up to date and appropriate safeguarding policy guidance, upholding the guidelines set out within Wavepower, including its revisions and updating their policies accordingly, as well as executing their safeguarding responsibilities where appropriate.
- 2.4. This policy has considered and inserted where appropriate additional information in support of enhancing safeguarding and welfare, including aspects such as site-specific risk assessments, robust supervision practices, and adherence to relevant pool safety operating procedures (PSOPs), without undermining specific pool operator facilities practices, which may be present in support of Safeguarding and welfare arrangements, and appropriately covered within relevant Health & Safety policy guidance. This includes

³ Wavepower: Swim England's safeguarding policy

ensuring that all Educators are appropriately licensed, competent, and hold an up to date safeguarding training [certificate](#). Educators and Presenters should also maintain dynamic risk assessment practices across all sites to ensure the ongoing safety of all participants while in their care. Applying specific measures, for example, promoting consistent supervision during programmed and unprogrammed sessions, will ensure compliance with updated Safe Supervision and relevant Wavepower guidance, whilst mitigating risks by adopting such measures aligned with HSG179. The supervision of learners must be conducted with care and diligence, particularly in aquatic settings where environmental risks are heightened.

- 2.5. SEQ further extends its safeguarding obligations to learners, recognising that children, young people and adults (including those registered as vulnerable) must be supported, as well as support others, in a safe, structured environment that prioritises everybody's welfare. Parents and/or guardians are also integral to the culture of practices relating to safeguarding, and their understanding of this policy strengthens a shared approach to safety and well-being.
- 2.6. SEQ places significant emphasis on integrating adult safeguarding into its policy, acknowledging that adults at risk, such as those working within the aquatics industry or facing situational vulnerabilities, require specific measures to ensure their welfare is equally protected. This proactive inclusion ensures that adults in training, teaching, learning or any supervisory roles within the SEQ ecosystem are protected, supported, and treated with dignity and respect.

3. Definition of safeguarding

- 3.1. Safeguarding is the proactive process of protecting individuals from harm, abuse, neglect, or exploitation and promoting their overall welfare. It encompasses all measures to create safe environments where individuals, particularly children and adults at risk, are free from harm and supported in reaching their full potential.
- 3.2. Safeguarding within SEQ aligns with statutory guidelines, such as Keeping Children Safe in Education⁴ and Working Together to Safeguard Children⁵, as well as industry-specific policies as mentioned previously. The core principle of safeguarding is to ensure that all stakeholders prevent harm before it occurs, while promptly responding to concerns in order to mitigate risks. For SEQ, this involves implementing robust policies, clear reporting mechanisms, and fostering a culture of accountability, where safeguarding is viewed as everyone's responsibility. This includes ensuring all Educators and ATC's adhere to safeguarding requirements and participate in relevant training (e.g. Swim England [safeguarding training](#)), in order to maintain awareness of the signs of abuse, neglect, and exploitation etc.
- 3.3. A child is defined as any individual under 18, regardless of maturity, capability, or independence. This definition aligns with legal frameworks such as the Children Act 1989 and 2004 and safeguarding guidance, including Working Together to Safeguard Children and Wavepower 2024. Children, by their age, are inherently vulnerable and require specific protections to ensure their safety and well-being in all environments. In

⁴ [Keeping Children Safe in Education](#)

⁵ [Working Together to Safeguard Children](#)

the context of SEQ, children engaging in education, training, or aquatic activities must be safeguarded to protect them from harm, neglect, abuse, and exploitation. Educators, ATC's, and all individuals involved in delivering SEQ accredited courses (such as qualifications) must recognise their duty of care and ensure children are supported in an environment that is safe, respectful, and conducive to learning and development.

- 3.4. An 'adult at risk' refers to any adult (as defined in the Care Act 2014), who are typically aged 18 or older, who may be vulnerable due to situational factors, specific needs, or their role within the aquatics sector. While they may not fall under the traditional definition of "vulnerable adult" as outlined in safeguarding legislation, adults at risk include those working in aquatics or related roles who could experience challenges protecting themselves or advocating for their welfare. This could encompass adults with physical or mental health challenges, adults with disabilities, or those who, by their working environment may be, for example, exposed to risks such as discrimination, exploitation, or harm.

4. Legal Framework

- 4.1. This policy is underpinned by a robust legislation framework, statutory guidance, and industry-specific best practices to ensure the highest safeguarding, welfare, health and safety standards across SEQ. These key documents form the foundation for safeguarding children, young people, and adults at risk and providing clear operational standards to protect all individuals participating in SEQ activities.
- 4.2. The Children Act 1989 & 2004 is central to safeguarding practice, ensuring the child's welfare is paramount. The Act places a statutory duty on individuals and organisations to protect children from harm and promote their welfare. It establishes clear legal definitions of neglect, abuse, and harm, ensuring that all safeguarding activities align with the fundamental rights and protections afforded to children. The 2004 amendment reinforces the need for multi-agency collaboration, requiring all organisations to work together to identify and address safeguarding concerns effectively. SEQ's policy reflects these legal duties, ensuring that children's needs are prioritised in every decision and that appropriate action is taken when safeguarding concerns arise.
- 4.3. The Working Together to Safeguard Children (2023) statutory guidance further enhances this legal foundation by outlining how all individuals and organisations must collaborate to safeguard children. This guidance emphasises a child-centred approach, ensuring children are seen, heard, and protected. It reinforces that safeguarding is everyone's responsibility and highlights the importance of early intervention to address concerns before they escalate. SEQ aligns its safeguarding procedures with this framework, ensuring ATC's and Educators understand their roles in recognising signs of abuse, sharing information appropriately, and working with safeguarding partners such as local authorities, social services, and law enforcement agencies.
- 4.4. As mentioned throughout this document, Wavepower 2024 is Swim England's comprehensive safeguarding policy, providing mandatory procedures and best practices for safeguarding children and adults at risk within aquatics. This latest version of Wavepower, updated in January and September 2024 respectively, reflects evolving safeguarding requirements and introduces significant updates, such as adult safeguarding provisions, clearer supervision protocols, digital communication, and

changing facilities. SEQ fully aligns with Wavepower to ensure consistency in safeguarding standards across all its programmes. This includes mandatory training for Educators, safer recruitment practices, implementing reporting mechanisms for concerns, and promoting a culture where safeguarding is a priority for all stakeholders. Please also see section 1 (1.2) contained within this policy for details on how the safe supervision guidance was referenced in support of this policy.

- 4.5. These legislative, statutory, and sector-specific frameworks form a comprehensive foundation for SEQ's Safeguarding Policy. By adhering to these standards, SEQ ensures that its programmes meet national and industry expectations, prioritising the safety, welfare, and protection of all individuals involved.

5. SEQ Requirements

- 5.1. SEQ plays a critical role in establishing a culture where safeguarding is a fundamental priority, ensuring that all stakeholders operate in line with the highest safety and welfare standards.
- 5.2. SEQ promotes and expects strict adherence to Swim England's Wavepower 2024 guidelines and the latest Safe Supervision Guidance. SEQ ensures that these guidelines are consistently communicated, understood, and integrated into all SEQ operations and considered within each process or procedure, from policy creation to programme delivery.
- 5.3. SEQ engage with ATC's, Educators, learners and other partners to ensure compliance, offer guidance, and address emerging challenges in safeguarding practice. It also works closely with Swim England Educator Training in the subsequent guidance and information provided across its training and licensing functions.
- 5.4. A key responsibility of SEQ is to respond appropriately to safeguarding concerns promptly, transparently, and in line with legal, policy and ethical obligations. By establishing clear recording and reporting pathways as part of this policy and acting decisively on any issues raised, ensuring that all concerns are appropriately escalated to relevant safeguarding authorities, such as to Swim England Safeguarding Department, or if necessary, to local safeguarding partners or law enforcement agencies. SEQ maintains records of safeguarding cases in light of learnings, evidence requests, or in support of its design of qualifications and subsequent policies, in line with its privacy policy.
- 5.5. SEQ reinforces accountability by maintaining a transparent process where outcomes are communicated sensitively and appropriately to ensure trust and confidence among all stakeholders.

6. Approved Training Centre Requirements

- 6.1. ATC's, are organisations authorised and approved to deliver SEQ qualifications and accredited courses. ATC's play a pivotal role in the safeguarding ecosystem by providing safe, structured, and supportive environments for learners of all ages and abilities.

- 6.2. As frontline providers for training and administration (such as registration), ATC's are responsible for upholding SEQ's safeguarding policy guidance, as well as meeting all other legal and ethical standards, while ensuring that safeguarding measures are operationalised at every level of delivery. This includes conducting thorough risk assessments, maintaining a safe supervision framework, and ensuring their Educators are appropriately trained and licensed.
- 6.3. ATC's are also responsible for embedding safeguarding practices into their day-to-day operations, ensuring that they have in place suitable and up to date safeguarding policy guidance, and sufficient Health & Safety guidelines, plus reporting processes for others to follow.
- 6.4. ATC's are expected to notify all safeguarding concerns to SEQ, in the event that it has potential to, or is likely to affect any learner(s) attending the course of learning requiring us to act (in the event of potential or actual adverse effect), which we decide may necessitate a notification to the regulator(s) or other relevant bodies. Should any incident of this nature be reported to us, this will automatically be shared with the Swim England Safeguarding team to determine the most appropriate course of action.
- 6.5. ATC's are also expected to be fully abreast of existing policies and guidelines provided by those pool sites/venues at which they deliver training to learners of, ensuring that Educators and learners are aware of specified procedures and protocols, ensuring the welfare of those affiliated to its course(s). e.g. Pool Safety Operating Procedures (PSOPs)
- 6.6. ATC's must ensure that safe supervision practices are adopted by Educators, including conducting dynamic risk assessments for all training activities where it is necessary and applicable—due to the nature of the site/venue layout or course delivery type used and that those Educators working at those site(s) are familiar with and apply, when necessary, the specific PSOPs, which include both Normal Operating Procedures (NOPs) and Emergency Action Plans (EAPs).
- 6.7. ATC's are expected to monitor regularly through their own quality assurance approach, ensuring that those Educators that work for them continuously adhere to the guidance set out within their own policy, in conjunction with the principles of this policy, ensuring industry best practice is maintained and procedures are followed. This includes treating learners with dignity and respect, maintaining appropriate boundaries, serving as positive role models, and prioritising participant safety and well-being, as outlined within the Swim England Code of Ethics.
- 6.8. By creating a safe and inclusive environment, ATC's help learners develop their skills while ensuring their welfare remains the top priority. SEQ expects ATC's to adopt a proactive safeguarding approach, regularly reviewing their policies and procedures to reflect best practices and legislative updates, ensuring the safety of children, adults at risk, and all participants, as well as its workforce.
- 6.9. For any other delivery organisation not classified under status of an ATC, who may deliver courses accredited by SEQ, it is expected they will abide by the guidelines as set out in this policy.

7. Educator Requirements

- 7.1. All Educators must hold a current Swim England license. As part of the licensing scheme and relevant to safeguarding, the tutor/assessor will:
- Complete a Disclosure and Barring Service (DBS) check (previously referred to as a CRB) and update every three years or sign up to the DBS update service
 - Complete a Swim England approved safeguarding course and update every three years
 - Read, understand and abide by the Swim England Code of Ethics, Wavepower and Keeping Children Safe in Education Policy documentation.
 - Any other action or activity in support of their continuing licensing requirements where necessary.
- 7.2. It is suggested that Educators read and confirm they have understood the relevant ATC's safeguarding policy and reporting processes adopted prior to undertaking delivery of any SEQ accredited courses.
- 7.3. That all Educators are familiar with both the role and responsibilities of the ATC's for which they represent, and their responsibilities during the delivery and /or assessment per site, as stated in section 6.6.

8. Identifying Types of Abuse

- 8.1. Identifying abuse is essential for safeguarding, requiring vigilance from all stakeholders to recognise signs of harm, neglect, or exploitation. Abuse can severely impact a child or adult at risk's physical, emotional, and psychological well-being.

Types of Abuse and Indicators:

- 8.2. For further details on definitions of abuse, refer to page 15 within Wavepower, including examples of types of abuse such as.
- Physical Abuse
 - Emotional Abuse
 - Sexual Abuse
 - Neglect
 - Bullying and Cyberbullying
- 8.3. Please note, appendix A provides additional examples as stated by the Department for Education (DfE), where different terms may have been used to illustrate the same type of abuse.

9. Reporting Abuse

- 9.1. Reporting Concerns is critical to ensure that safeguarding measures are implemented effectively, and that appropriate action is taken to protect individuals at risk. In cases of immediate risk, where a child or adult at risk is in danger of significant harm or abuse, the priority is to contact emergency services or relevant safeguarding authorities without delay.

9.2. 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 learners 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 conditions being met, as detailed in this policy and/or Wavepower and in line with the ATC safeguarding policy for which that course(s) is registered with.

9.3. For further details please read section 2.3 on page 34 contained within the Wavepower policy. Those who enact reporting actions as stated in 9.2 must use the designated reporting channel at safeguarding@swimming.org following the guidance provided [here](#), and contact SEQ via info@swimenglandqualifications.com.

9.4. If any individual suspects that someone is abusing a child or adult, or using abusive/inappropriate behaviour or language, reporting the abuse may not be something they want to consider, particularly if the alleged abuser is a friend or colleague. Individuals initial reaction may be to dismiss it or try to prove it is not true. It is vital that the concerns, however how small, are reported. By not reporting those concerns it could mean that the abuse will continue.

9.5. There are many reasons why adults do not report their concerns, **but you should never let anything stop you from protecting an individual at risk.**

Barriers to responding and reporting

- Disbelief
- Conflict of interest
- Communication difficulties
- Grooming
- Fear of getting it wrong
- Lack of knowledge
- Position of power
- Reporting systems
- Not knowing who to contact
- Not wanting to get involved
- Fear of consequences
- Not seeing anybody else doing anything
- Feeling vulnerable

Grooming other adults

9.6. 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

- 9.7. You can contact the NSPCC helpline on 0808 800 5000 where you can discuss your concerns with a helpline counsellor. You can talk about your worries and a helpline counsellor can advise what they think should happen next. You can also contact your Local Authority Designated Officer (LADO), or speak to the Swim England Safeguarding team, Swim England Educator Training or a member of staff at SEQ.
- 9.8. You can also make submission anonymously in relation to suspected wrong doing by following guidance contained [here](#). For more guidance, please refer to SEQ's Whistleblowing Policy.

10. Safe Use of technology

- 10.1. The prohibition of mobile phone use in changing rooms, as per Wavewater guidance, is a fundamental safeguarding measure designed to protect the privacy, dignity, and safety of children, young people, and adults at risk. Changing rooms are recognised as vulnerable spaces where individuals are often undressed, making them susceptible to inappropriate behaviour, breaches of privacy, or exploitation through the misuse of mobile devices. Mobile phones, tablets, or similar digital devices equipped with cameras or recording functions pose significant risks, as they can be used to capture images or videos without consent. Even where intentions are innocent, mobile devices in changing rooms can create discomfort and heighten the risk of safeguarding breaches, including covert filming, inappropriate image sharing, or cyberbullying.
- 10.2. SEQ strictly prohibits using mobile phones and other devices in changing rooms during SEQ-related activities to mitigate these risks. This policy applies to all stakeholders, including learners, Educators, ATC's, parents/guardians, and visitors. ATC's are responsible for clearly communicating this policy through their own guidance and information in conjunction with the site(s), such as via signage, learner agreements, and induction processes to ensure that all participants know and comply with this safeguarding measure. For more guidance, please see page 82 within Wavewater [here](#).
- 10.3. Restricting direct communication with learners to parents or guardians is another critical safeguarding measure that reinforces appropriate boundaries and reduces the risk of abuse, grooming, or misunderstandings. Educators, Presenters and ATC's are discouraged from engaging in direct, unsupervised communication with learners under 18 through phone calls, text messages, emails, or social media platforms (e.g. WhatsApp and Facebook). This restriction ensures that all communications are transparent, professional, and accountable, thereby minimising the risk of inappropriate or misunderstood interactions between adults in positions of trust and learners. Educators and other supervisors are encouraged to use formal communication channels, such as emails or group messaging systems, where parents or guardians are included in all correspondence, in line with the ATC's policy guidance.
- 10.4. In the event when communication is necessary to share important course-related information, session updates, or emergencies, it must be directed as per the guidelines set out within the ATC's policy.

10.5. For operational purposes, where direct communication with learners under the age of 18 years old may occasionally be necessary, such as during training events, or off-site activities, Educators must obtain prior written consent from parents or guardians. In such cases, communication must remain strictly professional, transparent, and limited to the specific activity or concern. ATC's should also use approved group communication tools or systems where messages are visible to parents and participants, ensuring no private conversations occur between Educators and learners.

11. Monitoring and review

11.1. This policy will undergo a regular reviewing as stated under section 12.2 to ensure it remains robust, current, and aligned with the latest safeguarding practices as stated within Wavepower, safe supervision guidance drafted by industry, and other statutory or legislative requirements released in Education.

11.2. The review of this guidance will be in consultation with relevant safeguarding representatives.

12. Quality Assurance

12.1. This document supports the Conditions;

Related Ofqual General Conditions of Recognition:	A6; A7; C1; C2
Related Qualifications in Wales Standard Conditions of Recognition:	A6; A7; C1; C2

12.2. This policy is reviewed annually to ensure it continues to meet our needs and those of our regulators or earlier, if necessary, as a result of feedback, monitoring activities, requirements from our regulators or changes in legislation.

For Office Purposes

Document Version Number	Comments on Amendments and/or Additions	Published Date
7	New document, guidance on alignment with Wavepower and Safe Supervision guidance. Amended title, formatting and layout improvements.	April 2025

Appendix A – Statutory Guidance for Safeguarding (DfE)

Specific safeguarding concerns related to an education setting are detailed within the following documents:

- **Keeping Children Safe in Education**
- **Working Together to Safeguard Children**

It is essential that all those that work with children are fully aware of these documents within the landscape of education. They list the responsibilities of the various key stakeholders, detailing who and what to do in the case of a safeguarding concern. Rather than replicate this in this policy document SEQ require all key stakeholders to ensure they meet the requirements of these statutory documents fully.

The specific safeguarding concerns noted in Keeping Children Safe in Education include:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Bullying including cybercrime
- Children missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Child-on-child sexual violence and sexual harassment
- Serious violence
- Domestic abuse
- Drugs
- So-called ‘honour-based’ abuse (including Female genital mutilation (FGM) and Forced marriage)
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Modern Slavery (including trafficking)
- Upskirting
- Children who are lesbian, gay, bi, or trans (LGBT)
- Children with special educational needs and disabilities or health issues