

Annual Governance Statement: The Amateur Swimming Association (Swim England) Ltd

Reporting Period: 1 April 2025 - 31 March 2026

Introduction

The Amateur Swimming Association (Swim England) Limited (**Swim England**) is the national governing body for swimming, diving, water polo and artistic swimming (the **Sports**) in England. As a limited liability company, also registered as a charity, Swim England is committed to the principles of good governance.

Swim England is subject to the mandatory requirements of A Code for Sports Governance (the **SG Code**) and endeavours to operate an 'apply or explain' approach to the Charity Governance Code 2025 (the **Charity Code**).

The Annual Governance Statement provides Swim England's stakeholders (including members, employees, volunteers, supporters or partners) with an annual report on its governance performance.

Governance Structure

Swim England (company number 10931571; charity number 1175603) is a company limited by guarantee and registered as a charity. Its governing documents and filing history are published on the Companies House website [here](#). Details about Swim England's activities and governance can also be found on the Charity Commission website [here](#).

Swim England has three wholly owned subsidiary companies:

- Institute of Swimming Ltd (company number 1759210)
- Swim England Trading Ltd (company number 3001915)
- ASA Swimming Enterprises Ltd (company number 1636152).

Additionally, there are eight regions within England (East, East Midlands, London, North East, North West, South East, South West and West Midlands). These are all independent legal entities not owned by Swim England but affiliated to Swim England through its regulations in the [Swim England Handbook](#).

Organisational Purpose and Strategy

Purpose

Swim England's purpose, defined by its Articles of Association includes, for the benefit of the public, to:

- promote community participation in its Sports
- advance physical education through its Sports

- relieve people with physical, sensory and mental disabilities
 - through participation in sporting activities and programmes, and
 - assisting in the provision of training, facilities and equipment, particularly in relation to its Sports, and
- advance health and the saving of lives through teaching and training in water safety and swimming instruction.

Swim England has three categories of charitable purpose registered with the Charity Commission which are the advancement of education, the advancement of health or saving of lives and the advancement of amateur sport.

One Swim England strategy

Swim England's [One Swim England strategy](#) (the **Strategy**) was launched in November 2024 following the publication of the [Listening Report](#) followed by 26 roadshows in 13 locations through May to July of 2024. The strategy is an unwavering commitment to lead and serve an aquatics community to enable safe, enjoyable and successful experiences in water. At its heart are four values, set out below, and 18 goals which give us our roadmap for the future.

**We
include**

**We are
ambitious**

**We
collaborate**

**We
do what's right**

Swim England's measurement of its performance against its strategy is managed via a 'scorecard' of annual objectives, all aligned to the eighteen goals in the Strategy. Each objective is underpinned by an action plan and budget.

Swim England Reorganisation

During the Reporting Period, there has been a significant reorganisation (**Reorganisation**) which concluded in December 2025. The Reorganisation was necessary to align Swim England's structure to the Strategy, to change ways of working and to improve organisational efficiency (financial and operational).

The Reorganisation supports the delivery of the One Swim England strategy and provides a cultural shift towards improved governance which is necessary for future proofing our Sports. However, it is also recognised that the Reorganisation has some impact on the timing of delivery of some strategic projects as new ways of working are embedded.

Senior Leadership Team

During the Reporting Period there were some changes within the Senior Leadership Team (**SLT**). These changes were not directly related to the Reorganisation, which did not materially impact the SLT structure.

Two director level appointments were made during the period:

- Maria Papadopoulos as People Director
- Simon Davies as Director of Safe Aquatics

The Chief Operating Officer role became vacant due to the international relocation of an employee. It has been replaced with a new role of Director of Community Engagement. Recruitment for this role has been completed during the Reporting Period with the recruit to take office in the next reporting period. In all other respects, the existing departmental responsibilities have been retained, but with the function subsequently renamed 'Community Engagement' to better reflect its focus.

Governance Review

Overview

In October 2025, Swim England announced a comprehensive governance review. The purpose was to evaluate and shape the organisation's governance structures and procedures with the object of addressing some of the recommendations of the Listening Report as well as ensuring that Swim England is in the best place to support the delivery of the One Swim England strategy. Details of that announcement can be found [here](#).

The case for change recognises both the organisational context of Swim England as well as the current external environment where regulatory expectations, funding models and the broader sporting landscape are evolving at pace.

The governance review steering group produced a confidential report (the **Report**) in December 2025, reporting on five key Focus Areas:

- Board and Committee Effectiveness (national level) (A)
- Governance Accountability (national level) (B)
- Legal and Structural considerations (national level) (C)
- Regional and County Governance Structures (D)
- Membership Representation (Members' Forum Members and Member Nominated Directors) (E)

Swim England has begun the implementation of Focus Areas A-C. For Focus Areas D and E, the Report (or an extract of the Report) has been distributed to all employees, regional boards and county chairs/secretaries. Q1 of 2026 began with meaningful consultation (the **Consultation Phase**) about Focus Areas D and E with relevant stakeholders, including regions, counties and surveys of members. Consultation is taking place via a combination of meetings, workshops and surveys and will continue beyond the Reporting Period

No decisions have been made on Focus Areas D and E; next steps will be influenced by the Consultation Phase. Swim England is committed to transparency and engagement going forward and setting out a roadmap to implementation when the appropriate time comes.

Board and Committee Effectiveness

An independent Board evaluation (the **Independent Evaluation**) was conducted by the Sport and Recreation Alliance in April 2024 and reported on in the annual governance statement for the previous reporting period.

Following the Independent Evaluation and the findings of the Governance Review Steering Group in December 2025, Swim England is implementing changes designed to enhance its Board and Committee effectiveness. This includes reviewing terms of reference and agendas, completing committee self-evaluations, producing annual work planners including 'deep dive' schedules and refining methods of reporting between Committees and the Board. Whilst both the Independent Evaluation and the Governance Review Steering Group identified strength in the governance at Swim England, this further work including additional Board training will make Committees and the Board more efficient and strategically focused.

This work has begun in earnest and will be on-going into the next reporting period with successes and works in progress to be noted in the annual governance statement for next year.

Board

Role

The Board is collectively responsible for providing strategic leadership, overseeing Swim England's performance, and ensuring effective governance in line with the SG Code and the recommendations of the Charity Code. It sets Swim England's values, monitors risk and internal controls, and ensures that Swim England meets its legal and regulatory obligations. The Board also promotes transparency and accountability to stakeholders, while supporting long-term sustainable success. Terms of Reference for the Board can be found [here](#).

Meetings and Key Decisions

The Terms of Reference for the Board state that it will meet a minimum of six times a year, and on an ad hoc basis where required. The table below sets out the meetings held in the Reporting Period and, where appropriate, summarises the key decisions taken. Extracts of Swim England Board meetings for the Reporting Period can be found [here](#).

Date	Key Decisions
7 April 2025	Ratification of the approval of 2% pay increase for employees effective 1 April, 2025 Approval of the 2025 Budget Approval of the five year transformation budget Reappointment of Aysha Kidwai as an independent director for her second term Appointment of Sara Todd for her first term as a Member Nominated Director Shareholder resolution to appoint Rebecca Cox as the Director of SE Trading Ltd Appointment of Katie Walcott-Greenwood to the Nominations Committee
9 July 2025	Approval of audited accounts for the year ended December 2024 Appointment of Neil Booth to the ARG Committee Approval of chair performance appraisal Agreed to disband Oversight Committee
17 September 2025	Approval of Annual Governance Statement Approval of Commercial Ethics and Confidential Minutes policies Approve amending SE regulation 57
24 November 2025	Approval to proceed with purchase of Membership Management System Approval to proceed with new membership category pilot Approval of amendments to SE Handbook as requested
14 January 2026	2026 budget approved subject to contingencies Approval of moving into consultation phase of Governance Review Approval of Delegation of Authority Policy in interim Approval of Authorised Signatories Policy Approval of changes to Company Secretary and Charity Commission details Approval of delegated authority to CEO to act on behalf of SE in respect of any shareholder votes held by its subsidiary companies Approval of SEQ Statement of Compliance Ofqual and SEQ Statement of Non-Compliance Action Plan.
10 March 2026	Approval given to appoint Keith Munday as SOC Board representative to replace Neil Booth.
20 March 2026	Ad hoc meeting – No decisions taken.

Composition

The Board is comprised of a maximum of 12 Board members to include an independent Chair, three further independent directors, four Member Nominated Directors and two specialist directors. Swim England's CEO is also a Director. All independent appointments to the Board are made on merit in line with the skills required by the Board.

During the Reporting Period, Alex Cunningham (appointed on 10 March 2026), Howard Marsh (appointed on 1 November 2025), Keith Munday (appointed on 26 January 2026) and Max Sherrard (appointed on 16 February 2026) were appointed to the Board. Caroline Green and Alison Breadon stepped down on 31 December 2025 at the end of their second terms. Barry Saunders stepped down on 25 January 2026 at the end of his first term. At the end of the Reporting Period, the Board was made up of its maximum number of 12 people.

The following persons served as Board members during the Reporting Period:

Name	Role description	Date joined or left the Board (if applicable)	Board meetings attended ¹	Committees and attendances	Committee meetings attended ²
Richard Hookway	Chair	1 September 2025 (second term)	7/7	NC PC Regional Chairs	4/4 4/4
Neil Booth (Safeguarding & Welfare Champion)	Member Nominated Directors	1 January 2023 (second term)	5/7	ARG SOC OC	2/5 1/4 0
Joan Wheeler		1 January 2024 (second term)	7/7	SOC OC NC PC Aquatics GB Representative	6/6 0 4/4 4/4
Sara Todd		7 April 2025 (first term)	7/7	NC Ad Hoc Aquatics GB Representative Regional Chairs	1
Keith Munday		26 January 2026 (first term)	2/2	SOC	2/2

¹ Meetings attended are expressed by reference to the total number of meetings that occurred during the term of the individual member of the Board.

² Meetings attended are expressed by reference to the total number of meetings that occurred during the term of the individual member of the Board.

Barry Saunders (UK Anti Doping champion)		25 January 2026 (end of first term)	5/5			
Caroline Green (Senior Independent Director)	Independent Directors and Specialist Directors	31 December 2025 (end of second term)	2/4	Aquatics GB Representative		
Alison Breadon		31 December 2025 (end of second term)	4/4	ARG NC Ad Hoc	4/4 1	
Alex Cunningham (safeguarding)		10 March 2026 (first term)	2/2			
Aysha Kidwai (ED&I champion)		10 May 2025 (second term)	5/7	IOS Ltd	4/4	
Howard Marsh		1 November 2025 (first term)	4/4	ARG	3/3	
Carrie Ryan (Commercial champion)		1 April 2024 (first term)	7/7	SE Trading Ltd	3/3	
Max Sherrard (legal and governance)		16 February 2025 (first term)	2/2			
Katie Walcott-Greenwood		14 December 2022 (first term)	5/7	PC NC	4/4 4/4	
Andy Salmon		Swim England CEO	19 February 2024	7/7	SE Trading Ltd	3/3

Director Recruitment

Each of the Independent Non-Executive Directors appointed during the Reporting Period were appointed following an open recruitment process.

Recruitment processes for the two Member Nominated Directors appointed during the Reporting Period were completed in accordance with the provisions set out in Swim England's Articles of Association.

Following an open recruitment process for each of the Independent Non-Executive Directors at the time of their appointment, the process for appointing a new Senior Independent Director to replace Caroline Green is being carried out by the Nominations Committee. The

Nominations Committee is expected to make a recommendation to the Board shortly after the end of the Reporting Period.

Director Remuneration

In the Reporting Period no remuneration was paid to Non-Executive Board members. The remuneration of the CEO, being the only executive Board member, is reported with the annual consolidated financial accounts available at [Companies House](#).

Committees reporting to the Board

The Board has established the following Committees, which report directly to the Board. Whilst Swim England is in the process of updating all Committee Terms of Reference, each Committee has existing Terms of Reference which identify its responsibilities and any powers delegated to it by the Board. A new Delegation of Authority has also been approved by the Board and implemented in this Reporting Period.

In addition to the strategic Committees of the Board, Swim England operate a number of forums and groups providing support to the Committees covering areas including the Sports, water safety and health and safety.

Committee	Membership	Role	Meetings in the Reporting Period
Audit, Risk and Governance Committee (ARG)	The Terms of Reference for this Committee specify at least four members, at least two of whom are Board members. The Chair must be an Independent Board director, and not the Chair of the Board.	Oversees external audit and any internal audit system, SG Code and Charity Code compliance, risk management process, prevention of fraud.	5
Nominations Committee (NC)	Chair of the Board, two independent non-executive Board members, one Member Nominated Director.	Leads process for Board appointments, onboarding and evaluation	4
People Committee (PC)	Three non-executive Board Directors (or as revised by the Board from time to time)	Oversee the People Plan, succession planning for senior roles, pay policies, pension arrangements, and people policies.	4
Sport Operations Committee (SOC)	Two Member-Nominated Directors (one of whom is to chair this committee), a Regional Chair (not also a Board member), six	Advice on operational development of clubs, counties and regions; overseeing aquatics pathways from learn to swim onwards; reviews volunteer	6

	Swim England members (skills-based recruitment), a youth advisory panel representative, and relevant Senior Leadership Team members.	development; reviews rules and regulations.	
Oversight Committee (OC)	Four independent members with experience across a variety of areas, two Swim England Board members, and up to three members of the Senior Leadership Team.	Temporary committee to oversee the national governing body's safeguarding, welfare and culture plan - Heart of Aquatics.	0; officially disbanded in July 2025

In this Reporting Period, Committee self evaluation has been completed for ARG and new Terms of Reference are a work in progress. The Board has also approved the principle of merging the function of the NC into the PC subject to receiving Members' Forum approval to change the Articles of Association at the 2026 annual general meeting. SOC has begun a self evaluation which will be completed soon after the end of the Reporting Period.

In the last annual governance statement it was reported that the OC (a short term oversight committee reporting to the Board on a temporary basis) was on hold. The OC was composed of independent specialists with expertise in safeguarding and welfare, organisational culture and judicial processes. The OC remained on hold in the Reporting Period and was formally disbanded by the Board in July 2025; Safe Aquatics matters are now reported directly to the Board by the Director of Safe Aquatics, with full accountability for these areas sitting with the Board. Further changes to the structure of the Committees will be proposed to the Members' Forum for approval at the annual general meeting in May 2026.

Annual General Meeting

From a corporate governance perspective, members of Swim England comprise a "Members Forum" as set out in its Articles of Association. They cannot override the powers of the Board but have reasonable rights to consultation and constructive challenge. They meet once a year through the annual general meeting (the **AGM**), which was last held on 20 May 2025. Once approved for distribution, all AGM minutes can be found on the Swim England website [here](#).

Policies and processes

SG Code compliance

Swim England is compliant with the mandatory requirements in Tier 3 of the SG Code. Sport England, the body responsible for overseeing Swim England's compliance with the Code, last assessed partners against a Statement of Continued Compliance in 2023.

Review of governance practices and procedures

In compliance with the SG Code, the following practices and procedures were reviewed and approved by the Board in the Reporting Period.

Practice/procedure reviewed	SG Code requirement	Last reviewed
Policies	In line with organisation's review schedule	Policies reviewed by rotation
Financial policies and procedures	In line with organisations review schedule	Rolling process in place, scheduled to be reviewed every three years
Financial Forecast	4 year minimum	5 year outlook prepared in December, approved in January on an annual basis
Stakeholder Strategy	At least annually	Included within overall strategy and reviewed annually as part of the implementation planning process
Treasury policy	4 year minimum	July 2022
Complaints Policy	4 year minimum	July 2025
Safeguarding and Welfare regulations in Swim England handbook	According to schedule	September 2024; under review as at the end of the Reporting Period
Judicial Regulations in Swim England handbook	According to schedule	September 2024; under review as at the end of the Reporting Period

Risk Management

ARG oversees risk management and has responsibility for audit processes, fraud prevention and policy compliance. A strategic risk register which uses a methodology of impact and probability is reviewed at least quarterly by the SLT, ARG and twice a year by the Board. Strategic risks are rated, assigned Committee, Board or SLT owners and tracked against mitigation plans. Risk management is also embedded within safeguarding arrangements through the Safe Aquatics team and Swim England has demonstrated in this Reporting Period a strong commitment to learning from incidents and continuous improvements. This work will continue beyond this Reporting Period.

Towards the end of the Reporting Period, Swim England implemented its first strategic risk register deep dive 'test case' with ARG. The aim is that each assigned owner (Board, Committee or SLT) of a strategic risk will include one of its strategic risks on its annual planner for each meeting, with the intention that a 'deep dive' on every strategic risk is completed at least once a year.

In the last annual governance statement, it was indicated that going forward, strategic risks will be reported on in the Annual Governance Statement rather than the Annual Report. Given the difference between the reporting period for the consolidated financial statements

and this Reporting Period, key strategic risks have again been reported on in the Trustee Report attached to the consolidated financial accounts of the Company for the year ended 31 December 2025. Key strategic risks identified in the strategic risk register for that period are:

- Harm to the Sports and/or Swim England because of historic safeguarding cases
- Closure of pools, whether because of high energy costs, energy supply issues, local governance financial difficulties or any other reason
- Historic under investment in digital infrastructure, member experience, school swimming and lifelong participation, leading to a decline in participation, loss of engagement and related revenues
- Prohibitive insurance costs or reduced availability could leave the organisation financially exposed.

Following the process for risk management identified above, these risks are being actively managed by their owners. In addition to the strategic risk register, operational risks are managed in separate operational risk registers.

Complaints and Whistleblowing

During the Reporting Period Swim England have received one whistleblowing concern and 18 complaints falling within the scope of its complaints policy. These have been allocated to a member of the SLT to investigate. As of the end of the Reporting Period, 10 complaints remain ongoing and are being investigated. Three complaints are paused whilst the safeguarding investigations are completed.

Serious Incident Reports

Swim England has a secure process in place to track and record serious incidents and 'near misses'. Serious incidents may fall within categories such as safeguarding, financial crimes, data breach or reputational damage. Serious incidents are reported to the Charity Commission.

Swim England has also set up an operational group amongst senior operational leaders to monitor serious incidents, identify trends from serious incidents and 'near misses' and to ensure collaborative working across the organisation with a view to minimising serious incidents in the future.

During the Reporting Period, Swim England made three serious incident reports to the Charity Commission. All reports related to safeguarding and are being actively managed by the Safe Aquatics team.

Safe Aquatics

During the Reporting Period, Swim England appointed a new Director of Safe Aquatics.

Swim England also announced the appointment of the NSPCC to conduct an independent desktop review of historical safeguarding cases referred to or handled by Swim England between January 2003 and December 2022. That announcement can be found [here](#). This review is expected to be completed by the end of summer 2026.

Changes have been made to the way that the Safe Aquatics team deal with issues referred to them. There is enhanced scrutiny at the first point of contact, overseen by a manager. This ensures that risk can be managed earlier and more systematically. Resources have also been aligned to Swim England regions, meaning that early preventative work can be undertaken. This will help to prevent issues escalating and build more collaborative, sustainable relationships.

Equality, Diversity and Inclusion (EDI)

Swim England is fully committed to the principles of equality, diversity and inclusion and to creating a much broader and diverse environment for a broad aquatic community representative of the society in which it sits. We work with our members but also our wider aquatic participants, alongside a wide range of partners and stakeholders, to enable swimming and aquatics to be accessible, progressive and achievable for all, at all levels and within and across all types of communities.

Workforce (in all its forms) is a key driver of equality, diversity and inclusion effort due to its direct correlation to participation and engagement. Swim England is committed to increasing the diversity of its employees, volunteers (including Board and committee members), teachers and coaches. We will be expanding our work focused on driving more women, people with disabilities, people from lower socio-economic communities and people from ethnically diverse communities to become more actively involved in all aspects of our aquatics workforce.

Swim England have a Diversity and Inclusion Action Plan (**DIAP**) which was last updated in July 2025. The Reorganisation has impacted progress with the DIAP in the first quarter of this year but new employee resource will be in place soon after the Reporting Period to renew Swim England vigour in this area. Our new resourcing approach will see a more distributed model of EDI leadership and delivery where multiple people and teams will lead our work, as opposed to having a singular national resource. Further information about the DIAP and its updates can be found on Swim England's [dedicated webpage](#). Swim England is committed to providing updates to its stakeholders against the DIAP.

Key areas of operational work in this space include:

- Swim England announcing its strategic partnership with Neurodiverse Sport [here](#). This partnership is designed to strengthen neuro-inclusive practice across aquatics through a two year test and learn programme. This collaboration aligns closely with the One Swim England strategy, reinforcing Swim England's commitment to serving the sector, leading national projects with key partners to strengthen inclusive practice across sport and support organisations to better understand, engage and respond to diverse audiences
- Swim England developing and launching a new Place-Based approach focusing on 12 disadvantaged communities across England where an enhanced local offer of support for swimming and aquatics development and delivery will be facilitated. In these communities, we will use swimming and aquatics to tackle inequalities, physical inactivity and work towards embedding aquatics into local ecosystems.

People Plan

In this Reporting Period, Swim England has produced the second edition of its People Plan. This edition can be found [here](#). It is informed by the findings of the Listening Report and roadshows and recognises a commitment to putting people at the heart of everything we do. The plan applies to everyone who contributes to aquatics including employees, volunteers, educators, coaches, teachers, tutors, officials, partners and leaders. Swim England is committed to further develop its People Plan in the next reporting period.

Environmental Social Responsibility

Swim England is committed to doing everything possible to protect our natural resources, recognising that sustainability is crucial not only for preserving the environment but also for ensuring that future generations can continue to enjoy and benefit from aquatics. Through our work on the Clean Water Sports Alliance we continue to lobby and advocate for cleaner waters to campaign against pollution from sewage, agriculture and other sources. We have engaged with a leading specialist environmental sustainability agency to support us with our own organisational sustainability strategy which we will be publishing in the next reporting period.