

SWIM TAYKA

Safeguarding Children Policy

SwimTayka Safeguarding Children Policy

Controlled Document 02
Issue 2.0 - September 2026

Charity: SwimTayka
Registered Charity Number: 1176079
Policy owner: Board of Trustees
Operational lead: Designated Safeguarding Lead
Safeguarding contact: safeguarding@swimtayka.org
SwimTayka emergency contact: +44 7881 458080
Approval date: [to be confirmed by Trustees]
Next review: Within 12 months of approval, or earlier where required

1. Introduction

SwimTayka exists to prevent drowning by providing children with swimming, water safety and drowning prevention education.

Children's safety and wellbeing come before programme delivery, fundraising, reputation, partnerships or any other organisational consideration.

SwimTayka works with children in the United Kingdom and internationally, often in communities where children have regular contact with rivers, lakes, swimming pools, beaches and the sea.

This work brings trustees, staff, volunteers, swimming instructors, local partners and other adults into positions of responsibility and trust around children. SwimTayka recognises the particular safeguarding responsibilities this creates.

We have zero tolerance of abuse, exploitation, harassment or deliberate breaches of safeguarding standards.

Everyone working for or representing SwimTayka has a responsibility to safeguard children and to report concerns.

If something does not feel right, report it. You do not need proof before raising a safeguarding concern.

2. Purpose of this policy

This policy explains how SwimTayka will:

- protect children who participate in, visit or otherwise come into contact with SwimTayka activities
- prevent abuse and reduce safeguarding risks
- recruit suitable staff, trustees, volunteers and instructors
- set appropriate standards of behaviour
- recognise possible abuse or neglect
- respond when a child makes a disclosure
- respond to safeguarding concerns and allegations
- manage concerns about people working or volunteering with children
- work safely with overseas partners
- share safeguarding information appropriately
- meet relevant UK regulatory and reporting requirements
- ensure safeguarding concerns are properly recorded and reviewed.

This policy should be read alongside SwimTayka's:

- Volunteer Handbook
- Code of Conduct
- Media and Branding Guidelines
- Privacy Policy
- Health and Safety arrangements
- programme risk assessments
- partnership agreements
- safer recruitment procedures
- whistleblowing and complaints arrangements.

3. Who this policy applies to

This policy applies to everyone carrying out activities for, with or on behalf of SwimTayka, including:

- trustees
- employees
- contractors and consultants
- programme managers
- swimming instructors
- volunteer swimming instructors
- other volunteers
- ambassadors
- photographers and media representatives
- partner organisations
- partner staff and volunteers where they are working with SwimTayka

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- anybody else authorised to represent SwimTayka or have contact with children through our activities.

Compliance with this policy is a condition of participation in SwimTayka activities.

Serious or deliberate breaches may result in removal from a programme, termination of a volunteer or contractual relationship and referral to relevant authorities.

4. Definition of a child

For the purposes of this policy, a **child is anyone under the age of 18.**

This includes 16 and 17-year-olds regardless of whether they:

- live independently
- are employed
- are married or in a relationship
- have left school
- are themselves a parent
- appear mature or independent.

Adults working with SwimTayka must maintain appropriate professional boundaries with all children under 18.

5. What safeguarding means

Safeguarding is broader than responding to abuse.

For SwimTayka, safeguarding includes:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring children participate in SwimTayka activities in circumstances consistent with safe and effective care
- taking action to enable children to have the best possible outcomes
- creating environments where children feel safe, respected and listened to
- reducing opportunities for abuse, exploitation and inappropriate behaviour.

Child protection is part of safeguarding and concerns the action taken when there is reason to believe a particular child is suffering or is likely to suffer significant harm.

6. Our safeguarding principles

SwimTayka will apply the following principles.

The welfare of the child comes first

The child's immediate safety and welfare are the primary consideration in safeguarding decisions.

Safeguarding is everyone's responsibility

Every trustee, staff member and volunteer is responsible for identifying and reporting concerns.

Children will be listened to

Children's views will be taken seriously and treated with respect.

We will not discriminate

Safeguarding applies equally regardless of:

- sex
- gender
- race
- nationality
- disability
- language
- religion
- culture
- sexual orientation
- family circumstances
- economic status
- immigration or refugee status.

Children with disabilities, communication difficulties or other additional needs may face increased safeguarding risks and may need additional support to communicate concerns.

We will act even where information is incomplete

A person does not need to prove that abuse has occurred before reporting a concern.

We will not investigate allegations ourselves

SwimTayka personnel should gather enough information to understand the immediate concern and protect the child, but must not attempt to conduct a child protection or criminal investigation.

Confidentiality must never be promised where a safeguarding concern exists.

7. Governance and responsibility

7.1 Board of Trustees

The Board of Trustees has collective responsibility for safeguarding within SwimTayka.

The trustees are responsible for ensuring:

- appropriate safeguarding policies and procedures are in place
- safeguarding is considered within organisational risk management
- appropriate resources are available
- safeguarding arrangements are monitored
- serious concerns are appropriately escalated
- regulatory reporting requirements are considered
- safeguarding is included within due diligence for partner organisations
- appropriate safer recruitment procedures are followed.

Appointment of a safeguarding lead does not remove the trustees' collective responsibility.

7.2 Designated Safeguarding Lead

SwimTayka will appoint a Designated Safeguarding Lead, referred to within this policy as the DSL.

The DSL is responsible for:

- receiving safeguarding concerns
- providing safeguarding advice
- deciding appropriate referrals in consultation with statutory authorities where necessary
- maintaining safeguarding records
- coordinating safeguarding activity
- supporting programme managers
- advising trustees
- ensuring appropriate referrals to statutory agencies are considered
- monitoring safeguarding trends and recurring concerns
- supporting policy reviews and training.

Contact:

safeguarding@swimtayka.org

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7.3 Deputy safeguarding arrangements

SwimTayka will maintain an identified deputy or alternative safeguarding contact who can act if the DSL is unavailable or implicated in a concern.

The names and current contact details of safeguarding personnel will be maintained by SwimTayka separately from this controlled policy so that personnel changes do not leave the policy out of date.

7.4 If the DSL is implicated

Where a concern involves the DSL, it must be reported directly to the Chair of Trustees or another independent trustee.

Where the Chair is implicated, it should be reported to another trustee who is not involved.

Nobody should be required to report an allegation to the person who is the subject of that allegation.

Where necessary, concerns may be reported directly to the appropriate statutory safeguarding authority or police.

8. Programme safeguarding responsibility

Every SwimTayka programme must have:

- an identified programme lead
- an identified local safeguarding contact
- current emergency contact details
- details of appropriate local safeguarding and child protection authorities
- local police and emergency information
- an agreed escalation procedure
- an appropriate programme risk assessment.

This information must be made available to volunteers before or at the start of the programme.

Safeguarding concerns occurring overseas must also be reported to SwimTayka.

Reporting something to a local partner does not remove the requirement to inform SwimTayka.

9. International programmes

SwimTayka works across different countries, cultures and legal systems.

The fact that a particular practice may be locally accepted does not mean that SwimTayka will consider it acceptable.

Our minimum safeguarding standards apply to all SwimTayka activities.

Where local law or safeguarding requirements provide greater protection for children, those higher requirements must be followed.

Before approving an overseas programme, SwimTayka should understand:

- applicable local safeguarding arrangements
- reporting requirements
- emergency procedures
- relevant police or child protection contacts
- how allegations concerning adults working with children are handled
- any particular safeguarding risks affecting that community.

Where reporting to a particular authority may itself create a serious risk to the child, SwimTayka's DSL must seek appropriate specialist advice and determine the safest lawful course of action.

10. Partner organisations

SwimTayka frequently delivers programmes in partnership with local organisations.

Safeguarding responsibility does not end because delivery has been entrusted to another organisation.

Before working with an organisation that has contact with children, SwimTayka will undertake proportionate safeguarding due diligence.

This should include consideration of:

- safeguarding policies
- safer recruitment practices
- background checking arrangements
- safeguarding training
- reporting procedures
- safeguarding leadership
- complaints arrangements
- previous serious safeguarding concerns where known
- local legal requirements.

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Partners should appoint an appropriate safeguarding contact.

Partnership agreements should make safeguarding responsibilities clear, including:

- reporting arrangements
- responsibilities of each organisation
- information sharing
- handling allegations
- access to records where appropriate
- escalation arrangements
- monitoring.

SwimTayka may pause or terminate a programme where it believes children cannot be adequately protected.

11. Safer recruitment

Safeguarding starts before somebody is allowed to work with children.

SwimTayka will use safer recruitment procedures proportionate to the role.

These may include:

- application forms
- interviews
- identity verification
- checking relevant qualifications
- references
- exploring unexplained gaps or concerns where appropriate
- criminal record checks
- DBS checks
- Children's Barred List checks where legally permitted and required
- overseas criminal record or safeguarding checks where appropriate.

Applicants must provide accurate information.

Deliberately concealing information relevant to safeguarding may result in removal from the recruitment process or programme.

A criminal conviction will not automatically prevent somebody from volunteering unless legislation prohibits them from undertaking the role. Relevant information will be considered through an appropriate risk assessment.

12. DBS and regulated activity

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SwimTayka will assess each UK role to determine whether it constitutes regulated activity with children and what level of DBS check is legally available and appropriate.

From 1 September 2026, the previous supervision exemption for regulated activity with children no longer applies in England and Wales.

This means that an individual who teaches, trains, instructs, cares for or supervises children sufficiently frequently may undertake regulated activity even where their work is supervised by another adult.

This is particularly relevant to SwimTayka swimming instructors and assistant instructors.

Where a role meets the legal definition of regulated activity, SwimTayka will obtain an appropriate **Enhanced DBS check including Children's Barred List information**, subject to the applicable eligibility rules.

It is unlawful for a barred person to undertake regulated activity with children.

It is also unlawful knowingly to allow a barred person to undertake regulated activity.

Role eligibility must be reassessed where a person's duties change.

13. Overseas volunteers and criminal-record checks

Where a volunteer has lived or worked outside the UK, a DBS check may not provide a complete picture.

SwimTayka may therefore require appropriate overseas criminal-record information or equivalent safeguarding checks.

The type of evidence required will depend on:

- the person's country of residence
- previous countries of residence
- the nature of their role
- available official checking systems.

A lack of a formal checking system must not simply be treated as evidence that there is no safeguarding risk.

Alternative safeguarding measures and a documented risk assessment must be considered.

14. Safeguarding training

Safeguarding training is mandatory for people who work directly with children through SwimTayka.

Training must be completed before unsupervised participation in programme activities.

Training should be proportionate to responsibility.

As a minimum:

- volunteers working with children must receive basic safeguarding training
- programme managers and people with greater safeguarding responsibilities should receive enhanced training
- the DSL and deputies must receive appropriate designated safeguarding lead training.

Safeguarding briefings should also cover:

- local reporting arrangements
- professional boundaries
- responding to disclosures
- online communication
- photography
- physical contact
- aquatic-specific risks.

Safeguarding knowledge will be refreshed regularly and when significant requirements change.

15. Code of conduct and professional boundaries

Adults working with children through SwimTayka occupy a position of trust.

They must behave in a way that protects children and themselves.

Adults must:

- treat children respectfully
- use appropriate language
- maintain appropriate physical and emotional boundaries
- work openly wherever possible
- challenge bullying, discrimination and harmful behaviour
- follow supervision requirements

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- report concerns
- follow this policy and local safeguarding arrangements.

Adults must never:

- engage in sexual activity with a child
- pursue a sexual or romantic relationship with somebody under 18 participating in or connected with the programme
- make sexualised comments or jokes
- deliberately expose children to sexual material
- groom or manipulate a child
- use corporal punishment
- humiliate, intimidate or deliberately frighten a child
- exchange inappropriate messages or images
- ask a child to keep inappropriate secrets
- develop secretive or exploitative relationships
- give preferential treatment intended to create dependency
- use alcohol or drugs in a way that compromises their ability to supervise children
- behave in a way that places a child at unreasonable risk.

A child appearing to consent to inappropriate behaviour does not make that behaviour acceptable.

16. One-to-one situations

SwimTayka will minimise situations where one adult is alone and unobserved with one child.

Activities should normally be organised so that:

- more than one adult is present
- groups of children participate together
- activities can be observed by others.

There may be occasions where one-to-one interaction cannot reasonably be avoided.

Where this occurs:

- it should take place openly where possible
- another responsible adult should know it is happening
- the reason should be legitimate
- the interaction should last no longer than necessary.

An emergency situation may require an adult to act alone to protect a child's life or safety. The child's immediate safety takes priority.

The circumstances should be recorded and reported afterwards where appropriate.

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17. Swimming lesson supervision

SwimTayka's normal maximum teaching ratio is:

1 instructor to 5 children.

A lower ratio must be used where required by:

- children's age
- swimming ability
- disability or additional needs
- water conditions
- open-water conditions
- facility rules
- instructor competence
- local requirements
- programme risk assessment.

A ratio should never be increased merely because resources are limited.

Children must receive appropriate safety instructions before entering the water.

Instructors must maintain active supervision and should not become distracted by:

- mobile phones
- photography
- unnecessary conversations
- administrative work.

The presence of a lifeguard does not remove the instructor's responsibility for the children they are teaching.

18. Appropriate physical contact

Swimming instruction sometimes requires physical contact for:

- safety
- rescue
- demonstrating a technique
- helping a child achieve the correct body position
- assisting entry or exit from the water.

Any physical contact must be:

- necessary
- appropriate
- proportionate
- related to teaching or safety
- undertaken openly.

Where reasonably possible, the instructor should explain what they are going to do before touching the child.

Children's wishes should be respected unless immediate physical intervention is necessary to prevent injury, drowning or another serious danger.

Unnecessary or inappropriate physical contact is prohibited.

19. Changing rooms, toilets and showers

Changing facilities present particular safeguarding risks.

Adults must:

- respect children's privacy
- avoid being alone with a child in a changing area where reasonably possible
- avoid unnecessary presence while children are changing
- follow facility-specific safeguarding arrangements
- never take photographs or videos in changing rooms, toilets or showers.

Adults should not change or shower alongside children participating in a SwimTayka programme where this can reasonably be avoided.

Any concern about behaviour in changing facilities must be reported.

20. Transport

One adult should not routinely transport a child alone in a vehicle unless they are that child's parent, guardian or another arrangement has been specifically authorised.

Programme transport should wherever possible involve:

- multiple children
- more than one adult, or
- an agreed and documented transport arrangement.

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Where an emergency makes one-to-one transport unavoidable, the programme lead should be informed as soon as reasonably possible and the circumstances recorded.

Seatbelts, appropriate vehicle safety requirements and local transport law must be followed.

21. Overnight accommodation

Adults participating in SwimTayka programmes must not share sleeping accommodation with an unrelated child unless specifically required for the child's safety and formally authorised under an appropriate safeguarding arrangement.

Accommodation arrangements involving children must be risk assessed.

Privacy around:

- sleeping
- washing
- dressing
- toileting

must be respected.

22. Online communication and social media

Safeguarding responsibilities apply online as well as face to face.

Adults representing SwimTayka must not routinely communicate privately with a child using:

- personal social media
- personal messaging apps
- disappearing-message services
- personal email accounts.

Communication with children should normally take place:

- through parents or guardians
- through the partner organisation
- using an approved organisational communication channel
- in an appropriate group setting.

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If a child sends an inappropriate or concerning message to a volunteer, the volunteer must not continue the conversation unnecessarily.

They should preserve relevant information, not forward it unnecessarily, and report it to the safeguarding lead.

Sexual images of children must never be copied, downloaded, forwarded or shared as evidence.

23. Photography and video

Photographs and video involving children must comply with SwimTayka's Media and Branding Guidelines and data protection requirements.

Appropriate consent must be obtained.

Where possible this should include:

- appropriate parental or guardian permission
- the child's own agreement appropriate to their age and understanding.

A child who does not wish to be photographed should not be pressured.

Images must not:

- portray a child in a degrading or humiliating way
- unnecessarily expose a child's body
- be taken in changing rooms, showers or toilets
- reveal sensitive safeguarding information
- identify a child in a way that places them at risk.

Images should be collected and stored through approved arrangements.

Volunteers must not retain children's photographs for unrelated personal use.

24. Recognising abuse and safeguarding concerns

Abuse can occur:

- at home
- within an organisation
- within a community

- online
- between adults and children
- between children.

The person causing harm may be:

- a family member
- another child
- a volunteer
- an instructor
- an employee
- a trusted community member
- a stranger
- somebody known only online.

Safeguarding concerns may involve more than one form of harm.

25. Physical abuse

Physical abuse includes deliberately causing physical harm to a child.

Examples can include:

- hitting
- shaking
- throwing
- poisoning
- burning
- scalding
- drowning
- suffocating
- inappropriate physical restraint
- deliberately causing or fabricating illness.

Physical discipline of children is not permitted within SwimTayka programmes.

26. Emotional abuse

Emotional abuse is persistent behaviour that has a severe or harmful effect on a child's emotional development.

It can include:

- humiliation

- rejection
 - intimidation
 - threats
 - bullying
 - discrimination
 - persistent criticism
 - controlling behaviour
 - deliberately frightening a child
 - preventing appropriate social interaction
 - making a child feel worthless or unloved.
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27. Sexual abuse

Sexual abuse involves forcing, enticing, manipulating or exploiting a child to participate in sexual activity.

It may involve physical contact or non-contact activity.

Examples include:

- sexual touching
- sexual assault
- encouraging sexual behaviour
- sexualised messaging
- showing children pornography
- involving children in sexual images
- grooming
- sexual exploitation
- watching sexual activity
- encouraging a child to behave in a sexually inappropriate way.

A child may not understand that what is happening is abuse.

Sexual abuse may occur in person or online.

28. Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs where this is likely to cause serious impairment to the child's health or development.

It may include failure to provide appropriate:

- food
- clothing

- shelter
- supervision
- medical care
- protection from danger
- emotional care.

SwimTayka works in communities experiencing poverty and limited resources.

Poverty alone must not be treated as evidence of parental neglect.

Concerns should focus on the child's welfare and the circumstances affecting their care rather than making assumptions based on economic status.

29. Child-on-child abuse

Children can harm other children.

This may include:

- bullying
- physical assault
- sexual harassment
- sexual violence
- harmful sexual behaviour
- coercion
- exploitation
- sharing sexual images
- online abuse
- discrimination.

Child-on-child abuse must not be dismissed as:

- banter
- normal behaviour
- children being children
- part of growing up.

Concerns must be taken seriously and reported.

Both the child who may have been harmed and the child whose behaviour has caused concern may require safeguarding support.

30. Exploitation, grooming and trafficking

Staff and volunteers should remain alert to:

- child sexual exploitation
- child criminal exploitation
- trafficking
- modern slavery
- grooming
- coercive control.

Children may not recognise themselves as victims.

A child apparently receiving something in return for abusive or exploitative activity does not make that activity consensual or acceptable.

31. Domestic abuse and relationship abuse

Children may experience harm by:

- witnessing domestic abuse
- living in a household affected by domestic abuse
- experiencing coercive or controlling behaviour
- experiencing abuse within their own teenage relationships.

These are safeguarding concerns and should be reported appropriately.

32. Possible indicators of abuse

Possible indicators may include:

- unexplained injuries
- repeated injuries
- significant behavioural changes
- becoming unusually withdrawn
- unusual aggression
- fear of a particular person
- inappropriate sexual knowledge or behaviour
- significant changes in eating

- significant changes in hygiene
- persistent tiredness
- signs of distress
- sudden avoidance of activities
- unexplained gifts or money
- concerning online behaviour.

No single indicator proves abuse.

Likewise, the absence of visible signs does not mean abuse has not occurred.

33. What to do if you are concerned about a child

If you have a safeguarding concern:

1. Consider immediate safety

If the child is in immediate danger, take reasonable action to protect them.

Contact the appropriate local emergency service where necessary.

In the UK, call **999** where there is immediate danger or an emergency.

2. Do not investigate

Do not:

- interview witnesses
- confront the suspected person
- attempt to establish guilt
- search through a child's phone or personal belongings
- ask repeated or leading questions.

3. Record what you know

Make a factual record as soon as possible.

4. Report it

Report the concern immediately, or as soon as reasonably possible, to the programme safeguarding contact and SwimTayka DSL.

safeguarding@swimtayka.org

Where the normal safeguarding contact is implicated, bypass them and use the alternative escalation route.

5. Follow safeguarding advice

The DSL will decide what additional referrals or protective action are necessary.

34. Responding when a child tells you about abuse

A child may disclose abuse directly or may begin to tell you something gradually.

If a child talks to you:

Do

- remain calm
- listen carefully
- give the child your full attention
- allow them to speak at their own pace
- take them seriously
- acknowledge that they have done the right thing by telling you
- explain that you may need to tell someone who can help
- use the child's own words when recording what was said
- report the concern promptly.

Do not

- promise confidentiality
- express disbelief
- blame the child
- react with shock or anger
- ask leading questions
- ask the child to prove what happened
- investigate
- confront the alleged person
- repeatedly ask the child to retell their account.

If clarification is necessary for immediate safety, use only simple, open questions such as:

- "Tell me what happened."
- "Is there anything else you want to tell me?"
- "Are you safe now?"

Questions should not suggest an answer.

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35. Recording a safeguarding concern

A safeguarding record should be made as soon as possible.

It should include:

- child's name where known
- date and time
- location
- people present
- nature of the concern
- what the child said, using their own words where possible
- observations
- immediate action taken
- people informed
- date and time of reporting
- name of person making the record.

Records should distinguish clearly between:

- fact
- observation
- information provided by another person
- professional judgement.

The record must be signed or otherwise attributable to its author and dated.

Safeguarding records must be stored securely and separately from routine volunteer or programme information with access restricted to those who require it.

36. Information sharing and confidentiality

Safeguarding information is confidential, but it is not secret.

Information should normally only be shared with people who have a legitimate safeguarding reason to receive it.

However, data protection law must not be used as a reason to avoid sharing information when sharing is necessary and proportionate to protect a child.

Consent is not always required before sharing personal information for safeguarding purposes.

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When deciding whether information should be shared, consider:

- the child's safety
- necessity
- proportionality
- relevance
- accuracy
- security
- who genuinely needs the information.

Where appropriate and safe, children and parents should be informed about information sharing.

Information should not be disclosed if doing so is likely to:

- increase risk to the child
- place another person in danger
- prejudice a police or safeguarding investigation.

37. Speaking to parents or guardians

SwimTayka will normally work openly with parents and guardians.

However, volunteers must not automatically contact a parent or guardian about a safeguarding concern.

Advice should first be sought from the safeguarding lead where there is reason to believe informing the parent could:

- increase the risk to the child
- place another person at risk
- interfere with an investigation
- lead to evidence being destroyed
- result in the child being removed from protection
- otherwise compromise safeguarding action.

38. Concerns about a SwimTayka worker, volunteer or representative

Any safeguarding concern about a person working or volunteering with children must be reported immediately.

This includes information suggesting that a person has:

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- harmed or may have harmed a child
- possibly committed a criminal offence involving a child
- behaved towards a child in a way that indicates they may pose a risk of harm
- behaved outside SwimTayka in a way that raises concern about their suitability to work with children.

This applies to behaviour in both personal and professional life where it may be relevant to safeguarding.

39. Allegations management

When an allegation is made against a member of staff, trustee, volunteer, instructor, contractor or other person working with children:

SwimTayka must not conduct its own safeguarding investigation before appropriate external advice has been obtained.

Initial action should focus on:

- protecting the child
- reporting the allegation
- preserving information
- avoiding contamination of evidence
- seeking appropriate statutory safeguarding advice.

For an allegation arising in England that meets the appropriate threshold, the DSL should contact the relevant **Local Authority Designated Officer - LADO**, or local designated allegations arrangements, without delay and normally within one working day.

The police or children's social care may also need to be contacted.

For allegations in Wales, SwimTayka will follow the Wales Safeguarding Procedures and relevant LADO/Designated Officer for Safeguarding arrangements.

For overseas programmes, the DSL will work with the appropriate local safeguarding or law-enforcement authority and the relevant partner organisation.

40. Suspension or temporary removal from duties

Suspension must not be treated as automatic proof that an allegation is true.

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However, SwimTayka may immediately remove somebody from contact with children where this is necessary to manage risk.

Possible interim arrangements include:

- temporary suspension
- temporary removal from child-facing duties
- increased supervision
- reassignment to non-child-facing activities
- removal from the programme location.

Decisions should be based on safeguarding risk and, where appropriate, advice from statutory authorities.

The safety of children takes priority.

The rights and welfare of the person who is the subject of an allegation must also be treated fairly and appropriately.

41. Do not interview the accused or witnesses

Volunteers, programme managers and partner organisations must not conduct their own investigative interviews where this may interfere with an official safeguarding or criminal investigation.

This includes interviewing:

- the child
- the alleged person
- witnesses
- other children.

The safeguarding lead should take advice from the relevant authorities about what internal enquiries are appropriate and when they may begin.

42. Low-level concerns

Not every concern about an adult will meet the threshold for statutory referral.

However, behaviour that appears inconsistent with SwimTayka's Code of Conduct should still be reported.

Examples may include:

- favouritism
- inappropriate language
- unnecessary physical contact
- inappropriate private messaging
- repeated boundary concerns
- creating unnecessary one-to-one situations.

Low-level concerns should be recorded and reviewed.

A pattern of apparently minor concerns may indicate a more significant safeguarding risk.

43. DBS referrals

Where SwimTayka is providing regulated activity and removes a person from regulated activity because they have harmed or pose a risk of harm to a child, or would have removed them had they not resigned or stopped volunteering, the trustees and DSL must consider whether SwimTayka has a **legal duty to make a referral to the Disclosure and Barring Service**.

A person resigning does not bring the safeguarding process to an end.

SwimTayka will make a DBS referral where the statutory referral conditions are met.

44. Charity Commission serious incident reporting

Safeguarding concerns may also constitute a serious incident requiring reporting to the Charity Commission.

The trustees must consider whether a serious incident report is required whenever there is an actual or alleged safeguarding incident that has resulted in, or risks:

- significant harm to a person
- significant loss of charity assets
- significant damage to SwimTayka's work
- significant damage to SwimTayka's reputation.

Reporting an incident to the police, local authority, DBS or another regulator does not remove the trustees' responsibility to consider reporting it to the Charity Commission.

Where a report is required, it should be made promptly and with the authority of the trustee body.

45. Whistleblowing

Nobody should be prevented from raising a genuine safeguarding concern.

Staff, volunteers and partners may bypass normal management arrangements where:

- the concern involves their manager
- they believe the concern is being ignored
- they believe reporting internally may place somebody at risk
- there is another reasonable reason for doing so.

No person should suffer retaliation for raising a genuine safeguarding concern in good faith.

Safeguarding concerns can be raised directly with:

safeguarding@swimtayka.org

A person may also contact an appropriate statutory authority directly.

46. Complaints from children and families

Children and families must have a reasonable means to raise:

- safeguarding concerns
- complaints
- concerns about behaviour
- concerns about programme safety.

Information should be provided in an age-appropriate and accessible format wherever reasonably possible.

A complaint involving possible harm to a child must be treated as a safeguarding matter rather than dealt with solely through the ordinary complaints procedure.

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47. Aquatic and environmental safety

Safeguarding includes protection from foreseeable physical danger.

Each SwimTayka programme must undertake appropriate risk assessment covering matters such as:

- water conditions
- depth
- currents
- tides
- weather
- pool condition
- entry and exit arrangements
- emergency rescue
- first aid
- participant swimming ability
- supervision
- equipment
- water quality where appropriate.

Open-water sessions require particular consideration of environmental conditions.

Activities must be stopped where conditions cannot reasonably be made safe.

No fundraising, timetable or programme objective takes priority over the immediate safety of participants.

48. Children who require additional support

Some children may need additional safeguarding support because of:

- disability
- communication needs
- trauma
- displacement or refugee status
- language barriers
- previous abuse
- developmental needs.

Programme teams should make reasonable adjustments to enable children to:

- participate safely
- understand instructions
- communicate concerns

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- be heard.

Where appropriate, interpreters or suitable communication support should be used.

Children should not be excluded solely because providing appropriate support requires additional planning.

49. Safeguarding volunteers

Safeguarding also involves creating an environment in which volunteers feel able to:

- report concerns
- challenge unsafe practice
- ask for help
- disclose mistakes
- raise concerns about another volunteer or manager.

Volunteers should never be asked to deal with a safeguarding situation alone.

Appropriate support should be made available after a serious incident or disclosure.

50. Record retention and security

Safeguarding information will be retained in accordance with SwimTayka's data-retention arrangements and applicable data protection requirements.

Retention decisions will take account of:

- the nature of the concern
- safeguarding requirements
- statutory or regulatory requirements
- potential future inquiries
- legal limitation periods
- insurance requirements.

Safeguarding records must not be destroyed simply because:

- a volunteer leaves
- a programme closes
- an allegation was not substantiated
- no criminal prosecution occurs.

Access must remain appropriately restricted.

51. Learning from safeguarding incidents

Following a safeguarding incident or significant concern, SwimTayka should consider whether a learning review is appropriate.

The purpose is not to apportion blame but to identify:

- what happened
- whether procedures were followed
- what worked well
- what could be improved
- whether training needs to change
- whether partner arrangements need to change
- whether risk assessments need to change
- whether policies need updating.

Relevant lessons should be shared appropriately while preserving confidentiality.

52. Monitoring

The DSL will provide appropriate safeguarding information to trustees.

Trustees should receive sufficient information to understand:

- number and nature of safeguarding concerns
- themes or patterns
- training compliance
- DBS and safer recruitment compliance
- partner safeguarding issues
- serious incidents
- actions required.

Personal information should only be included where necessary.

Safeguarding should be considered routinely within trustee governance and risk-management discussions.

53. Policy review

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SwimTayka - Safeguarding Children Policy



This policy will be formally reviewed by the Board of Trustees at least annually.

It must also be reviewed earlier where appropriate following:

- a significant safeguarding incident
- a serious concern
- an identified weakness in procedures
- new legislation
- new statutory or Charity Commission guidance
- material changes to DBS requirements
- commencement of relevant new statutory safeguarding duties
- launch of a programme in a new country
- a significant change to SwimTayka's operating model.

Changes must be approved through SwimTayka's governance arrangements and communicated to relevant staff, volunteers and partners.

54. Relevant UK legislation and guidance

SwimTayka's safeguarding arrangements have regard, where applicable, to current legislation and guidance including:

- Children Act 1989
- Children Act 2004
- Charities Act 2011
- Safeguarding Vulnerable Groups Act 2006, as amended
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Equality Act 2010
- Data Protection Act 2018
- UK General

55. Policy Review Timeline

This policy will be reviewed annually at the meeting of Trustees. Requests for amendment should be made prior to the meeting with changes proposed.

Version Number	Changes made	Date
1.0	created	May 2017

SwimTayka - Safeguarding Children Policy



1.1	Changed logo and added new Trustees 3b: replaced 'serious bullying' with just 'bullying' 7.3: SwimTayka will assist in any criminal case, changed from may to will	January 2018
1.2	2. added 1:5 ratio 3b. changed: Some level of emotional abuse is involved in all types of all treatment of a child and/or vulnerable adult though it may occur alone. to Emotional abuse often accompanies other forms of abuse, although it is sometimes carried out in isolation. 5a. Added a step by step process	January 2019
1.3	Removed USA references Sign by all Trustees	January 2020
1.4	New Branding Added Ben Freeman	January 2021
2.0		September 2026

