

Brighton Swimming Centre



Safeguarding Policy

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1. Introduction

- 1.1. Safeguarding children and young people is a shared responsibility. Anyone who comes into contact with them—whether in or out of the water—has a role to play in keeping them safe.
- 1.2. The wellbeing of our swimmers is our top priority.
- 1.3. Brighton Swimming Centre is more than just a pool—it's a community hub. Every person involved contributes to creating a positive, respectful, and secure environment, both in and around the water.
- 1.4. Our safeguarding policy is underpinned by the principles of the **Children Act 1989** and the **Children Act 2004**. These Acts establish the legal duty to promote the welfare of children and ensure that all agencies work collaboratively to protect them from harm. We are also guided by **'What to do if you're worried a child is being abused – Advice for practitioners' (HMG 2015)**, which outlines clear steps for recognising, responding to, and reporting concerns.
- 1.5. We are committed to ensuring that all staff, contractors understand their responsibilities and act promptly and appropriately in the best interests of the child.

2. Our Ethos

- 2.1. We work in a trauma-informed way. We understand that some children may have experienced adversity or trauma that affects their confidence, emotional well-being, or ability to learn. Our approach is grounded in empathy, patience, and sensitivity to reduce barriers to participation and help every swimmer feel safe and supported.
- 2.2. We aim to foster a culture where young swimmers feel valued, listened to, and empowered to speak up. Through regular instruction and safety reminders, we teach children how to keep themselves and others safe in the water and in the wider world.
- 2.3. Every adult at Brighton Swimming Centre—including swimming teachers, lifeguards, office staff, volunteers, and visiting professionals—has a role in safeguarding. We ensure everyone is confident in recognising signs of harm and raising concerns appropriately.
- 2.4. We value working in partnership with parents and carers to support the safety and wellbeing of every swimmer. We aim to build trust and understanding around our safeguarding responsibilities, including the possibility of involving external agencies when necessary to ensure a child's safety.

3. Scope

- 3.1. Throughout these policies and procedures, reference is made to “young people”. This term is used to mean “those under the age of 18”.
- 3.2. Brighton Swimming Centre also recognises that some adults with learning difficulties and any adults who are considered to be vulnerable in any manner whatsoever, are to be protected within this policy. The term “young people” refers to all of the above within this policy.
- 3.3. This policy applies to all individuals working at Brighton Swimming Centre, including permanent and temporary staff, contractors, and volunteers.

4. Designated Staff with Responsibility for Child Protection

- 4.1. Jade Gurr is our designated safeguarding Lead (DSL), having completed the Level 3 designated safeguarding lead course (last updated/completed May 2025).
- 4.2. The DSL is responsible for:
 - Managing concerns or allegations of abuse
 - Supporting and advising staff with safeguarding matters
 - Keeping detailed records of all concerns, regardless of outcome
 - Ensuring parents are aware of our safeguarding policy
 - Liaising with safeguarding agencies and partner organisations
 - Ensuring all team members are trained and confident in their safeguarding duties

5. Supporting Children and Young People

- 5.1. Swimming pools can offer structure, consistency, and a safe space, particularly for children experiencing instability elsewhere. We recognise the important role we play.
- 5.2. We understand that trauma can show itself in many ways. Some swimmers may be quiet or anxious, while others may become disruptive. Our staff are trained to respond with care, understanding that behaviour is a form of communication.
- 5.3. Children may be at risk from a range of environments, not just home life. This includes peer relationships, school, online activity, or interactions around the pool. We take peer-on-peer incidents seriously and respond with appropriate care and action.
- 5.4. Disclosure of harm is not always straightforward. Children may be unsure, afraid, or unable to speak up. Staff are encouraged to stay alert, notice small changes in behaviour, and speak to the DSL even if a child hasn't said anything explicitly.
- 5.5. While being LGBTQ+ is not a safeguarding concern, we understand that LGBTQ+ young people may face additional vulnerabilities. We are committed to making Brighton Swimming Centre an inclusive and affirming space.

We support swimmers by:

- Encouraging open conversations about safety and boundaries
- Ensuring any concerns raised by swimmers are taken seriously
- Promoting independence, confidence, and respect through our lessons
- Training staff to respond to concerns about a child or adult
- Recognising and responding appropriately to additional needs (e.g. SEND)
- Working collaboratively with safeguarding professionals and local services

6. Child Protection and Safeguarding Procedure

- 6.1. In line with the procedures, the Front Door for Families will be notified as soon as there is a significant concern.
- 6.2. The name of the DSL will be clearly advertised in the swimming centre.
- 6.3. We will ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children and young people and act in their best interests. We will do this by publishing the policy and procedures on our website.
- 6.4. All actions taken in response to safeguarding concerns will be in line with the Pan Sussex Child Protection and Safeguarding Procedures, which outline how concerns should be reported and managed within the local authority framework.

7. Record Keeping

- 7.1. Brighton Swimming Centre is committed to maintaining clear, accurate, and confidential records for all children and young people with safeguarding concerns. These records are kept in stand-alone files specifically created for safeguarding purposes, ensuring information is appropriately separated from other documentation.
- 7.2. All safeguarding information—including reports, case notes, and supporting documents—is stored digitally in a secure folder within our organisation's SharePoint site. This folder is restricted to authorised members of management who have completed safeguarding and data protection training. Safeguarding files must not be stored or synced locally on staff devices. To minimise the risk of unauthorised access through lost or stolen equipment, safeguarding data will be accessed only via the SharePoint web interface and must not be included in OneDrive sync folders.
- 7.3. To further protect this data, all authorised users are required to use multi-factor authentication (MFA) and strong, unique passwords for access. Access to safeguarding records is strictly limited to the Designated Safeguarding Lead (DSL) and other authorised safeguarding officers. Where files are accessed via OneDrive for any reason, the device used must be encrypted and compliant with the organisation's IT security policies.

- 7.4. Records are retained in line with legal requirements and our organisational data retention policy. Once no longer required, digital safeguarding records are permanently deleted using secure data erasure methods.
- 7.5. Brighton Swimming Centre is registered with the Information Commissioner's Office (ICO) and operates in full compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

8. Attendance

- 8.1. Monitoring attendance is a key part of safeguarding within our swimming school. Registers are taken for every swimming lesson, course, and session involving children or young people. Accurate attendance tracking allows us to ensure the safety and welfare of all participants.
- 8.2. Any unexplained absences or repeated patterns of non-attendance are followed up promptly, and concerns are escalated to the Designated Safeguarding Lead (DSL) if necessary. This enables us to identify and respond to potential safeguarding issues in a timely and appropriate manner.
- 8.3. Attendance records are stored securely, electronically, and are only accessible to authorised staff members. These records are retained in accordance with our organisational data retention policy and any applicable safeguarding or regulatory guidance.

9. Safer Workforce and Managing Allegations Against Staff and Volunteers and Managing Low-Level Concerns about staff and volunteers

- 9.1. We will prevent individuals who pose risks to children from working at Brighton Swimming Centre by ensuring that all individuals working in any capacity undergo an enhanced DBS check.
- 9.2. We have a staff code of conduct and a disciplinary policy and procedure in place, including guidance on managing low-level concerns and serious allegations.

10. Staff Induction, Training and Development

- 10.1. All new staff members will be given an induction, which includes completing an online Level 2 safeguarding course, familiarising themselves with Brighton Swimming Centre's Safeguarding Policy, the staff Code of Conduct, and the role of the DSL.
- 10.2. DSL will undergo appropriate safeguarding training, to be refreshed every two years.
- 10.3. All staff will complete safeguarding refresher training every 2 years.
- 10.4. Brighton Swimming Centre will maintain accurate records of satisfactory completion of all staff child protection and safeguarding training

11. Confidentiality, Consent and Information Sharing

- 11.1. We recognise that all matters relating to child protection are confidential.
- 11.2. The DSL will only disclose information to other members of staff on a need-to-know basis, and in the best interests of the child or young person.
- 11.3. All staff members must be aware that they cannot promise a child/young person to keep secrets which might compromise their safety or well-being.
- 11.4. All staff members have a professional responsibility to share information with other agencies to safeguard children.
- 11.5. We will ensure all staff are confident in their legal responsibilities, including when consent is needed to share information and when it can be shared without consent. Staff are supported to make informed decisions about sharing information in line with *Information Sharing Advice for practitioners providing safeguarding to children, young people and carers (DfE, 2018)*

- 11.6. This guidance makes clear that the safety and well-being of the child must be the primary consideration when making decisions about sharing information. Staff do not need to consent to share information if a child is at risk

12. Contractors, Service and Activity Providers

- 12.1. We will ensure that contractors and providers are aware of our child protection policy and procedures. We require that employees from these organisations follow our procedures to report concerns.

13. Whistle-Blowing and Complaints

- 13.1. 12.1. We recognise that children and young people cannot be expected to raise concerns in an environment where staff fail to do so.
- 13.2. 12.2. We will ensure that all staff are aware of their duty to raise concerns, including about the behaviour or attitudes of colleagues. If necessary, staff should speak to the DSL. If they do not feel able to raise concerns internally, they may contact the NSPCC Whistleblowing Helpline on 0800 028 0285.
- 13.3. 12.3. We have a clear reporting procedure for children, young people, parents, carers, and others to raise concerns or complaints.

14. Site Security

- 14.1. All staff have a responsibility to ensure that Brighton Swimming Centre is secure and to report any concerns relating to site security.

15. Quality Assurance

- 15.1. We will ensure that systems are in place to monitor the implementation of, and compliance with, this policy and its procedures.

16. Policy Review

- 16.1. This policy and the procedures will be reviewed annually.
- 16.2. The DSL will ensure that staff are made aware of any amendments or updates to the policy.

Appendix A – The Role of the Designated Safeguarding Lead (DSL)

1. Managing Referrals

- 1.1. Refer all cases of suspected abuse to Front Door for Families and, where a crime may have been committed, to the police.
- 1.2. Refer any concerns or allegations involving a member of staff, swimming teacher, coach, or volunteer to the Local Authority Designated Officer (LADO).
- 1.3. Inform the Disclosure and Barring Service (DBS) if an individual is dismissed or resigns from the Centre due to posing a risk of harm to a child or young person.
- 1.4. Act as a source of support, guidance, and expertise for colleagues on all matters relating to safeguarding and child protection within the pool setting.
- 1.5. Liaise regularly with the Managing Director to ensure safeguarding issues are addressed promptly and effectively.
- 1.6. Refer concerns regarding radicalisation or extremist views to the Channel Programme via: preventreferralsbrightonandhove@sussex.pnn.police.uk

2. Record Keeping

- 2.1. Maintain clear, accurate, and securely stored records of all safeguarding concerns and referrals, including any observations made during swimming lessons, around changing areas, or during interactions at the poolside.
- 2.2. Create and manage a stand-alone safeguarding file for any swimmer where concerns have been raised.
- 2.3. Keep a chronology of significant incidents, behaviours, or disclosures relating to any swimmer with ongoing safeguarding needs.
- 2.4. Ensure all records are kept confidential and accessible only to those with appropriate safeguarding authority.

3. Multi-Agency Working and Information Sharing

- 3.1. Work in partnership with Children's Social Care and other relevant agencies during any safeguarding enquiries or interventions under Section 47 of the Children Act 1989.
- 3.2. Share relevant information appropriately, ensuring it supports the safety of the child while remaining in line with data protection regulations and statutory safeguarding guidance.

4. Training

- 4.1. Undertake regular safeguarding training (updated at least every two years) to ensure all safeguarding leads and staff can:
 - Recognise the signs of abuse, including specific risks relevant to the swimming environment such as inappropriate physical contact, peer-on-peer harm in changing areas, or signs of neglect.
 - Respond effectively to cases involving Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), or fabricated or induced illness
 - Understand referral pathways and the process for providing Early Help to swimmers and families needing additional support.
- 4.2. Complete Prevent awareness training to recognise and respond to signs of potential radicalisation.
- 4.3. Promote a culture where children feel safe to speak up, are listened to, and their views are taken seriously, whether in lessons, at reception, or during general interactions in and around the pool.

- 4.4. Keep accurate records of all staff safeguarding training, including induction, refresher courses, and specialist updates for designated staff.

5. Awareness Raising

- 5.1. Review the Child Protection and Safeguarding Policy annually to ensure it reflects current legislation, best practice, and the specific needs of a swimming centre environment.
- 5.2. Make the safeguarding policy publicly available, for example via our website and noticeboards in the Centre, and inform parents and carers that concerns about abuse may be reported to external agencies when necessary.

6. Quality Assurance

- 6.1. Monitor the implementation and effectiveness of safeguarding policies and procedures through internal reviews, staff feedback, and external audits where applicable.
- 6.2. Ensure the Centre maintains a consistent and proactive approach to safeguarding, especially in high-risk areas.

Appendix B – Child Protection and Safeguarding Procedures

1. Definitions

- 1.1. **Abuse**, including neglect, is a form of maltreatment. A person may abuse a child by inflicting harm or by failing to prevent harm. Children may be abused within their family, in an institutional or community setting, by those known to them, or, more rarely, by a stranger.
- 1.2. **Children** are individuals who have not yet reached their 18th birthday. A 17-year-old, whether living independently, in further education, in the armed forces, or in hospital, is considered a child and is entitled to the same protection and services as anyone younger.
- 1.3. **Child protection** is part of safeguarding and promoting the welfare of children. It refers to the activities undertaken to protect specific children who are suffering or are likely to suffer significant harm.
- 1.4. **Early Help** refers to providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to their teenage years.
- 1.5. **Harm** refers to ill-treatment or impairment of health and development, including harm suffered by seeing or hearing the ill-treatment of another.
- 1.6. **Safeguarding children** refers to the actions taken to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children* (July 2018) as:
 - Protecting children from maltreatment;
 - Preventing impairment of children's health and development;
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
 - Taking action to enable all children to achieve the best outcomes.
- 1.7. **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states, "where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child."

2. Categories of Abuse

- 2.1. **Physical abuse** causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.
- 2.2. **Neglect** is the persistent or severe failure to meet a young person's basic physical and/or psychological needs. It will result in serious impairment of the child's health or development.
- 2.3. **Sexual abuse** involves a young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant.
- 2.4. **Emotional abuse** occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.
- 2.5. **Bullying** can take many forms and may include threatening, inappropriate or abusive statements, made on social networks or via the internet in general.

3. Specific Safeguarding Issues

3.1. Information on Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse that can occur in any setting, including swimming pools. It involves the manipulation or coercion of a young person under the age of 18 into sexual activity in exchange for something they need or want, or for the financial or social advantage of the abuser. Victims may not always recognise they are being exploited,

particularly in environments like swimming pools, where interactions may occur in changing rooms, showers, or through online platforms linked to the pool's social media.

Key factors include:

- CSE can affect any child or young person (male or female) under 18
- It can occur physically or online, including coercion from peers or adults within or outside the pool environment
- It may not involve physical contact but could include the sharing or inappropriate images or manipulation online.

Indicators in a swimming pool environment might include:

- A child arriving with unexplained gifts or money;
- A child associating with older individuals at the pool or leaving with them;
- A child who seems withdrawn or nervous before or after certain pool sessions or swim lessons;
- Changes in a child's behaviour, such as becoming more secretive, especially regarding their mobile devices or social media accounts associated with pool activities;
- A child exhibiting signs of being pressured to engage in inappropriate relationships or share intimate photos.

3.2. Information on Child Criminal Exploitation (CCE)

Child criminal exploitation can involve young people being coerced into carrying drugs or engaging in criminal activity, often through threats or manipulation. Swimming pools, particularly in areas with gang activity, can be used as places for recruitment or grooming.

Key indicators include:

- Children regularly missing swim sessions or showing signs of distress before pool visits;
- Sudden involvement in criminal activity, such as carrying illicit substances, while attending the swimming pool;
- Reports of bullying or intimidation by older individuals attending the same swimming pool.

In these situations, pool staff should be trained to identify changes in behaviour and maintain vigilance for signs of criminal involvement.

3.3. Information on Domestic Violence

Children exposed to domestic violence may show emotional or physical signs during swimming lessons. This might be particularly evident when a parent or carer is present.

Possible signs include:

- Fear of a specific family member.
- Anxiety about leaving the pool or being around certain people.
- Physical injuries that raise concern.

Staff must respond with sensitivity and refer any suspicions through appropriate safeguarding channels.

3.4. Information on Homelessness

Homelessness or the risk of homelessness can have a severe impact on a child's well-being. In the context of swimming pools, children from homeless families may be particularly vulnerable. Pool staff should be aware of indicators such as children being brought to the pool by strangers or spending large amounts of time at the pool in the absence of their families. Additionally, children who are homeless may not have access to necessary personal hygiene items and may appear dishevelled.

Indicators of homelessness may include:

- Children arriving at the pool with inappropriate clothing for swimming or without adequate personal hygiene;
- Children appearing to be without a responsible adult during lessons or swim sessions;

- Children showing signs of neglect, such as poor health or not attending regularly.

3.5. **Information on Female Genital Mutilation (FGM)**

While FGM is less likely to be directly observed in a swimming pool environment, professionals should remain alert to the signs that a child may be at risk of this practice, particularly if they belong to communities where FGM is a known cultural practice. Children may exhibit reluctance to undress in public or show anxiety about participating in swimming activities, especially in changing rooms or showers.

Signs of FGM or risk include:

- A child expressing fear or distress about attending swimming lessons or changing in the communal changing rooms;
- A child requesting to use a private area to change, such as a cubicle, and showing signs of discomfort when asked to participate in group activities like swimming;
- A noticeable change in behaviour, such as withdrawal or reluctance to talk about home life.

Staff should be sensitive in approaching these matters and follow appropriate safeguarding procedures if they suspect a child is at risk.

3.6. **Information on Forced Marriages**

Forced marriage is a serious issue, and while it is less likely to be directly linked to swimming pool activities, staff should be aware of the risk of forced marriage, particularly when dealing with young people from communities where such practices may occur. Young people may share concerns about older family members or siblings who are being pressured into marriage, and they may express distress during swimming activities.

Signs of a child being at risk of forced marriage may include:

- A child showing reluctance to attend the pool with certain family members or expressing anxiety about certain dates or events;
- A child discussing a forced family marriage or displaying signs of emotional distress related to family pressures;
- The child being withdrawn or showing signs of anxiety about personal relationships or their future.

If there is any concern, staff should report the issue to the appropriate safeguarding lead and seek guidance.

3.7. **Information on preventing radicalisation**

Radicalisation can be a concern in any environment, including swimming pools. Young people may be vulnerable to being drawn into extremist ideologies, especially if they are isolated or subjected to pressures from individuals outside of the swimming pool setting. Staff should be aware of any changes in a child's behaviour that could signal a shift towards extremist views, particularly if they have become involved with groups that promote such ideologies.

Signs of radicalisation could include:

- A child regularly expressing extreme views or exhibiting behaviours that seem out of alignment with previous norms;
- Changes in friendship groups, especially those with an extremist or isolating influence;
- Displaying signs of being drawn into online groups that promote hate or violence.

Training and awareness programmes for pool staff should include recognising such signs and responding appropriately.

3.8. **Information on Sharing Nudes/Semi-Nudes, Sexting, and Upskirting**

Sexting and sharing explicit images or videos can occur in swimming pool settings, particularly in the context of peer relationships or through online communication channels linked to the pool (e.g., swim teams or social media groups). Pool staff should be aware of the risks and know how to handle situations where children may be involved in sharing inappropriate images or videos.

Actions to consider include:

- Avoiding direct interaction with or viewing any explicit material, but ensuring that the incident is documented and reported to the Designated Safeguarding Lead;
- Checking if the image is shared outside of the pool environment, particularly on social media or with peers;
- Taking appropriate action in line with local policies if the image is shared inappropriately or involves bullying or coercion.

Upskirting is a criminal offence. Staff should be aware of any inappropriate or hidden filming in the pool or changing areas, which could lead to criminal activity. If staff or children observe any such behaviours, immediate action should be taken to ensure the safety and privacy of the victim, and appropriate authorities should be alerted.

3.9. Further Information on Private Fostering

Staff should be alert to the possibility of children who may be privately fostered, especially those attending swimming pool activities without close family supervision. If a child regularly attends the pool with an adult who is not a parent or a known relative, this may require further investigation. Pool staff should inform safeguarding leads if they suspect a child is being privately fostered and not properly reported to Children's Services.

Indicators of private fostering may include:

- Children consistently attending pool sessions with a non-relative;
- A child expressing signs of emotional or physical distress, possibly indicating neglect or unsuitable care arrangements.

3.10. Further Information on Extremism and Radicalisation

Brighton Swimming Centre recognises its responsibility under the Prevent Duty, as outlined in the Counter-Terrorism and Security Act 2015, to help prevent children and young people from being drawn into extremism or radicalisation.

We are committed to promoting British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs.

Reporting a Prevent Concern:

- Record the concern – Document what was seen, heard or disclosed factually and clearly.
- Report to the DSL – All Prevent concerns must be passed to the DSL immediately. If unavailable, contact the Deputy DSL or another senior staff member.
- DSL action – The DSL will assess the concern and may consult with:
- Local Prevent Coordinator:
Nahida Shaikh – Partnership Community Safety Team
Tel: 01273 290584
Email: nahida.shaikh@brighton-hove.gcsx.gov.uk
- Or the Multi-Agency Safeguarding Hub (MASH).
- Referral – If someone is believed to be at risk of radicalisation, the DSL may complete a Prevent referral form.
- Immediate risk – Call 999 if there is a threat to life or imminent danger.

All concerns and actions taken must be recorded and stored securely in line with data protection and safeguarding procedures.

4. Recognition – What To Look For

- 4.1. Staff members should refer to the detailed information about the categories of abuse and risk indicators
- 4.2. In an abusive relationship, the child may:
 - Appear frightened of their parent(s)
 - Act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups
- 4.3. In an abusive relationship, the parent or carer may:
 - Persistently avoid child health services and treatment of the child's illnesses
 - Have unrealistic expectations of the child
 - Frequently complain about or to the child and fail to provide attention or praise
 - Be absent
 - Be misusing substances
 - Persistently refuse to allow access on home visits by professionals
 - Be involved in domestic violence and abuse
 - Be socially isolated
- 4.4. Staff should be aware that children with SEND can face additional safeguarding challenges, including:
 - Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's disability
 - Children with special educational needs and disabilities are particularly vulnerable to bullying and often show no outward signs
 - Communication issues can be a barrier to effective safeguarding

5. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

If a young person discloses that he or she has been abused in some way the member of staff should follow this guidance:

- Listen to what is being said without displaying shock or disbelief
- Only ask questions when necessary to clarify, and without suggesting what the answer might be.
- Accept what is being said.
- Allow the young person to talk freely – do not put words in the young person's mouth.
- Reassure the young person that what has happened is not his or her fault.
- Do not make promises that you may not be able to keep.
- Do not promise confidentiality – it may be necessary to refer the child to Children's Social Care.
- Stress that it was the right thing to tell.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Inform the designated safeguarding lead without delay.
- Complete the young person protection incident/welfare concern form and pass this onto the designated safeguarding lead.
- Dealing with a disclosure from a young person and safeguarding issues can be stressful, consider seeking support for yourself and discuss this with the designated safeguarding lead.

Staff Member	What action to take if you have concerns
Any member of staff, volunteer or contractor	<ul style="list-style-type: none"> • Discuss your concerns with the designated safeguarding lead, as soon as possible. • Complete the young person incident/welfare concern form and pass it to the designated safeguarding lead. • If the designated safeguarding lead is not available you should contact the Front Door For Families yourself. Inform the designated safeguarding lead about what actions you have taken.
Designated Lead	<p>You are concerned the young person is at risk of significant harm</p> <ul style="list-style-type: none"> • Contact the Front Door For Families immediately. • If you believe that the young person is in immediate danger, or you suspect a crime has been committed, you must contact the police immediately – calling 999.
	<p>You believe the young person is not at risk of significant harm but the child or their family may need support</p> <ul style="list-style-type: none"> • Discuss your concerns with the parent/guardian • Discuss your concerns with senior colleagues • Record all your communications and decision-making on the young person's protection incident/welfare concern form sent by the staff member who contacted you originally. Keep all records on file.

6. Managing allegations of abuse made against staff or volunteers.

- Brighton Swimming Centre takes seriously all allegations of abuse made against staff and volunteers and will investigate.
- Brighton Swimming Centre recognises that the Children's Act 1989 that the welfare of the young person is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with the member of staff or volunteer can irreparably damage an individual's reputation, confidence and career. Therefore those dealing with such allegations within Brighton Swimming Centre will do so with sensitivity and will act in a careful, measured way.
- A member of staff who received an allegation about another staff member from a young person should follow the below guidance:
 - Listen to what is being said without displaying shock or disbelief
 - Only ask questions when necessary to clarify, and without suggesting what the answer might be.
 - Accept what is being said.

- Allow the young person to talk freely – do not put words in the young person's mouth.
- Reassure the young person that what has happened is not his or her fault.
- Do not make promises that you may not be able to keep.
- Do not promise confidentiality
- Stress that it was the right thing to tell.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Complete the young person protection incident/welfare concern form and pass this onto the designated safeguarding lead.
- The allegation should be reported immediately to the designated safeguarding lead, unless the designated safeguarding lead is the person against whom the allegation is made, in which case the report should be made to the Managing Director.
- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the designated safeguarding lead (or designated person).
- Record information about times, dates, locations, and names of potential witnesses.

Initial assessment by the designated safeguarding lead

- The designated safeguarding lead (or designated person) should make an initial assessment of the allegation. **Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the appropriate authority.**
- It is important that the designated safeguarding lead (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision on whether or not the allegation warrants further investigation.
- Other potential outcomes are:
 - The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the young person. The matter should be addressed in accordance with Brighton Swimming Centre disciplinary procedures.
 - The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

- Child protection enquiries by Front Door For Families or the police are not to be confused with internal, disciplinary enquiries by Brighton Swimming Centre. Brighton Swimming Centre may be able to use the outcome of external agency enquiries as part of its own procedures.
- Brighton Swimming Centre shall hold in abeyance its own internal enquiries while the formal police or Front Door For Families investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.
- If there is an investigation by an external agency, for example the police, the safeguarding officer or designated person should normally be involved in, and contribute to, the inter-agency strategy discussions. The safeguarding officer (or designated person) is responsible for ensuring that Brighton Swimming Centre gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.
- Subject to objections from the police or other investigating agency, the designated safeguarding lead (or designated person) shall:

- Inform the young person or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the young person making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- The safeguarding officer (or designated person) shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

- Suspension should not be automatic. In respect of staff, suspension can only be carried out by the MD.
- Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- Suspension should only occur for a good reason. For example:
 - Where a young person is at risk.
 - Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
 - Where necessary for the good and efficient conduct of the investigation.
- If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.
- Prior to making the decision to suspend, the designated safeguarding lead/MD should interview the member of staff.
- During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt but given the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.
- If the MD considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day.
- Where a member of staff is suspended, the MD should address the following issues:
 - The parents/carers of the young person making the allegation should be informed of the suspension. They should be asked to treat the information as confidential.
 - Consideration should be given to informing the child making the allegation of the suspension.
- The suspension should remain under review in accordance with Brighton Swimming Centres disciplinary procedures.

The Disciplinary Investigation

- The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.
- The member of staff should be informed of:
 - The disciplinary charge against him/her.

- His/her entitlement to be accompanied or represented by a trade union representative or friend.
- Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.
- The young people making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to Brighton Swimming Centre of the member of staff (if suspended).

Allegations without foundation: the following processes should be considered.

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a young person other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

Records

- It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

7. Staff Inductions, Training and Development

- All new staff members will be given an induction which includes completing an online Level 2 safeguarding course, familiarising with Brighton Swimming Centre's Safeguarding Policy, Brighton Swimming Centre code of conduct and who are the designated safeguarding leads at Brighton Swimming Centre.
- The designated safeguarding leads will undergo safeguarding training and this will be refreshed every 2 years.
- All staff will complete safeguarding refresher training every 2 years.
- Brighton Swimming Centre will maintain accurate records of satisfactory completion of all staff child protection and safeguarding training

8. Recruitment

Brighton Swimming Centre is committed to ensuring safer recruitment and employment practices to protect children and vulnerable adults.

- In line with the Safeguarding Vulnerable Groups Act 2006, all staff must undergo an enhanced Disclosure and Barring Service (DBS) check before commencing employment. No staff member will start work without a valid DBS clearance.
- All staff and regular volunteers will be subject to thorough pre-employment checks, including verification of identity, right to work, qualifications, and references from previous employers.
- Clear job descriptions and a code of conduct outlining safeguarding responsibilities and expected behaviours will be provided to all new staff.
- Brighton Swimming Centre recognises that certain roles are exempt from the Rehabilitation of Offenders Act 1974, meaning that spent convictions may still be considered as part of the recruitment process.

- All staff are required to complete an online Level 2 safeguarding course prior to their first shift and receive a comprehensive induction, which includes familiarisation with Brighton Swimming Centre's safeguarding policy and procedures
- Staff roles and responsibilities in safeguarding are clearly defined, and all staff are expected to:
 - .1. Understand and adhere to the safeguarding policies and procedures of the swimming centre.
 - .2. Recognise signs of abuse and neglect at the earliest opportunity.
 - .3. Respond to concerns in a timely and appropriate manner.
- Continuous training and development opportunities will be provided to all staff and volunteers to ensure their safeguarding knowledge remains up to date.

Appendix C – Linked Policies

The following list is a suggestion of policies which should be linked to this policy, to support effective safeguarding:

- Complaints procedure
- Equalities Policy
- Health and Safety Policy and other linked policies and risk assessments
- Data Protection Policy
- Mobile Phone Policy
- Staff code of conduct
- Staff disciplinary policy and procedure,

Appendix D – Contact Details

Role	Name	Contact Details
Designated Safeguarding Lead	Jade Gurr	jade@brightonswimmingschool.com 01273 434400
Deputy Safeguarding Lead	Freya Bolingbroke	freya@brightonswimmingschool.com 01273 434400
Deputy Safeguarding Lead	Michael Kruger	michael@brightonswimmingschool.com 01273 434400
Local Authority Designated Officer	LADO Enquiries Team	LADOenquiries@brighton-hove.gov.uk
MASH, Early Help Hub and Family Information Service	Front Door for Families	01273 290400 Monday – Thursday 09:00-17:00, Friday 09:00-16:30
	Emergency Out of Hours	01273 335905 or 01273 335906
Police	Brighton and Hove	01273 66502 or 08456070999 or 101
Prevent Coordinator	Nahida Shaikh Partnership Community Safety Team	Nahida.shaikh@brighton-hove.gcsx.gov.uk 01273 290584 07717303292
NSPCC Whistleblowing		0800 028 0285
Public Concern at Work		02031172520